EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, June 7, 2024

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	17 of 40
Designee/Nested Designee	5 of 40
Consumer	0 of 40
Government Agency	11 of 40
Non-Profit Advocacy/Community Group	5 of 40
Prospective Approved Vendor/Designee	0 of 40
Other	2 of 40

TOPIC 1	**Seeking preliminary input from stakeholders on Renewable Energy Credit ("REC") adder values**
BACKGROUND	Section 9.4.2.1.1. of the 2024 Long-Term Plan ("2024 LTP") describes a new initiative to facilitate additional support for customers who have become "stranded" (when the customer has already signed a contract with a solar company, and then the Approved Vendor or Designee goes out of business or is otherwise prevented from moving forward with the project due to issues such as disciplinary action). The new initiative is necessary both because of the inherent complexity associated with assisting some stranded projects, as well the growing number of stranded customers. As described in the 2024 LTP, the Agency has heard that assisting stranded customers may be complicated and/or unattractive to Approved Vendors and Designees as the customer's project could be partially installed (requiring a new company to complete the installation), application submission can require obtaining documentation from the former Approved Vendor or Designee, etc. Additionally, the number of stranded customers continues to increase and the current number of entities on the Program Administrator-created Stranded Customer Shortlist may not be able to take on the growing number of stranded customers. In the 2024 LTP, the Agency announced it will "implement an economic incentive for Approved Vendors that assist stranded customers in the form of a 'REC adder' – that is, an increased price in the REC Contract for RECs generated by projects that were stranded and then 'unstranded.'" The Agency further explained that it would engage in a stakeholder feedback process and would begin with "developing categories of stranded customers, based on the specific types of situations in which customers are stranded," and then determine the "specific REC 'adder' amount for each category of customer, either as a percentage increase or an absolute dollar amount." While the Program Administrators will engage in a written stakeholder feedback process later in 2024, we are interested in gaining preliminary feedback on stranded customer categories and associated REC adder values.
ISSUES/	• What level of granularity should be used in creating customer categories?

QUESTIONS TO DISCUSS	Should there be a higher number of categories to tailor the amount of the REC value to different situations, or should there be fewer categories for simplicity / ease of administration? • What initial feedback do stakeholders have on the draft customer categories circulated to the Working Group members? • What approaches could the IPA use in setting the value of REC adders for different categories? What are the benefits and drawbacks of different approaches?
MEETING MINUTES	In response to a question, the Program Administrator clarified that the REC adder is intended to incentivize Approved Vendors and Designees to assist stranded customers, not to compensate stranded customers for costs incurred from being stranded. Stakeholder feedback included: • Multiple participants agreed that the draft categories circulated to the Working Group members aligned with their expectations. • One participant stated that a factor to consider in REC adder valuation is the risk associated with a new provider assuming responsibility for a different company's work – especially if the system is underperforming. • One participant expressed concern that the economic incentive of the 'REC adder' could enable customers to choose the lowest bid of solar providers, rather than doing their due diligence, because they would be "protected" if they were to become stranded.

TOPIC 2	**How Approved Vendors and Designees are communicating upcoming changes to Net Metering in Illinois and how the Program Administrator should modify Disclosure Form calculations to reflect changes**
BACKGROUND	"Net metering" is when a utility credits a customer's bill for all or some of the production of a distributed generation that has been exported to the distribution grid. For owners of a residential solar array, this means that when the array is generating more power than the household requires, the owner can sell the excess electricity to the utility and, in return, receive credits on their electric bill. Currently, ComEd, Ameren, and MidAmerican provide "full retail rate" net metering, which means that the customer is credited for electricity sent back to the grid at the full retail rate. Effective January 1, 2025, net metering in Illinois for ComEd, Ameren, and MidAmerican will change such that net metering credits will *only* be calculated for the *supply portion of a customer's bill*. Per ILCS Section 16-107.5(j), "eligible customers registered for net metering before January 1, 2025 shall continue to receive net metering services. . . [however], [o]n and after January 1, 2025, any eligible customer that applies for net metering" and would have previously been qualified for full net metering, will only be qualified for net metering on the supply portion of their bill. In other words, regardless of the amount of electricity delivered to the grid, customers will pay delivery charges for the gross amount of electricity pulled from the grid. Customers may also be eligible for DG/Smart Inverter rebates.

	The Program Administrators are hoping to understand how Approved Vendors and Designees are communicating the changes to net metering to potential new customers and how they are training sales agents on the same. The Program Administrators are also interested in any questions stakeholders have on the upcoming changes and input they may have on potential changes to Disclosure Forms regarding the changes.
ISSUES/ QUESTIONS TO DISCUSS	• *How are Approved Vendors and Designees communicating the upcoming changes to net metering to potential customers?* • *What questions are Approved Vendors and Designees receiving from potential – and existing – customers about these changes?* • *What questions are other stakeholders such as consumer advocacy groups receiving from customers on the changes to net metering in Illinois?* • *What questions do stakeholders have about the changes and where have they sought answers to these questions to date?* • *How should the Disclosure Form savings calculations be changed to reflect the change in net metering policy?*
MEETING MINUTES	Stakeholder feedback included: • One participant relayed that it informs potential customers that there are changes coming for net metering, but explained that the value proposition can be very different for different projects/customers. • Another stakeholder is careful about making representations to potential customers about whether projects will be able to receive full retail rate net metering

TOPIC 3	**Follow-up discussion on ComEd billing system issues**
BACKGROUND	Section VI.B.2 of the Consumer Protection Handbook states, in part, that “[f]or community solar subscriptions with regular (e.g., monthly) bills, where the customer receives a bill from the Community Solar Provider (i.e., does not pay for the subscription on their utility bill), the following requirements apply if there are disruptions in the normal timing of bills. . . . If a community solar subscription bill is going to be provided to the subscriber more than 15 days later than the normal bill statement date, the Community Solar Provider must provide notice to the subscriber, using the same method of delivery (e.g., email, United States Postal Service mail, etc.) as the customer’s bills, that: • Explains that the bill is delayed; • States whether the customer may be billed for multiple billing cycles at one time; • Provides any additional available information about the timing of the bill; • States that if the customer is billed for 3 or more billing cycles (for Illinois Shines customers) or for 2 or more billing cycles (for ILSFA customers) at one time (or within a single 30-day period), the customer may contact the Community Solar Provider to enroll in a payment plan; • Provides contact information for customers to request a payment plan; and • Explains that enrolling in a payment plan will not require interest payments or other penalties.”

	During the May 3, 2024, Expanded Consumer Protection Working Group meeting, several participants mentioned concerns with community solar credits not appearing on customer bills because of ComEd's new billing system. The participants relayed that community solar providers consequently were unable to bill customers and they were concerned about the potential that customers would receive large subscription bills once credits were applied to customer accounts. A Working Group participant requested we discuss updates to this issue and related Program requirements in the Consumer Protection Handbook.
DISCUSSION	The Program Administrator and Agency will provide general information related to the above topic and will then open the meeting for discussion from participants related to this topic.
MEETING MINUTES	Stakeholder feedback included: • Multiple community solar providers noted that they have been in contact with and receiving updates from ComEd. • Participants explained that there has been a delay in applying billing credits to customer accounts and in providing community solar credit reports to community solar providers.