

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, December 6, 2024

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	31% (12/39)
Designee/Nested Designee	13% (5/39)
Consumer	3% (1/39)
Government Agency	26% (10/39)
Non-Profit Advocacy/Community Group	21% (8/39)
Prospective Approved Vendor/Designee	0% (0/39)
Other	6% (3/39)

TOPIC 1	Feedback on market use of installation and finance bundled offers and potential requirement for finance company to register as Designees with Program
BACKGROUND	<p>Section 2.G of the June 3, 2024, Program Guidebook explains that for the purposes of “Designee registration, the term ‘Designee’ refers to third-party (i.e., non-Approved Vendor) entities that have direct interaction with end-use customers on behalf of an Approved Vendor or another Designee.” Currently, the types of Designees listed in the Guidebook include “installers, entities that perform maintenance and repair, marketing firms, community solar subscriber agents, lead generators, and sales organizations.”</p> <p>Over this calendar year, the Program Administrator has heard from several customers that some registered Approved Vendors and Designees are providing offers to customers that bundle installation (by the Program entity) and financing (by a third-party finance company). While the Program does not currently require third-party financing companies to register as Designees with the Program, the Illinois Power Agency and Program Administrator are considering whether to require such registration in the future.</p> <p>The Agency and Program Administrator are interested in feedback from the market on how widespread such bundled offers are, how these offers are explained to customers, the relationship between the Program entity and third-party finance company, and feedback stakeholders have received from consumers on this matter.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>How are stakeholders structuring their offers when the offers include financing through a third-party financing company?</i> • <i>What information about the third-party financing offer are Program entities providing customers prior to contract signing?</i> • <i>Are customers informed before contract signing that they are permitted to seek financing from a different company other than the preferred financier of the Approved Vendor or Designee?</i> • <i>What do Program entities inform customers about the relationship between</i>

	<p><i>the Approved Vendor/Designee and the preferred finance company?</i></p> <ul style="list-style-type: none"> • <i>What feedback have stakeholders received from customers regarding their understanding of their financing options and their dealings with financing companies related to their Illinois Shines projects?</i>
MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> • One stakeholder suggested that in deciding which entities should be required to be registered, the Program should consider entities' level of expertise with the Program. • One stakeholder provided feedback that while installers may present a preferred financier, they may also present additional financing offers so customers do not feel pressure to choose one over another. • One stakeholder provided feedback that Approved Vendors/Designees may not yet know who the financier will be when the customer signs their contract. • One stakeholder supported the idea that financiers might need to register with the Program as Designees.

TOPIC 2	Feedback on complaint investigations and mediation of disputes between Approved Vendors and customers
BACKGROUND	<p>The Program Administrator for the Illinois Solar for All (ILSFA) program is soliciting constructive feedback on ways the Program Administrator can productively engage with Approved Vendors (AV) during the investigation of customer complaints, as well as to reduce complaints.</p> <p>Although it is not the norm, occasionally conflicts between customers and Approved Vendors do arise. Alongside the Program's priority to protect customers, the Program Administrator also strives to be unbiased in its investigations and to assist Approved Vendors in complying with requirements and being successful in the Program.</p> <p>The Program Administrator is interested in feedback on how to prevent potential customer misunderstandings and other issues that may cause difficult situations. The Program Administrator is also interested in feedback on mediating or diffusing difficult situations between Approved Vendors and customers in a reasonable and fair manner.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>To what extent do conflicts arise with customers, and how often is it related to customers not fully understanding their offers or contracts? How can the Program better enhance or support customer education? What steps do Approved Vendors take to prevent miscommunications or unreasonable expectations?</i>

	<ul style="list-style-type: none"> • <i>How can the Program Administrator ensure that AVs feel supported and not alienated, while also appropriately investigating customer concerns and complaints?</i> • <i>What strategies should the Program Administrator use to mitigate AV-customer tensions when they arise?</i> <ul style="list-style-type: none"> ○ <i>What are some best practices to mediate or de-escalate while being fair and unbiased?</i>
<p>MEETING MINUTES</p>	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> • One stakeholder asked if the IPA was considering plans to assist customers and other Program entities when an Approved Vendor goes out of business, citing one AV’s departure from the market and the strain of being caught in the middle during complaints. • One stakeholder requested that, whenever possible during the complaints process, customers provide documentation upfront to substantiate their claim, prior to the Program Administrator engaging with the Approved Vendor/Designee on the complaint. • Some stakeholders requested the Program Administrator develop additional educational materials for customers to help them better understand the Illinois Shines program. Some suggested topics for additional educational materials included REC contracts and what happens in the event a home is sold. • One stakeholder provided feedback that the ILSFA process can be challenging and lengthy, and that the duration of the process may not be clear up-front to the customer.