

Expanded Consumer Protection Working Group, Re-Opening Updates, and CS Quarterly Subscriber Verification

August 19, 2022

Program News

- **Leniency Period for Disclosure Forms**

An announcement regarding leniency around Disclosure Forms will be released later today. Please look out for this forthcoming communication.

- **Expanded Consumer Protection Working Group for Illinois ABP and Illinois Solar For All**

Pursuant to Section 9.8 of the 2022 Long-Term Plan, the Agency is expanding and recalibrating the Consumer Protection Working Group. The IPA hopes to engage a diverse set of stakeholders to create a more robust discussion of consumer protection issues. The scope of these discussions will include both the Adjustable Block Program and Illinois Solar for All. This is an opportunity for consumers, solar companies, community and nonprofit organizations, and other members of the public to directly provide their insight and perspectives to the Program Administrators for both Programs and IPA. The feedback received from each session will help inform the Agency's strategies and decisions on a variety of consumer protection issues, including changes and updates to Program requirements and the development of consumer education materials and other resources.

The expanded IPA Consumer Protection Working Group will be held on the first Friday of each month. Meetings will be open to the public and the first expanded Consumer Protection Working Group will be held on Friday, October 7, 2022 at 10:00 AM Central Time via Zoom. For more information and to sign up to participate and receive emails about this and future meetings of the group, please complete [the form here](#).

- **September REC Invoicing**

September REC invoicing will happen outside of the Portal, utilizing SharePoint folders. Approved Vendors who have projects eligible for invoicing will be contacted via email by the Program Administrator. Invoices will be available on SharePoint to allow for secure file transfer. Additional details will be forthcoming.

- **REC Prices, Draft REC Contracts, and Questions Related to the Passage of the Inflation Reduction Act**

On August 1, the Agency published [updated REC prices](#) pursuant to the approval of the 2022 Long-Term Plan. Subsequently, the federal government enacted the Inflation Reduction Act on August 16, 2022, which modifies the federal solar Investment Tax Credit ("ITC"). The ITC is an input in the Agency's REC Pricing Model, and changes to the ITC within the model may result in a significant impact upon REC Prices. The Agency understands that Program participants act in reliance on published REC prices and recognizes the value of REC price stability to the market. As a result, the Agency will not further amend pricing for the September 1, 2022 block opening and the published REC prices will remain in place for the duration of the 2022-2023 delivery year. The Agency will update REC pricing for the 2023-24 delivery year as outlined in the 2022 Long-Term Plan.

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/>. A Request for Stakeholder Comments was issued, allowing for submission of written comments by 5:00 PM Central Prevailing Time on August 15, 2022. 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.

- **Clarification on Traditional Community Solar Block Opening**

As previously announced, the block of capacity for the 2022-23 Program Year for Traditional Community Solar will be opened on November 1, 2022. The block is opening two months after Program reopening in

order to finalize scoring criteria via a stakeholder feedback process required via the approval process of the Agency's 2022 Long-Term Plan. As projects developed for both the Public Schools category and the Equity Eligible Contractors category may be Traditional Community Solar projects, the Program will not accept Traditional Community Solar applications to these two project categories until November 1, 2022. Small and Large Distributed Generation projects and Community-Driven Community Solar projects that are developed for both the Public Schools category and the Equity Eligible Contractors category may be submitted beginning September 1, 2022.

Transition Updates

- **Program Re-Opening on September 1, 2022, and Program Year Resources**

September 1, 2022 marks the re-opening of the Adjustable Block Program, including the ability to submit Part I project applications via the Portal, for new vendors to apply to participate in the Program, and more. In recognition of the re-opening, transition processes, and substantial updates to the Plan, a Program Year 2022-23 resource guide is being developed, and will cover Portal capabilities, REC prices, updated REC contracts, information on the new Consumer Protection Handbook, information on prevailing wage compliance, sign-up to work with a Program Administrator Sector Strategist, information on becoming an Equity Eligible Contractor and future DEI initiatives, how to access support from the Program Administrator and IPA, and other FAQs. Please watch for more information.

- **Portal Updates Including Spanish-Language CS Disclosure Forms and September 1 Functionality**

As of this week, the Portal now offers the ability to generate Spanish-language Community Solar Disclosure Forms in PDF format. For the September 1 Program re-opening, the Portal will provide the ability to upload Community Solar and Distributed Generation Disclosure Forms via a CSV import function, as well as the ability to enter and submit Part I project applications. The Program Administrator suggests that Approved Vendors organize all project information and plan to finish all steps of the project application in one session, as the ability to return to an "in process" application in the Portal will not immediately be available with the September 1 re-opening, though this functionality will be available soon after.

- **Program Administrator Office Hours for Portal Support**

To support AVs and their Designees experiencing technical difficulties with use of the Portal, the Program Administrator will be offering open "office hours" to answer questions, provide support or gather other feedback. Sessions will be held with individual AV or Designee points of contact via Zoom, and the waiting room feature will be used for individual appointment privacy. Office hours are planned for the following dates and times, and Zoom information is forthcoming:

- Tuesday, August 23 – 11:00 a.m. – 12:00 p.m. CT
- Thursday, August 25 – 3:00 p.m. – 4:00 p.m. CT
- Tuesday, August 30 – 11:00 a.m. – 12:00 p.m. CT
- Thursday, September 1 – 3:00 p.m. – 4:00 p.m. CT

- **Sector Strategist AV Surveys**

As part of its enhanced support of Approved Vendors, the Program Administrator's Sector Strategists emailed AVs this week to request completion of a brief survey designed to confirm or update each AVs primary (and supplemental, if applicable) project category focus areas, to confirm contact information, and to capture interest in receiving more information about becoming an Equity Eligible Contractor. The Program Administrator requests completion of the brief survey by August 23, 2022, and we look forward to providing added sector-oriented support and resources for all AVs.

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

- **Community Solar Quarterly Subscriber Verification**

The Program Administrator has finalized Subscriber Workbooks on SharePoint, which will also be a means for Approved Vendors to submit Quarterly Community Solar Reports, as applicable.

- An announcement regarding leniency around Disclosure Forms will be released later today. As this impacts the submission of Community Solar subscriptions for quarterly reporting, please look out for this forthcoming communication.
- Subscriber workbooks on SharePoint must be updated by August 31, 2022 to support the quarterly subscriber verifications. Workbooks will be downloaded on September 1, 2022 and timestamped to support the quarterly subscriber verification. Please see the [webinar recording](#) from July 6, 2022 for more information on this process.
- Subscriber workbooks do not yet contain any Disclosure Forms created using the Workaround SharePoint Process. Please advise the Program Administrator once fully executed Disclosure Forms are uploaded to SharePoint and CSV templates are updated. At such time, the Program Administrator will update subscriber workbooks with any additional Disclosure Forms from SharePoint.
- Any required Community Solar Quarterly Reports will be collected via this workbook as well, and must be completed between September 1, 2022 and September 10, 2022.

- **AV & EEC Applications, AV Renewals**

On September 1, the Program Administrator will post links to an AV Application form for new AVs, which will include an optional section to also apply to become an EEC; a separate form will be posted for existing AVs who wish to become EECs to apply. Upon reopening of the AV application, the Program Administrator will also contact AVs who are due for renewal to submit their renewal applications.

- **September 15, 2022 ICC Submission**

To support the September 15, 2022 ICC submission, the Program Administrator is finalizing a manual re-batching process. The standard timelines will apply for AVs to re-batch projects. AVs will have the option to re-batch projects on August 29, 2022 through September 1, 2022, which is twelve business days in advance of the September 15, 2022 ICC meeting. Additional details will be forthcoming.

- **Consumer Protection Handbook Compliance Required by August 28, 2022**

As previously shared, the Illinois Commerce Commission's approval of the IPA's 2022 Long-Term Plan included approval of 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.