

**US Solar – Response to New DG Disclosure Forms –  
Project Performance (“Efficiency”) Disclosure**

Dear IPA,

US Solar respectfully submits this informal comment regarding the IPA’s revised proposal for a new Project Performance metric on the DG Disclosure Forms (“Proposal”). As an active developer of distributed generation projects under the Adjustable Block Program (ABP), we base these comments on our experience in Illinois and several other states. We appreciate the IPA’s ongoing efforts to improve the program, and to design and administer customer protection standards that are workable and not overly burdensome to customers or developers.

US Solar previously submitted comments on this issue on December 30, 2022, in response to the IPA’s request for feedback on the updated and streamlined disclosure forms. At that time, we expressed concern with the proposed project efficiency section as it would confuse customers and potentially lead to a situation where customers could be misled into paying for a system that boasts higher efficiency at the expense of reduced savings. As the disclosure form already includes metrics for estimated production and cost savings, the project efficiency section would mostly serve to further confuse customers that do not have in-depth knowledge of the way solar projects are engineered.

We acknowledge the revised Proposal as a marginal improvement over the initial version, but our overarching concern remains that this new metric would distract from the more-relevant customer metrics of estimated production and cost savings. It’s also important to make sure this proposed metric doesn’t misleadingly compare apples to oranges in terms of different categories of solar projects that call for different approaches to economic optimization.

For example, a well-optimized flat roof array may score much lower on estimated performance or Total Solar Resource Fraction than a ground-mounted array with single-axis tracking, but should still be considered a “high” performance project if it scores well compared to the best system that could be installed on the flat roof site (*i.e.*, azimuth of 180 degrees, industry standard 10-degree fixed tilt). Otherwise, the metric could lead customers to question whether they are getting a good deal, despite the fact they may be getting the most efficient array their site is capable of hosting.

If the animating concern is that bad actors may install solar projects in a non-productive location or orientation, we propose simply requiring disclosure of whether the array facing a northern azimuth or obstructed by buildings, trees, or other obstacles that will impede the production of the system. This should bring awareness to even the least-knowledgeable customers and allow for a potential remedy should the disclosure later be found to have been fraudulent or in error.

Sincerely,

s/ Ross Abbey

Ross Abbey

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