

CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, January 6, 2023

TOPIC 1	Supporting Stranded Distributed Generation Customers
BACKGROUND	<p>“Stranded customers” are Adjustable Block Program Distributed Generation customers whose Approved Vendor and/or Designee goes out of business, is unable to meet Program requirements, or is suspended because of disciplinary action and prohibited from advancing projects through the application process. The stranded customer may be left without an Approved Vendor and/or Designee to submit application materials, advance their application through the review process, complete system installation, and/or to pass through promised REC payments from the contracting utility.</p> <p>Section 7.7.1 of the 2022 Long-Term Plan states that:</p> <p align="center">“The Agency’s primary concern is a positive resolution for the customer, including a path forward for their project to be completed, approved as part of the ABP, and for the customer to receive promised REC payments, if possible... The Agency believes that the option of referring customers to a designated aggregator Approved Vendor that is willing to take on stranded customers is the best option for handling these types of situations”</p> <p>In support of finding a resolution for stranded customers, the Program Administrator is planning to release an announcement seeking Approved Vendors and Designees that have a proficient understanding of the Illinois Adjustable Block program and are interested in assisting stranded customers.</p> <p>The most common types of stranded customers are described in the included Exhibit 1.</p>
ISSUES / QUESTIONS FOR DISCUSS	<p><i>Discussion questions:</i></p> <ul style="list-style-type: none"> - <i>Have you encountered a stranded customer outside of those defined in Exhibit 1?</i> - <i>What assistance do you need from the Program Administrator when engaging a stranded customer?</i> - <i>What operational hurdles do you encounter when assisting a “stranded customer”?</i>

TOPIC 2	Transition Period: Disclosure Form Timing Exception
BACKGROUND	<p>Section 5 of the October 2022 Adjustable Block Program Guidebook states “The Disclosure Form should be completed after system design (for DG systems) and must be delivered to the customer and signed by the customer before the customer signs that project’s installation contract or subscription agreement, in</p>

	<p>the case of community solar.” Disclosure Forms provide key information to customers about the Program, the specific offer, and the customer’s rights, in a standardized format.</p> <p>Due to the transition between Program Administrators, the online portal through which Approved Vendors and Designees create Disclosure Forms has had some functionality issues. On August 19, 2022 the Agency announced “an exception to disclosure form timing” that allowed a narrow exception to the requirement that customers review and sign Disclosure Forms prior to executing their installation or subscription contract. This period of exception has been referred to as the “leniency period” and applies to contracts signed starting June 30, 2022.</p> <p>Over the last few months, the Program Administrator has made updates to the online portal and expects to end the leniency period for disclosure form timing in Q1 2023. The Agency will announce when the portal is functioning as intended and there will be a 2-week grace period before the requirement that Disclosure Forms be signed prior to the signing of contracts to go back into effect. After the end of the leniency period, all Approved Vendors and Designees will again need to have customers sign the Disclosure Form before signing their contract. Violations of this requirement could result in disciplinary actions from warning up to suspension from the Illinois Adjustable Block Program.</p> <p>Supporting Links: Illinois Adjustable Block Program Transition Updates IPA August 19, 2022 Announcement IPA August 26, 2022 Announcement</p>
<p>ISSUES / QUESTIONS FOR DISCUSS</p>	<p><i>Discussion questions:</i></p> <ul style="list-style-type: none"> - <i>Are there portal concerns the Program Administrator should be aware of ahead of the end of the leniency period for disclosure form timing.</i> - <i>What assistance do you need from the Program Administrator in preparation for the end of the leniency period timing?</i>

Exhibit 1: Types of Stranded Customers

When AV and/or Designee becomes unavailable	Concern Related to Customer	Considerations	What would be expected from AV/Designee
<p>1. After customer signs the Disclosure Form/contract but before application is submitted to Program.</p> <p>*There is a subset of customers who no longer have an AV <u>AND</u> Designee due to both entities exiting the market. In these cases, a customer will need to work with a new entity (or entities) to submit their application AND install their system, if not already installed*</p>	<p>Customer does not have a path for project application, and may therefore not receive promised REC incentive payment</p>	<ul style="list-style-type: none"> • Former AV/Designee may have exited IL ABP marketplace. • Former AV/Designee may be unavailable to obtain application materials for Part I submission • Customer may already have contract with the former AV/Designee. 	<ul style="list-style-type: none"> • Designee may be necessary to install or fix installation issues with project • AV would need to assemble application materials • AV would need to submit project application and commit to successfully moving the application through the Program, including passing through promised REC incentive (as applicable) to the customer • AV should provide a proposal to the customer that includes all costs and estimated timeline
<p>2. After Part I verification and before Part II submission</p>	<p>Customer does not have a path to completing the application process and may therefore not receive promised REC incentive payment</p>	<ul style="list-style-type: none"> • Customer may have contract transferring RECs to the former AV • Project may be part of a batch; AV/D will need to work closely with PA to determine a path forward • Project might still need to be installed at this stage as well 	<ul style="list-style-type: none"> • Designee may be necessary to install or fix installation issues with project • AV would need to assemble application materials • AV would need to submit project application and commit to successfully moving the application through the Program, including passing through promised REC incentive (as applicable) to the customer • AV should provide a proposal to the customer that includes all costs and estimated timeline