

Request for Feedback on REC Contracts, Introducing New Sector Strategists, and CS Quarterly Subscriber Verification

August 12, 2022

Program News

- **Leniency Period for Disclosure Forms Ended August 5, 2022; Full Compliance Now Required**

The Program's limited exception from the requirement that customers review and sign Disclosure Forms prior to executing their installation or subscription contract ended on Friday, August 5, 2022. This exception applied only for contracts that were signed by the customer June 30 through August 5, 2022. The requirement that customers review and sign a Disclosure Form before signing their contract now applies again in full. As a reminder, if your company has new customers who signed a contract between June 30 through August 5, 2022 who did not sign a Disclosure Form prior to contract execution, you must follow the below steps to qualify for this exception:

 1. By **August 19, 2022**, provide to the Program Administrator EITHER 1) a list of the affected customers (customer name and contract execution date) OR 2) copies of the executed contracts, which must include the customer name and execution date. These documents should be shared via an Approved Vendor's secure SharePoint folder and organized by Designee (if Designees were being used to conduct sales).
 2. Provide completed Disclosure Forms for the affected customers within 3 weeks of the customers' contract execution date.
 3. Submit the signed Disclosure Forms for the affected customers to the Portal within 6 weeks of the customers' contract execution date.
- **2022 REC Contracts Released; Request for Feedback by August 15, 2022**

On August 3, 2022, the Agency posted drafts of the updated REC Contracts revised in light of the ICC approval of the 2022 Long-Term Plan (August 2022 Draft REC Contracts), which are available at <https://illinoisabp.com/rec-contract/>. The Agency plans to finalize and publish the contracts prior to the opening of additional capacity under the Adjustable Block Program on September 1, 2022.

 - A [Request for Stakeholder Comments](#) seeks feedback on the August 2022 Draft REC Contracts. **Written Comments are due by 5:00 PM Central Prevailing Time ("CPT") on August 15, 2022 and should be sent to IPA.Solar@illinois.gov.**
- **Community Solar Quarterly Subscriber Verification**

In support of Community Solar subscriber verification, **all subscriber Disclosure Forms must be completed in the portal OR fully signed copies must be uploaded to SharePoint by the end of August 31, 2022**. This includes any new Disclosures Forms required for subscription size changes. Disclosure Forms that are completed after August 31, 2022 will not be considered for the quarterly subscriber verification. Additionally, **subscriber workbooks on SharePoint must be updated by August 31, 2022 to support the quarterly subscriber verifications**. Workbooks are expected to be available the week of August 15, 2022, pending data extraction from the Portal. Workbooks will be downloaded on September 1, 2022, and timestamped to support the quarterly subscriber verification. Please see the webinar [recording](#) from the July 6, 2022 AV Informational Webinar for more information on this process. Further details on submitting community solar quarterly reports will be forthcoming.

Transition Updates

- **Sector Strategist Introductions**

Program Administrator is excited to share that Sector Strategist Cindy Meier joined the team to support the Small Distributed Generation sector, and Julie Hurewitz joined as a Sector Strategist for the Large Distributed Generation sector. Staff members to support AVs and Designees for Community Solar (both Traditional and Community-Driven CS), and Public Schools will be joining Energy Solutions in the coming weeks. Energy Solutions looks forward to collaborating with AVs to support their work. Please watch for more information in the upcoming weeks, including outreach to AVs, additional introductions to the team, and details on the infrastructure, resources, and support the Program Administrator will be providing.

REMINDER: During the Program Administrator transition, the IPA has placed a temporary pause on all new ABP project application submissions between July 1, 2022 through September 1, 2022. New Approved Vendor applications will be accepted again beginning on September 1, 2022. All transition updates can be found on the [ABP Transition Hub webpage](#).

CONTACT US: For Portal, application, or Program-specific questions and inquiries, please contact admin@illinoisabp.com or call 877-783-1820.

Requirements and Reminders

- **Updating Banking Information for Approved Vendors with REC Contracts**

In light of heightened security measures around email correspondence, please review the process for updating banking information outlined in [this FAQ](#). Please note that the utilities do not have to honor banking changes that are made outside of the appropriate window. If a banking change needs to be made, but is not done within the necessary window ahead of invoicing, the Approved Vendor can either take payment to the original bank account on file, or rescind the invoice and re-invoice in the next period after appropriately updating the banking information ahead of the next invoicing opportunity. Please keep in mind that this process has been put in place to reduce the risk of fraudulent banking change requests.

- **Approved Long-Term Renewable Resources Procurement Plan, including Consumer Protection Handbook and Contract Requirements**

In conjunction with the Illinois Commerce Commission's approval of the IPA's 2022 Long-Term Plan, the Commission also approved consumer protection documents filed with the Plan, with minor modifications. The IPA has updated the Consumer Protection Handbook and Contract Requirements consistent with the Commission's Order and **AVs/Designees must be in full compliance with new requirements in these documents by August 28, 2022**. Please carefully review these important documents:

- 1) [Cover Letter – Consumer Protection Handbook and Contract Requirements](#);
- 2) [Consumer Protection Handbook](#);
- 3) [ABP Contract Requirements – Distributed Generation](#);
- 4) [ABP Contract Requirements – Community Solar](#)

PLEASE NOTE – The Consumer Protection Handbook replaces both the Distributed Generation and Community Solar Marketing Guidelines documents. The Marketing Guidelines documents are now out-of-date. More information on this can be found in the cover letter linked above.

The Consumer Protection Handbook includes several new requirements and clarified requirements, including but not limited to:

- Explanations of what would make an act or practice unfair or abusive
- A requirement that Approved Vendors and Designees be responsive to customer questions and concerns and respond as promptly as possible, but no later than within seven business days
- Requirements regarding compliance with contractual obligations, conducting business in a profession manner, and providing services in a workmanlike manner
- Requirements regarding cooperation with investigations and truthfulness to the Program Administrator and IPA
- Required disclosures for all marketing channels
- Required disclosures and record retention requirements for telemarketing
- Requirement that the relevant utility account holder must be the signatory on the Disclosure Form (or, if the account holder is a company or organization, an individual authorized to sign on behalf of the account holder)
- Requirements regarding the use of third-party commercially available e-signature platforms
- Requirements regarding how Disclosure Forms should be completed