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September 6, 2024

Sunnova appreciates the opportunity to provide feedback on the proposed changes to Illinois Shines and Illinois Solar For All distributed generation disclosure forms. Founded in Houston, Texas in 2012, Sunnova is a leading adaptive energy services company. Sunnova has a network of independent dealers and more than 430,000 customers across 51 U.S. States and Territories.

Sunnova appreciates that the use of standardized assumptions and calculations can be a tool for consumers to use in comparing offers from solar and storage providers. However, Sunnova understands and wishes to confirm that the standardized assumptions and calculations required in the disclosure are not intended to prohibit a provider from supplying to consumers other reasonably based non-misleading calculations and assumptions.

Additionally, Sunnova proposes that the disclosure include language informing consumers that there may be other reasonable assumptions and calculations and that solar and storage providers may share those assumptions, calculations, and projections based on those assumptions and calculations, outside of the mandated disclosure form, provided they are reasonable and not misleading. Sunnova suggests that official language to this effect will help avoid the erosion of consumer confidence that might otherwise occur if providers share additional estimates and consumers are not informed that the practice is permissible.