

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, October 4, 2024

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	37% (11/30)
Designee/Nested Designee	17% (5/30)
Consumer	0% (0/30)
Government Agency	27% (8/30)
Non-Profit Advocacy/Community Group	7% (2/30)
Prospective Approved Vendor/Designee	0% (0/30)
Other	13% (4/30)

TOPIC 1	Market trends on offering battery storage to Illinois Shines and ILSFA customers
BACKGROUND	<p>The Program Administrators and Agency understand that with the upcoming changes to the residential and small commercial Net Metering offerings by ComEd, Ameren and MidAmerican, there may an increase in customer demand for battery storage components with their projects and/or market product offerings including a battery storage component. As was discussed during the September 6, 2024, Expanded Consumer Protection Working Group, the Agency and Program Administrators are preparing updates to the Distributed Generation Disclosure Forms for both Illinois Shines and Illinois Solar for All that will include, amongst other updates, new fields for information about batteries (including size and information about the utility storage rebate).</p> <p>The Agency and Program Administrators are interested in hearing feedback from the market on customer demand for battery storage, whether Approved Vendors and Designees currently offer – or are planning to add to their offerings – battery storage for customers, what questions and/or concerns customers express with these offers, and potential market pressures on battery storage supply.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>Have Approved Vendors and Designees seen any changes in customer demand for battery storage options?</i> • <i>What kinds of questions are Approved Vendors and Designees receiving from customers on battery storage for their systems?</i> • <i>What market pressures are Approved Vendors and Designees seeing (if any) that are impacting their decision to offer battery storage to customers?</i> • <i>Are Approved Vendors and Designees tying battery storage offerings to the upcoming changes from “full retail rate” to “supply only” net metering with ComEd, Ameren and MidAmerican?</i>
MEETING MINUTES	<ul style="list-style-type: none"> • The IPA reminded participants that the announcement on new Portal fields regarding batteries can be found at the following link:

	<p>https://illinoisshines.com/disclosure-form-updates-new-fields-launching-in-october/</p> <p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> • Customers who take the utility’s DG storage rebate are switched to a more complex electricity rate. • Batteries can be used in different ways, such as back-up power in the case of outages, versus use to maximize economic benefit from the solar project. • Changes in net metering policy in Illinois are not as drastic as the changes in California and may not make batteries as important as in California for the solar project to provide economic benefits. • A suggestion that Disclosure Forms require entities to confirm that the requirement to switch to real time / hourly pricing was discussed with customers who will take the DG storage rebate.
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TOPIC 2	Approved Vendor and Designee Participation in ILSFA
BACKGROUND	<p>A recurring concern raised by consumers and Grassroots Educators related to ILSFA is the inability of prospective customers to find an Approved Vendor that participates in ILSFA and is taking on new customers. While the Agency and ILSFA Program Administrator have taken steps to try to encourage participation—including, for example, the two pilot programs Bright Neighborhoods and the Home Repairs and Upgrades Pilot—we are interested in hearing about unaddressed barriers to participation, and whether there are any new barriers. In particular, we are interested in whether Approved Vendors and Designees have concerns about impacts of net metering changes* and/or low-income discount electricity rates on the ability to meet ILSFA savings requirements.</p> <p>Relatedly, the ILSFA Program Administrator has limited visibility into which entities that are registered as ILSFA Approved Vendors and Designees are actually currently active and taking on new customers.</p> <p>*New residential and small commercial net metering customers in 2025 in ComEd, Ameren, and MidAmerican service territories will receive “supply only” net metering instead of the current full retail rate net metering.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>What do solar companies and other stakeholders see as the primary barriers to participating in ILSFA as an Approved Vendor or Designee?</i> • <i>Do stakeholders have ideas about ways to remove or reduce barriers and encourage greater participation in ILSFA, especially in the residential subprograms?</i> • <i>How are stakeholders thinking about the change in net metering and the upcoming low-income discount electricity rates and possible implications for ILSFA?</i> • <i>What approaches could the ILSFA Program Administrator use to gain better visibility into which Approved Vendors and Designees are active? Should the Program Administrator check in with Approved Vendors and Designees monthly? Quarterly?</i>

MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none">• Several stakeholders agreed that barriers for participation as an Approved Vendor in ILSFA include the financial risk, including from the utilities' approach for including community solar subscription fees on the utility bill• Comments that barriers for ILSFA customers include complexity of Program participation, including income verification.• Stakeholders stated that ways to reduce barriers and encourage greater participation in ILSFA (specifically in the residential subprograms) is to enhance consumer education and consolidate the income verification/application process.• One stakeholder suggested that for the ILSFA Program Administrator to gain better visibility into the activity statuses of Approved Vendors and Designees, quarterly check-ins may help but, ultimately, it should be the entity's responsibility to keep the Program Administrator updated. This participant also noted that ILSFA's 'Find a Solar Provider' page should be very clear about which solar providers are actively taking on new projects.
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