



**REQUEST FOR PUBLIC COMMENT:  
New DG Disclosure Forms – Project Performance (“Efficiency”) Disclosure**

March 2, 2023

The [new Distributed Generation \(“DG”\) Disclosure Forms](#) that were [put out for public comment](#) in December 2022 (for implementation starting June 1, 2023) included a new section, titled “Project Efficiency.” The intent of the section was to provide information to customers on if their project was designed or sited in a sub-optimal way. For example, if a solar project is shaded or is sited on a northern facing roof, it is important that the customer understand the limitations of the project design and/or siting. The IPA proposed this new disclosure because it is aware that there have been projects that have been submitted in both the Illinois Shines and Illinois Solar for All programs that have relatively low performance because of siting/design issues.

In the [public comments](#), questions were raised about exactly what number would be disclosed, and how that number would be calculated.

Based on that feedback, the Agency is considering modifying this portion of the disclosure form to be framed as “Project Performance” – that is, eliminating the use of the term “efficiency” – and using the Total Solar Resource Fraction (“TSRF”) as the actual number that is disclosed.

The Agency’s understanding is that many, if not all, solar modeling software generate the TSRF as an output. Therefore, the Agency believes that requiring an Approved Vendor or Designee to enter the TSRF into the Portal as part of the Disclosure Form generation process should not create a significant burden, but is interested in feedback on if this is accurate. Additionally, the Consumer Protection Handbook already requires that an Approved Vendor or Designee “design the system, considering the site’s azimuth, orientation, and shading” before providing the customer with a Disclosure Form.

An alternative to using the TSRF could be to use a project’s capacity factor, generated automatically in the Portal by dividing the estimated first year production (kWh) by (project size in kw AC x 8760 hours/year). A concern with using capacity factor is that it varies based on geographic location and between ground-mount and roof-mounted systems, and may also need to be periodically updated based on technological advances. This creates additional complexity and may take longer to design the Portal, and may also require additional inputs from the Approved Vendor or Designee.

Below is a mock-up of how the new “Project Performance” section of the disclosure form would appear using the TSRF approach:

## Project Performance

A solar project's performance can be affected by the placement of the panels. For example, solar panels that face north, are at too steep of an angle, or are shaded by nearby trees or buildings will not produce as much electricity. The Total Solar Resource Fraction measures how optimized the project siting is, taking into account shading, tilt, and orientation.

**Estimated Total Solar Resource Fraction for your project:** XX%



**Explanation:** <<e.g., shading from neighboring building>>

Please provide feedback on this proposal generally, including the following specific items:

- Are there any significant burdens or hurdles to having the Approved Vendor / Designee enter the TSRF as a Portal input for the Disclosure Form?
- Is TSRF a readily available output in the solar modeling software the Approved Vendors and Designees use?
- What bounds should be used for poor performance, moderate performance, good performance, and excellent performance?
- Are there other comments on the mock-up?
- If there are concerns with using TSRF as a measure of Project Performance, would using Capacity Factor be a better approach? How could the Agency set bounds for poor performance, moderate performance, good performance, and excellent performance if Capacity Factor is used?

**Comments in response to this request are due on March 10, 2023.** Comments should be submitted to [ipa.contactus@illinois.gov](mailto:ipa.contactus@illinois.gov) with the subject line "[Responding Entity Name] – Response to New DG Disclosure Forms – Project Performance (“Efficiency”) Disclosure.