



Illinois Power Agency
Energy Solutions, Program Administrator



Comments on Program REC Contract Modifications

Carbon Solutions Group (“CSG”) will be providing comments on the *Escrow Process for Approved Vendors*. These comments focus on i) the escrow process initiation threshold, ii) the timeline for responses to customer complaints, and iii) the escrow agent’s accommodation of Approved Vendor (“AV”) service fees. CSG greatly appreciates the opportunity to provide stakeholder feedback on this process.

Escrow Process for Approved Vendors

Amend the appeals process and timeline to ensure an effective customer complaints pathway.

When it comes to customer complaints, AVs should be given a standard appeals process, clearly outlined by the Program, in order to effectively verify that all complaints are valid. Valid complaints would be defined as those complaints thoroughly investigated by the Program, prior to those complaints qualifying as a trigger for the Escrow Process initiation.

Modified REC contracts specify that the Escrow Process will only be initiated after the AV is given sufficient time to respond to complaints and demonstrate that its actions do not pose unreasonable risk. CSG believes that the contract language should explicitly define a minimum timeline for response in support of this provision and in order to avoid unnecessary ambiguity. In short, the standard appeal process should incorporate an allotted timeframe within which AVs may appeal complaints that AVs believe to be inaccurate and/or unsubstantiated.

CSG recommends allowing a minimum of 45 days for AVs to respond to an initial complaint. This timeline provides a reasonable opportunity for AVs to investigate and resolve issues, while still respecting the need for timely resolution.

Additionally, if a customer does not adequately, or entirely, respond to an AV’s reply to the initial complaint, the validity of that open complaint should expire after a certain period of inactivity, such as 45-days after the AV’s last attempt to contact the customer. This ensures that unresolved complaints are not held against the AV when the customer is unresponsive to the AV’s attempts to resolve the issue.



Escrow payments should be netted to accommodate for Approved Vendor service fees.

Often, CSG retains a portion of the REC incentive payment owed to the customer as part of our internal fees (e.g. a 20% approved vendor service fee) which is disclosed on the standard disclosure form. We recommend that the Escrow Agent account for these fees when determining the payment amount owed to customers. Rather than passing through 100% of the REC payment, the Escrow Agent should ensure that customers receive their entitled payment net of any contractual service fees agreed upon between the customer and the Approved Vendor.

Once again, we thank the Program for the opportunity to provide feedback. CSG appreciates your diligence, intelligence, and efforts invested in the continuous updating of the Program.

Sincerely,

Dylan DeBiasi