

From: [REDACTED]
To: [IPA.ContactUs](#)
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Subject: [External] Constellation Response to Consumer Protection Proposals
Date: Thursday, December 29, 2022 3:05:07 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image007.png](#)
[CP Working Group Follow up - December 2022.docx](#)

RE:

Consumer Protection Proposal Number/Name	Public Comment Deadline
#1 - Updated and Streamlined Disclosure Forms	December 30, 2022

IPA Consumer Protection CS Working Group –

Constellation appreciates the opportunity to provide the attached feedback to the CS Working Group request for comment on the various Disclosure form template materials.

Receipt confirmation is appreciated.

Let me know any questions or follow up.

Thank You,

Chris

Chris Wade



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- **Contact Information**

The “energy supplier” should not be a required field for general contact information because that information is unnecessary to implement community solar products. If this information is required in the optional “Alternative Retail Electric Supplier” section, then limit the requirement to identify the energy supplier to that section. Customers unwilling to provide their energy supplier information (or even unaware) to obtain a general community solar subscription would be blocked in the enrollment process.

- **Authorization to Manage Your Utility Account and Bill Payment**

Authorization to modify energy supply should not be included within the Community Solar Disclosure form. This section should not include requirements or authorizations related to agency with respect to “your energy supplier”. Most community solar products do not require any agency related to the energy supplier. If this notification is needed in the optional “Alternative Retail Electric Supplier” section to bind a community solar subscription to a specific retail energy supplier (ARES), then limit this notification to be within that section.

- **Alternative Retail Electric Supplier**

The disclaimer should be amended to indicate the ARES may charge more or less than your local utility service.

- **Project Information**

Please confirm use of this “no project specified” section does not require a new Disclosure form be generated and signed by the customer once the project is determined. Also, please confirm an email notification to the customer’s provided email address on file meets this notice requirement.

Your Community Solar Provider has not yet determined to which specific community solar project you will be subscribed, but will send you a notice with the project's name, location, and size once you are subscribed to a specific project

- **Estimate Your Savings**

Does the Disclosure tool automatically populate the Price to Compare (PTC)? If so, what is the PTC source and how are the seasonal PTC rates of the utilities applied in this calculation?

- **Rate and Payment Information**

We believe our community solar product is covered under the drop-down option “Payment equal to x% of community solar credits on your utility bill”; however, given timing of the utility billing process and potential billing issues which could cover multiple community solar bill credit periods, there could be some confusion. For example, the “Frequency of payments and start date” information is expected to be monthly and start date will be determined when the utility actually applies the first allocated credits. We can only estimate when those utility actions will occur. It may be more meaningful to state the billing for the credits will follow the application of the credits on the Utility Invoice and the timing is determined by your Utility tariff billing sections.

- **Total Estimated Utility Bill Credits and Savings**

Does this entire section or only parts thereof appear with the “Variable Rate” product option scenario?

The below statement may cause confusion for customers with a subscription “Payment equal to x% of the community solar credits on your utility bill” since they are in effect guaranteed savings regardless of the size, number of credits or month of year:

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.