

From: [REDACTED]
To: [IPA.ContactUs](#)
Cc: [REDACTED]
Subject: [External] MC Squared Energy Services – Response to Consumer Protection Proposals
Date: Wednesday, December 21, 2022 4:23:11 PM
Attachments: [image001.png](#)

Andrea,

Here are MC Squared Energy Services' (MC2) recommendations.

1. MC2 recommends that the Illinois Shines Brochure **not** be included into the new Traditional Community Solar Disclosure Form (DF) document because AV's and Designees are required to provide the Illinois Shines Brochure during the initial marketing of the community solar subscription product prior to securing authorization for the Disclosure Form and Subscription Agreement.
2. Within Proposal 11, MC2 recommends that the standard Subscription Agreement contain a declarative statement from the AV or Project Owner that it possesses insurance policies to own, operate and offer subscription services to the subscribers.
3. Within Proposal 11, MC2 recommends that the standard Subscription Agreement contain a declarative statement from the AV or Project Owner that it possesses a maintenance plan to maintain production levels of the project.
4. Within the "Subscription Information" box that addresses the term of the Subscription Agreement, that the new Traditional Community Solar Disclosure Form (DF) allow for AV's and Designees to insert the ability to offer subscriptions in months instead of just years. In other words, a 1-year term is listed as 12 months and a 2-year term is listed as 24 months such that if the Term was 2.5 years, the term could be listed as 30 months on the Disclosure Form which would allow for any potential term that the AV or Designee wanted to offer.
5. MC2 recommends that within the blue box with the heading **Commented [A3]**, that the 3rd and 4th bullets should be changed to state as follows:
 - **"Payment equal to Subscriber's monthly community solar production allocation in kWh's multiplied by X.xx cents/kWh"**
 - **"Payment equal to Subscriber's monthly community solar production allocation in kWh's multiplied by X.xx cents/kWh with annual escalation rate"**

Regards,
Sharon Alegado
Manager – Regional Sales & Community Solar
Office [REDACTED]
Community Solar [REDACTED]



where **energy** comes from

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From: Herrera, Andrea [REDACTED] **On Behalf Of** IPA.ContactUs
Sent: Tuesday, December 20, 2022 10:51 AM
To: Sharon Alegado [REDACTED]; IPA.ContactUs <IPA.ContactUs@Illinois.gov>
Cc: MC2 Solar [REDACTED]
Subject: [EXTERNAL] RE: MC Squared Energy Services – Response to Consumer Protection Proposals

Good morning Sharon,

Thank you for submitting your feedback. While the questions raised are useful for helping the IPA think through the issues, please let us know if you have specific suggestions / preferences as part of your feedback and submit them before December 30, 2022.

Best,
Andrea Herrera
Program Associate

From: Sharon Alegado [REDACTED]
Sent: Tuesday, December 20, 2022 10:27 AM

To: IPA.ContactUs <IPA.ContactUs@Illinois.gov>

Cc: MC2 Solar [REDACTED]

Subject: [External] MC Squared Energy Services – Response to Consumer Protection Proposals

Dear IPA Administrator,

We appreciate the opportunity to provide feedback regarding the Disclosure Forms and Consumer Protection Proposals. Below is a list of our feedback / questions. Please feel free to reach out if you have any questions or need additional clarification. Also, would you mind adding [REDACTED] to your consumer protection working group email distribution list?

1. Will the Illinois Shines Program brochure be included (or incorporated) into the top of the new IPA Disclosure Form or will we (as the AV or Designee) be required to add it to the top of the DocuSign signature stack?
2. Does the requirement to define and insert insurance related language apply to the future traditional community solar subscription agreements? (See Proposal #11 box below)
3. How do we define “ensures no unreasonable decrease in production”? What is the basis or definition of a reasonable production level? (See Proposal #11 box below)

Proposal # 11 - Community Solar Contract Requirements – Insurance and Maintenance

- For the duration of their participation in either Program, community solar providers must:
 - Hold full cost-of-replacement insurance; and
 - Have and implement a maintenance plan for community solar projects that ensures no unreasonable decrease in production.

4. “Term of your subscription” is this a decimal version of years or will it allow for months in the off chance of offering partial years? Meaning is it free form text or just a single number entry stated in years only?

Subscription Information			
Subscription size <i>(may vary by 5 kW or 25%)</i>	X.xx kW AC	Estimated first year production <i>(production level will decrease over time)</i>	Xx,xxx kWh
		Guaranteed minimum level of production	<<no guarantee>> OR <<fill in #>>
Term of your subscription	Xx years	Estimated start date for bill credits	<<Month, Year>>

5. In the 3rd and 4th bullet it should be more clearly stated as “**monthly community solar kWh production**” instead of “monthly electricity production” to keep subscriber from confusing their monthly metered electricity consumption value in kWh as the basis for community solar credits versus the subscriber’s allocated community solar generation volumes from the project.

Commented [A3]: Drop down options would include:

- Set payment of \$xx
- Set payment of \$xx with annual escalation rate
- Payment equal to monthly electricity production multiplied by X.xx cents/kWh
- Payment equal to monthly electricity production multiplied by X.xx cents/kWh with annual escalation rate
- Payment equal to X% of community solar credits on your utility bill
- Payment equal to monthly electricity production multiplied by a variable rate

If NONE of these apply, AV/Designee can select “none” and this line will disappear and they are prompted to provide the method / formula for calculating the payment amount

Regards,
 Sharon Alegado
 Manager – Regional Sales & Community Solar
 Office [REDACTED]
 Community Solar [REDACTED]



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