

To: The Illinois Power Agency  
From: Citizens Utility Board of Illinois  
Date: December 30th, 2022

Submitted to: ipa.contactus@illinois.gov

Thank you for considering these comments as the agency works to update program disclosure forms. These comments are submitted on behalf of Citizens Utility Board, an Illinois Solar for All Grassroots Educator.

## **Updated and Streamlined Disclosure Forms**

### *Introduction:*

There should be a link or contact information for the Consumer Protection Division of the Illinois Attorney General's office. This goes for all Disclosure Forms.

Link: <https://illinoisattorneygeneral.gov/consumers/filecomplaint.html>

If you are unable to resolve a complaint with your installer or Approved Vendor, you may contact the Illinois Solar for All Program Administrator by emailing [info@IllinoisSFA.com](mailto:info@IllinoisSFA.com) or by calling (888) 970-ISFA (4732). If you have been subject to fraudulent or deceptive sales practices, the Consumer Protection Division of the Illinois Attorney General's office may be able to help.

CUB is concerned with situations where income-eligible consumers may sign up for an ABP offer, because they were not aware of ILSFA. To ensure that consumers are aware of both programs (especially in the case of consumers who are eligible for ILSFA) there should be an acknowledgment listed somewhere on ALL ABP disclosure forms that states ILSFA is the most affordable option. This could serve as a last check to make sure the customer is aware of all options before signing up for an ABP program.

### *Value of Electricity and Savings Estimates:*

In every Disclosure Form included in Exhibit 1, there is a *Value of Electricity and Savings Estimates* section. Below are comments in regards to this section.

In all of the Solar for All disclosure forms, there is a "Savings as a Percentage of the Value of Energy Generated by your Solar Project" value. This value is a percentage based on the estimated costs and savings of the project. The percentage is calculated for year 1 and for over 25 years. The formula used to find the "Savings as a Percentage of the Value of Energy Generated by your Solar Project" value should be included in all ILSFA disclosure forms. Listing it in small print underneath the value could help reduce confusion. An image of the section is included below.

**Year 1**

Value of Electricity in Year 1	-	Total Costs in Year 1	=	Total Savings in Year 1	Savings as a Percentage of the Value of Energy Generated by your Solar Project
\$xxx.00	-	\$xxx.00	=	\$xxx.00	XX%

*Assuming starting electricity price of x.xx cents/kWh*

**Over 25 Years**

Estimated Value of Electricity					
Low estimate:	\$XX,XXX.00	Medium estimate:	\$XX,XXX.00	High estimate:	\$XX,XXX.00

*Assuming starting electricity price of x.xx cents/kWh; electricity price escalation rates of .5%, 1.7%, and 2.5%; production decrease of .5% per year*

Value of Electricity over 25 Years (Medium estimate)	-	Total Costs over 25 Years	=	Total Savings over 25 Years	Savings as a Percentage of the Value of Energy Generated by your Solar Project
\$xx,xxx.00	-	\$x,xxx.00	=	\$x,xxx.00	XX%

Under the Value of Electricity and Savings Estimates section, the Disclosure Forms include a range of estimated 25 year savings. They show a low, medium, and high estimate of savings. The form then uses the medium savings estimate to go on and calculate the total savings and percentage of savings over 25 years. To avoid overpromising, the disclosure form should use the low estimate to do the rest of the calculations. The disclosure form should note that the low estimate is being used.

The ILSFA Community Solar Disclosure Form states under the savings estimate section that “For income-qualified subscribers, the customer’s savings must be at least 50% of the value of the energy generated by the subscription.” That statement (or a similar one) should be included under the Value of Electricity and Savings Estimates section for EVERY ILSFA disclosure form. This way, consumers know that the “Savings as a Percentage of the Value of Energy Generated by your Subscription” value **should be at least 50%**. There may also be an opportunity to visually explain the “50% rule” by pointing the previously mentioned statement to the savings percentage box. ILSFA Community Solar form shown below.

### Value of Electricity and Savings Estimates

Below are estimates of the economic value of the electricity your subscription will generate in the first year and over the term of your subscription (how much less you will pay in electric bills). The form also provides estimated savings in year one and over the subscription term. **These estimates are NOT a guarantee.**

**For income-qualified subscribers, the customer's savings must be at least 50% of the value of the energy generated by the subscription.**

Is the customer an income-qualified subscriber?	<<yes/no/not applicable>>
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#### Year 1

Value of Electricity in Year 1	-	Total Costs in Year 1	=	Total Savings in Year 1	Savings as a Percentage of the Value of Energy Generated by your Solar Project
\$xxx.00	-	\$xxx.00	=	\$xxx.00	XX%

*Assuming starting electricity price of x.xx cents/kWh*

#### Community Solar Disclosure Forms:

All community solar disclosure forms (both ABP and ILSFA) should describe how excess/rollover credits will be billed, stored, and applied. In addition to this, disclosure forms must also disclose that credits expire annually.