

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, September 6, 2024

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	38% (15/39)
Designee/Nested Designee	8% (3/39)
Consumer	0% (0/39)
Government Agency	21% (8/39)
Non-Profit Advocacy/Community Group	21% (8/39)
Prospective Approved Vendor/Designee	0% (0/39)
Other	13% (5/39)

TOPIC 1	Approved Vendor and Designees practices to ensure customer contracts comply with Program requirements
BACKGROUND	<p>Both Illinois Shines and Illinois Solar for All set out requirements for the contract between the solar provider and the customer. The current Contract Requirements for Illinois Shines can be seen here for both Distributed Generation and Community Solar; and current versions for ILSFA can be seen here for both Distributed Generation and Community Solar.</p> <p>The Contract Requirements include certain information that must be included in contracts for all business models, as well as required information for contracts with specific business models (purchase, lease, power purchase agreements). Approved Vendors in both programs must attest to compliance with the Contract Requirements during the project application process.</p> <p>While many of the contract requirements include information also on the Programs' standard Disclosure Forms, it is critical that this information is included in the contract with the customer given the contract's binding nature.</p> <p>The Program Administrators and the Illinois Power Agency are interested in learning more about how Approved Vendors and Designees of each Program ensure that their customer contracts remain compliant with Program contract requirements.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>How do Approved Vendors and Designees ensure their Program contracts for each type of business model they offer adhere to the current contract requirements?</i> • <i>Do any participating Approved Vendors or Designees have standard contract offers for the Programs? If not, to what extent are contracts customized?</i> • <i>Do Approved Vendors and Designees that provide services outside of Illinois alter standard contracts to adhere to Illinois Shines and ILSFA program requirements?</i>

	<ul style="list-style-type: none"> • <i>Do any participating Approved Vendors or Designees utilize an internal review or checklist prior to issuing a contract to a customer to ensure compliance with Contract Requirements?</i>
MEETING MINUTES	<ul style="list-style-type: none"> • Multiple participants agreed that a checklist including Illinois Shines contract requirements would be helpful to Approved Vendors and Designees when initially creating a contract. If such a list becomes available, multiple participants suggested the checklist highlight any contract requirements that have changed from previous Program years so that edits to contracts can be made to come into compliance with new requirements. • Two participants said they use the existing contract requirements documents as checklists and thought it would be duplicative if the Program Administrator developed a separate checklist. • One participant suggested that a checklist could be included in the Program Guidebook or Consumer Protection Handbook so that Approved Vendors and Designees can easily find this document.

TOPIC 2	Stakeholder feedback due today for Net Metering language changes on the Disclosure Forms; Upcoming stakeholder feedback for three new Consumer Protection Initiatives
BACKGROUND	<p>On August 21, 2024, the Agency and Program Administrators released a request for stakeholder feedback on a proposal to update Distributed Generation Disclosure Forms for both Illinois Shines and Illinois Solar for All programs. The purpose of the updates is to reflect the upcoming January 2025 change for residential and small commercial customers from “full retail rate” net metering to “supply only” net metering in the ComEd, Ameren, and MidAmerican service territories.</p> <p>The announcement further explained that the Disclosure Form updates would change the approach for calculating the value of electricity from solar projects and would add new fields for information about batteries (including size and information about the utility storage rebate). The full stakeholder feedback explanation document can be viewed here.</p> <p>The Program Administrator notes here that the deadline to respond to this stakeholder feedback request is today, September 6, 2024.</p> <p>Additionally, the Agency and Program Administrators want to briefly preview that they expect to release stakeholder feedback in the coming weeks on the three new Consumer Protection initiatives outlined in the 2024 Long-Term Plan: a) Escrow process for Renewable Energy Credit (“REC”) payments to customers; b) REC adder incentive to assist Approved Vendors who support stranded customers; and c) Solar Restitution program (initially aimed to provide assistance to customers whose Approved Vendors failed to pass-through promised REC payments to the customers).</p>

	<p>Given the potential positive impact of all three of these new initiatives on the increasing number of stranded customers in the Illinois Shines program, the Agency and Illinois Shines Program Administrator are hopeful to receive feedback from as many interested parties as possible so these initiatives can be crafted in a way that will both provide needed support to customers and encourage Approved Vendors and Designees to assist stranded customers.</p>
<p>ISSUES/ QUESTIONS TO DISCUSS</p>	<ul style="list-style-type: none"> • <i>Do any stakeholders have feedback on the proposed Disclosure Form updates that they would like to provide verbally during this meeting?</i> • <i>Do stakeholders have any questions about the upcoming feedback processes for the new consumer protection initiatives (escrow process, stranded customer REC adder, and restitution program)?</i>
<p>MEETING MINUTES</p>	<ul style="list-style-type: none"> • One participant suggested the Disclosure Form include language explaining that Approved Vendors and Designees may have differing estimation methods than what is used on the Disclosure Form. • One participant requested that the Program ensure there is no gap in Disclosure Form availability during the roll out of the new Disclosure Form changes and requested the Program Administrator provide the final updated Disclosure Forms well in advance of the date of implementation so those entities using Application Programming Interface (API) can integrate the changes in their own API. • The same participant suggested the Program Administrator host a webinar or release a guidance document prior to launch to assist stakeholders with a smooth transition.