



December 28, 2022

Illinois Power Agency  
105 West Madison Street, Suite 1401  
Chicago, IL 60602

To Whom It May Concern:

Clearway Energy Group LLC ("Clearway") submits the following comments to the Illinois Power Agency ("IPA") pertaining to the proposed Community Solar Disclosure Form (Exhibit 1-21) for community solar projects in the Adjustable Block Program.

We thank the IPA for its efforts in seeking collaboration with the industry prior to publishing the final disclosure forms. Clearway supports the shorter versions with more streamlined important information presented to customers at the time of origination.

**1) Page 2 "Early Termination of Subscription" Section**

**Early Termination of Subscription**

<b>Your community solar subscription will automatically be terminated if you move out of your current electric utility's service territory. A penalty or fee may apply.</b>	
Additional circumstances under which you may terminate your subscription early	<<none>> or <<explain>>
Penalty or fee for early termination	<<none>> or <<explain>>

The above draft states that the subscription automatically terminates if the customer moves out of the service territory. This language may be confusing to customers by appearing that moves outside of the territory are *automatically* processed when contradicting language in the contract may also require advance notice of a move before terminating the contract. Advance notice of early termination is necessary, especially during quarterly reporting timeframes, to ensure subscription thresholds are met for Approved Vendors. Suggested revision is "Your community solar subscription will terminate if you move out of your current electric utility's service territory. Please see your Agreement terms for advance notice requirements and applicable penalty or fee for early termination."



**2) Page 2 "Estimate Your Savings" Section**

**Estimate Your Savings**

With your community solar subscription, you will receive credits on your electric utility bill for the electricity generated by your share of the solar project. *The below estimates are NOT a guarantee.*

Estimated bill credits for first year	-	Estimated subscription fees for first year	=	Estimated total savings for first year
\$<<>>	-	\$<<>>	=	\$<<>>
Estimated first year production of electricity from your share of the solar project, multiplied by the utility Price to Compare (x.xx cents/kWh)		Your subscription fee is 80% of your bill credits		

To maximize your savings, it is important that your subscription size matches your usage over the course of the year. If your subscription is sized too large, it is possible for you to purchase more bill credits that you can use. Keep in mind that the solar project will generate more electricity in the summer months than in the winter months.

- a) We suggest that a generic savings example using an average customer size be provided in lieu of using customer-level inputted values. The customer allocation size may not be determined and verified at the time of origination which will result in a generic savings example anyhow.
- b) Additionally, we suggest that the Price to Compare include an asterisk that the Price to Compare is determined at the time of origination and subject to change. The time between contract execution and the production of solar bill credits may result in a substantial change to the Price to Compare disclosed in the Disclosure Form.
- c) The bottom paragraph on usage changes may mislead customers to believe their usage will be offset 100%. We suggest a revision to inform customers they are sized based on past usage and credits are generated to offset the supply portion (not the equivalent of 100% of usage which is comprised of supply and delivery).

**3) Page 1 Introduction**

You can contact the Illinois Shines Program Administrator by emailing [admin@illinoisshines.com](mailto:admin@illinoisshines.com) or by calling (877) 783-1820. Program website for more information: [www.illinoisshines.com](http://www.illinoisshines.com)

Other state disclosure forms include the agency information on the last page near the signature block. We recommend moving the Program Administrator’s contact information from page 1 to page 2 so that Approved Vendors or Designees serve as a first line of contact information presented to customers in the Disclosure Form.



#### **4) Disclosure Form Identification Number Footer**

We noticed that the Disclosure Form ID footer was not included in the draft forms. The ID footer was previously used by the Program Administrator for internal purposes which presented no relevant information to customers. If an ID footer will be used with the new version of the Disclosure Form, are we correct to believe that the ID footer will be used for internal purposes only and not a published part of the Disclosure Form requiring compliance?

#### **5) Interim Issues with the Portal-Generated Disclosure Form**

Clearway successfully used API before its pause on July 1, 2022, and intends to use API once it becomes available again. We would like to point out a few action items on the current version of the portal-generated Disclosure Form. We were advised to use the portal-generated versions since the SharePoint versions are being phased out. We have the following concerns on the process and final Disclosure Form output from the portal until API becomes available again.

- The Disclosure Form in the workbench has a footer stating “Illinois Shines Sample Community Solar Disclosure Form [Rev. 12/20]” which may be misleading to customers using “Sample” in the footer. We recommend that “Sample” be removed as soon as practicable.
- The saving example on page 6 references MidAmerican as the utility even when “ComEd” or “Ameren Illinois” is selected. We are concerned that ComEd or Ameren customers will take issue with the MidAmerican savings example.
- The rate information in the savings example/calculation is different in the two disclosure forms (SharePoint file vs workbench).
- The Excel file upload template used to upload the Disclosure Form details in the workbench accepts dates in a yyyy-mm-dd format. However, when converting a file from XLSX to CSV, the date format automatically changes to mm/dd/yyyy. The system does not recognize dates in any other format besides yyyy-mm-dd. The template we download and gather instructions from is in XLSX format. We recommend using a consistent date format, preferably mm/dd/yyyy format.
- The Disclosure form format available via the workbench contains variances (input fields/flow and phrasing of questions) from the Blank Disclosure form templates shared via SharePoint. Additionally, the two Disclosure form templates (SharePoint and workbench) available today are slightly different from the one that was live in market prior to the 7/1 pause date.
- We recommend adding additional search functionalities in the workbench to allow for searches using customer details. In the legacy portal, we were able to search by ID number and customer name, but the new portal only allows a search by ID number. Adding additional search field functionality would assist Approved Vendors in locating customers with ease.

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Again, Clearway appreciates the IPA seeking stakeholder feedback to increase program efficiency and ensure consumer protection.

Sincerely,  
Clearway Energy Group LLC