

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, June 2, 2023

Poll Question Series 1:

Which marketplace participant best describes you?	32 of 44 participants
Approved Vendor	30% (10/32)
Designee	24% (8/32)
Consumer	0% (0/32)
Government Agency	27% (9/32)
Non-Profit Advocacy/Community Group	12% (4/32)
Prospective Approved Vendor/Designee	0% (0/32)
Other	6% (2/32)

TOPIC 1	Feedback on Situations Requiring Generation/Signing of New Disclosure Forms
BACKGROUND	<p>A key consumer protection requirement in both the Illinois Shines and Illinois Solar for All programs is the standard Disclosure Form. Both programs require that all customers receive and sign a standard Disclosure Form before signing their installation contract (for distributed generation) or subscription (for community solar). The purpose of the Disclosure Form is to provide clear, consistent information to the customer about the Program, the specific offer by the Approved Vendor/Designee, and consumer rights. The Programs require Approved Vendors/Designees to obtain a second signed Disclosure Form in certain instances when there are material changes to the information contained on the original Disclosure Form, i.e., in DG, when the AC size of the system change by more than the greater of 5% or 1kW.</p> <p>The Program Administrator is considering providing additional guidance on which situations trigger the requirement to generate (and have signed) an updated Disclosure Form.</p>
ISSUES/ QUESTIONS TO DISCUSS	<p><i>Discussion questions:</i></p> <ul style="list-style-type: none"> ○ <i>What are the common situations experienced by Approved Vendors and Designees that currently require new Disclosure Forms to be generated and signed? Have Approved Vendors and Designees encountered situations where it was unclear whether a new Disclosure Form was required? If so, what were those situations?</i> ○ <i>What feedback have agencies, advocacy groups and other stakeholders received from consumers on the requirements surrounding the need to re-sign Disclosure Forms in certain situations?</i>

	<ul style="list-style-type: none"> ○ <i>Are there situations requiring new Disclosure Forms that stakeholders believe should not require Disclosure Forms in the future? If so, what are these situations?</i>
MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> ● One community solar AV relayed a concern that when customers move (but stay within the service territory), the need to generate a new Disclosure Form given the new utility account number sometimes results in customer frustration and customer requests to terminate their subscriptions. ● Some community solar AVs and Designees reported encountering challenges when a customer’s energy profile changes throughout their subscription term. Community solar customers sometimes request their community solar provider adjust their subscription size for various reasons (e.g., desire to use up accumulated bill credits, home usage needs fluctuating due to long vacations or visitors). Some community solar AVs and Designees stated that requiring the customer to sign a new Disclosure Form in these situations is burdensome on the customer and suggest more flexibility in the Program requirements to account for this. ● The Agency received feedback from an AV supporting the requirement that the customer sign a new Disclosure Form if the AC size changes by more than the greater of 5% or 1 kW. Some stakeholders stated that the process would be easier if there was the ability in the new portal to edit a Disclosure Form after submission. The IPA noted that the Program Administrator is building out the functionality to “clone” and create a new Disclosure Form from an existing Form. ● One AV explained that API functionality would help it ensure the integrity of the data entered by its Designees.

TOPIC 2	Potential Disclosure Form Efficiencies
BACKGROUND	<p>On May 18, 2023, the Program Administrator hosted a webinar focusing on the June 1, 2023, rollout of the updated Disclosure Forms in the portal. The updates to the Disclosure Form were made to streamline the Disclosure Forms, create new consumer protection requirements, and clarify existing requirements. Both during and after the webinar, the Program Administrator received feedback requesting that the Program Administrator consider developing additional efficiencies or functionalities related to Disclosure Forms.</p> <p>For example, one entity requested the ability to duplicate entries in certain fields from one Disclosure Form to the next to save time by re-entering identical information.</p>

	<p>The Program Administrator seeks input from Approved Vendors and Designees on potential additional efficiencies or functionalities that could be considered in the future for Disclosure Form completion.</p>
<p>ISSUES/ QUESTIONS TO DISCUSS</p>	<p><i>Discussion question:</i></p> <ul style="list-style-type: none"> ○ <i>What changes to the Disclosure Form portal functionality do market participants want considered in order to improve efficiency in completing the Forms?</i>
<p>MEETING MINUTES</p>	<p>Helpful links regarding new Disclosure Forms:</p> <ul style="list-style-type: none"> • Disclosure Form Deep Dive • Video resource/tutorial for AVs/Designees in filling out these Disclosure Forms <p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> • Stakeholders suggested having the ability to auto-fill Disclosure Forms with specific content. • AVs and Designees expressed desire to be able to edit a submitted Disclosure Form. The Program intends to build out the ability to duplicate a Disclosure Form and edit that new form (with a new Disclosure Form ID). • One AV suggested the Program announce when CSV templates are updated, as using the non-updated versions may result in errors when generating Disclosure Forms.