

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, September 1, 2023

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	
Designee/Nested Designee	
Consumer	
Government Agency	
Non-Profit Advocacy/Community Group	
Prospective Approved Vendor/Designee	
Other	

TOPIC 1	Draft 2024 Long-Term Plan
BACKGROUND	<p>On August 15, 2023, the Illinois Power Agency released the draft 2024 Long-Term Plan for public review and comment. The draft 2024 Long-Term Plan details the goals and strategies for the IPA’s renewable energy programs and procurements, including program capacity and renewable energy credit pricing for the Illinois Shines and Illinois Solar for All programs over the 2024-2025 and 2025-2026 Program Years.</p> <p>The IPA will hold virtual public hearings for the draft 2024 Long-Term Plan on Friday, September 15, 2023. Public comments on the draft 2024 Long-Term Plan are due on Friday, September 29, 2023.</p> <p>The August 15 announcement outlined some of the major proposed changes to each Program. A redline version of the proposed edits can be found here. The main Consumer Protection-related proposed updates can be found in Sections 7-9 and include the following:</p> <ul style="list-style-type: none"> • Implementing Designee annual renewal requirements by late 2023 (p. 430 - redline) • Empowering the Program Administrator to apply formal discipline of an entity to affiliate companies that share at least 25% ownership or have at least 50% common managers or staff (p. 435 – redline) • Developing an economic incentive (in the form of a Renewable Energy Credit adder) for Stranded Customer Projects (when a customer has already signed a contract with a solar company and then the company goes out of business or is prevented from moving forward with the project for reasons such as disciplinary action) (p. 440 - redline) • Implementing an escrow process for Approved Vendors that do not pass through promised incentive payments (p. 443 - redline)

	<ul style="list-style-type: none"> • Adding flexibility to “unbatch” projects after ICC approval of REC contracts to assist harmed customers (p. 446 – redline) • New requirements for community solar providers who require customers to sign an agency agreement giving authority to the provider to take over management of the customer’s utility account (p. 453 – redline) • Developing of a solar restitution fund to assist customers who have been harmed through participating in Illinois Shines or Illinois Solar for All (p. 475 – redline) <p>The Program Administrators and IPA note the above proposed amendments to the Long-Term Plan to encourage stakeholders to provide written feedback by the September 29, 2023, deadline.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>What questions do meeting participants have on the process that led to the draft 2024 Long-Term Plan?</i> • <i>What questions do meeting participants have about the written feedback process and deadlines and the process leading up to finalization of the 2024 Long-Term Plan?</i>

Poll Question 2:

Are meeting participants planning to provide written feedback to the IPA on one or more aspects of the draft 2024 Long-Term Plan?	
Yes, I (or the entity I represent) plan(s) to provide feedback	
Unsure currently	
No, I (or the entity I represent) do(es) not plan to provide any feedback	

TOPIC 2	Market use of e-signature systems and software to obtain customer signatures
BACKGROUND	<p>Section 5(A) of the Program Guidebook discusses the ability for Approved Vendors and Designees to use e-signature systems to obtain customer signatures for Disclosure Forms. The Guidebook states that, “Approved Vendors and Designees may employ commercially available third-party e-signature systems for customer signature of the Disclosure Form but must submit the audit/signature information page with the e-signed Disclosure Form.” Further, the Guidebook states that, “[t]he Disclosure Form should be completed after system design (for DG systems) and must be delivered to the customer and signed by the customer before the customer signs that project’s installation contract or subscription agreement, in the case of community solar.” Finally, the Guidebook requires that an Approved Vendor or Designee “review the Disclosure Form with the customer and provide the customer with an opportunity to ask questions about the Disclosure Form prior to obtaining a signature from the customer. The customer must sign the Disclosure Form prior to signing the installation agreement or</p>

	<p>subscription agreement.”</p> <p>The Program Administrators are interested in learning how Approved Vendors and Designees are operating to ensure compliance with the above requirements regarding Disclosure Forms.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none">• <i>What practices are Approved Vendors and Designees using to ensure customers are signing Disclosure Forms before signing installation contracts or subscription agreements?</i>• <i>To what extent do Approved Vendors or Designees provide Disclosure Forms and installation contracts/subscription agreements to customers at the same time? If so, how do they ensure the customer signs and returns the Disclosure Form <u>before</u> (or at the same time as) signing and returning the installation contract/subscription agreement?</i>• <i>For Approved Vendors and Designees using a third-party e-signature platform, are customers and sales representatives e-signing separately via their own email addresses, or are there alternative ways representatives are obtaining customer signatures?</i>• <i>What feedback are today’s meeting attendees hearing from consumers about reviewing and asking questions about Disclosure Forms before being asked to sign the Form?</i>