

Illinois Power Agency

Consumer Complaints & Disciplinary Actions

Illinois Shines & Illinois Solar for All

CONSUMER COMPLAINTS & DISCIPLINARY ACTIONS ANNUAL REPORT 2024

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1. Introduction

The Illinois Power Agency (“IPA” or “Agency”) committed in its initial Long-Term Renewable Resources Procurement Plan (“Long-Term Plan” or “Plan”) to “provide an annual written report to the [Illinois Commerce] Commission (“the Commission”) documenting the frequency and nature of complaints” related to the Illinois Shines program (the “Program”) and Illinois Solar for All (“ILSFA”), collectively referred to as “Programs,” as well as “any enforcement actions taken.”¹ Since October 2019, both Illinois Shines (legislatively known as the “Adjustable Block Program”) and ILSFA allow customers to file complaints via email and telephone, and Illinois Shines also accepts complaints by webform. The Program Administrators track the complaints received and related information, including the subject of the complaint, the company against which the complaint was lodged, and resolution of the complaint.

The first annual complaint report, covering calendar year 2019, was provided to the Commission through a filing in Docket No. 17-0838 on March 2, 2020. The Agency filed subsequent annual reports covering calendar years 2020 and 2021 in Docket No. 19-0995, 2022 in Docket No. 22-0231, and 2023 in Docket No. 23-0714. This annual report addresses complaints received by both Programs during calendar year 2024.

Impact of Legislative Efforts and the Passage of the Climate and Equitable Jobs Act

On September 15, 2021, Governor Pritzker signed Public Act 102-0662 (the Climate and Equitable Jobs Act or “CEJA”). This Act included significant changes to the Illinois Shines and ILSFA programs and provides funding to support both programs for the foreseeable future.

With the passage of CEJA, the annual complaints report evolved from an administrative requirement into a statutory requirement. Section 1-75(c)(1)(M)(v) of the IPA Act requires the Agency to provide an annual written report to the Commission documenting the frequency and nature of complaints arising from its programs, as well as any enforcement actions taken in response to those complaints.

Section 9.7 of the 2024 Long-Term Plan reiterates the Agency’s commitment to publication of the annual report and explains that “[the] report is a vital way that the Agency ensures transparency with the public concerning complaints received regarding program participants.”²

Consumer Protection Updates in 2024

In 2024, the Agency and Program Administrators made important updates and improvements to consumer protection materials and efforts.

In April 2024, the Agency released an updated version of the Consumer Protection Handbook³ for use in the 2024-25 Program Year commencing on June 1, 2024, for ILSFA and June 3, 2024, for Illinois Shines. Approved Vendors and Designees were given 45 days from publication to comply with the new requirements.

One significant update in the 2024 Consumer Protection Handbook included the Program Administrator’s ability, when warranted based on the specific situation, to apply formal discipline (e.g., suspension or permanent revocation of an entity’s Approved Vendor or Designee status) to

¹ [Initial Long-Term Renewable Resources Procurement Plan](#) (published August 6, 2018) at 128.

² [2024 Long-Term Renewable Resources Procurement Plan](#) (published April 19, 2024) at 343.

³ The Consumer Protection Handbook is available at <https://illinoisshines.com/wp-content/uploads/2024/04/CP-Handbook-Final-for-June-2024.pdf>.

affiliate companies that share at least 25% ownership or have at least 50% common management with the original entity receiving discipline for noncompliance with Program requirements.

Other consumer protection updates were included in the Long-Term Plan,⁴ which was published on April 19, 2024. The 2024 Long-Term Plan includes several consumer protection initiatives⁵ aimed to address specific consumer protection concerns for Distributed Generation (“DG”) customers observed by the Agency. In 2024, the Program Administrator began development of the processes that will support the consumer protection initiatives, which are expected to be implemented in 2025. These initiatives include:

1. **Stranded Customer Renewable Energy Credit (“REC”) Adder⁶** – The Program Administrator and Agency will implement an economic incentive for Approved Vendors and Designees that assist stranded customers in the form of a “REC adder”—that is, an increased price in the REC Contract for RECs generated by projects that were taken on (“unstranded”) by the Approved Vendor or Designee.
2. **Escrow Process** – The Program Administrator and Agency will develop and implement a process to require utilities to pay invoices for REC incentives to a third-party escrow agent rather than the Approved Vendor when there is a significant risk of the Approved Vendor failing to pass through promised REC payments to customers.
3. **Flexibility in Batching to Facilitate Project Reassignment** – The Program Administrator will develop a process to allow Approved Vendors the flexibility to “unbatch” projects after Commission approval of REC Contracts in limited situations as needed to facilitate reassignment of projects to new Approved Vendors, as needed to assist harmed customers.
4. **Solar Restitution Program** – This will provide economic assistance to customers who have been harmed through their participation in Illinois Shines or Illinois Solar for All. The first phase of this program will only be available for customers whose Approved Vendors failed to pass through promised incentive payment(s). Later phases would expand eligibility to customers experiencing other types of harm.

To implement the first three of the above initiatives, the Program Administrator and Agency worked with utilities and other stakeholders on amending the underlying REC Contracts between utilities and Approved Vendors to allow for these new initiatives. Publication of the final REC Contract amendment is anticipated in the first quarter of 2025, followed by execution of the amendment by the utilities and Approved Vendors, with implementation of the above initiatives following thereafter.

In accordance with the 2024 Long-Term Plan and Section 1-75(c)(1)(M)(vi) of Illinois Power Agency Act,⁷ the Agency and Program Administrators continue to hold monthly Consumer Protection Working Group meetings with Approved Vendors, Designees, consumer protection organizations, consumers, and other interested stakeholders. The Agency and Program Administrators also hold

⁴ The 2024 Long-Term Plan is available at <https://illinoisshines.com/wp-content/uploads/2024/04/final-2024-long-term-renewable-resources-procurement-plan-19-apr-2024.pdf>.

⁵ The Consumer Protection Initiatives webpage is available at <https://illinoisshines.com/consumer-protection-initiatives/>.

⁶ “Stranded customers” are DG customers whose Approved Vendor and/or Designee has gone out of business, is unable or unwilling to meet Program requirements, or is suspended because of disciplinary action and prohibited from advancing projects through the application process.

⁷ “The Agency shall schedule regular meetings with representatives of the Attorney General, the Illinois Commerce Commission, consumer protection groups, and other interested stakeholders, to share relevant information about consumer protection project compliance, and complaints received.” 20 ILCS 3855/1-75(c)(1)(M)(vi).

monthly State Agency Working Group meetings that invite feedback and discussion from the Illinois Office of the Attorney General and the Illinois Commerce Commission regarding consumer protection issues. The purpose of each of these meetings is to discuss market trends, best practices, consumer education, and consumer protection requirements and enhancements.

As in 2022 and 2023, participation and interest remained strong in the expanded Consumer Protection Working Group meetings in 2024; stakeholders continue to provide helpful feedback to the Agency and Program Administrators that have resulted in Program improvements. Some topics covered in 2024 included: exploring current market lender/Approved Vendor relationships; discussing changes to net metering and related changes to Disclosure Forms; seeking input from stakeholders on the above-mentioned new consumer protection initiatives; and the impact of recent solar business closures on Program entities' business practices.

2. Scope of Report

This 2024 Report is the sixth annual Consumer Complaint Report. Previous versions of the Report focused primarily on complaints related to the Illinois Shines program and had limited discussion of the few ILSFA complaints received.⁸ To date, there continue to be many fewer complaints related to ILSFA, and they have tended to be less serious in nature. However, with the growth of both Programs and corresponding increase in complaints, and the increased focus on consumer protection in CEJA, the Agency decided it would be appropriate to have a separate section in the 2022 Report specifically for ILSFA complaints and trends. Accordingly, the 2023 Report and this 2024 Report also have a separate section for ILSFA complaints and trends.

The scope of this 2024 Report includes complaints received by the Program Administrators of both Illinois Shines and ILSFA from January 1, 2024, to December 31, 2024, and provides summarized data on these complaints. For Illinois Shines complaints, the report includes a narrative summary of a sampling of complaints in each of the five major complaint categories. These top complaint categories, which include Illinois Shines application issues, delay/failure to pass through REC payment, mechanical or installation issue, failure to respond to customer, and installation contract terms, represent about 84% of all the complaints received. The sample complaints were selected based on how well they exemplified the category of complaint under which they fall. The Illinois Solar for All section includes a chart of each complaint received in 2024, the status, Approved Vendor, complaint subject, program type, and date opened and closed or resolved.

In addition to the summary of complaints received, this report includes a summary of suspensions issued by the Program Administrators against Approved Vendors and Designees. In 2024, the Illinois Shines Program Administrator suspended 87 entities. No suspensions were overturned on appeal by the Agency. Eight of the suspensions related to issues first brought to the Program Administrator's attention through consumer complaints.⁹ Suspensions in Illinois Shines are applied to participation in ILSFA as well. In 2024, the Program Administrator for ILSFA initiated a suspension of an entity from ILSFA for failing to maintain its status as an Approved Vendor in the Illinois Shines Program.

⁸ Prior years' reports are available at <https://illinoisshines.com/annual-complaints-reports-3/>.

⁹ Forty-seven entities were suspended for failure to comply with Minimum Equity Standard ("MES") requirements. Eleven entities were suspended for failure to timely submit a complete Approved Vendor renewal application.

The IPA strives to constantly improve and adjust Program operations to advance consumer protections, including utilizing this complaint information, which may result in changes to the content or presentation of the annual Consumer Complaints Report in future years.

3. Complaint and Disciplinary Action Process

How Complaints Are Received

When considering solar offers that are part of Illinois Shines and ILSFA, consumers receive Program-mandated materials—specifically, the Program informational brochure and Disclosure Form—that provide information on how a complaint may be submitted to the Program Administrator. When a customer wishes to lodge a complaint, they have multiple options available to them. Both the Illinois Shines and ILSFA Program Administrators accept customer complaints by telephone or email. The Illinois Shines website also has a web form that customers may use to file complaints with the Program.¹⁰ These resources create a user-friendly experience for customers seeking to file a complaint. In some cases, complaints are first submitted to the Agency rather than to the Program Administrator. In other cases, complaints may be received by another entity (e.g., a solar company, the Office of the Attorney General, the Citizens Utility Board, the Illinois Commerce Commission (“ICC”), local or municipal officials, or a state legislator); this report covers only those complaints received by the Program Administrator, whether directly or through referral from another entity. Consequently, the number of complaints received by the Programs may not reflect the totality of consumer complaints related to Illinois Shines or ILSFA. The IPA encourages any entities that receive a complaint regarding Illinois Shines or ILSFA to share the complaint with the relevant Program Administrator.

Investigation of Complaints

The Program Administrators seek to respond to and investigate all complaints as soon as possible upon receipt. After receiving a consumer complaint, the Program Administrator follows up with the complainant and the Approved Vendor and/or Designee involved to seek more information. The Program Administrators then attempt to work with the Approved Vendor and/or Designee to come to a suitable solution to the complainant’s issue. The Program Administrators record all complaints received and document steps taken toward resolution. In some cases, a complaint or the complainant’s preferred resolution is outside the scope of the Program or the jurisdiction of the Program Administrator.¹¹ However, even when the Program Administrators determine they do not have the authority to direct the Approved Vendor or Designee to take a specific action, the Program Administrators may take reasonable steps to encourage the relevant Approved Vendor or Designee to resolve a complaint as completely and satisfactorily to both the customer and the Approved Vendor or Designee as possible.

If the Illinois Shines or ILSFA Program Administrator suspects or determines that an Approved Vendor, Designee, or other entity working through the Programs is not acting or has not acted in compliance with Program requirements, the Program Administrator will notify that entity either

¹⁰ The web form is available at <https://illinoisshines.com/stranded-customer-resources/>.

¹¹ For example, complaints outside the scope of the Illinois Shines program could include complaints against Program registered companies but for systems that were not marketed the Illinois Shines incentive and are not intended to be applied to the Program.

through informal outreach¹² or a Notice of Potential Violation (“NOPV”) letter, both of which outline the problematic behavior, explain how the behavior may be noncompliant with Program requirements, and request explanatory information and/or supporting documentation on the issue. For NOPVs, after a review of any response and further investigation into the facts and circumstances of a potential violation (if necessary), the Program Administrator will determine whether a violation had occurred, and what discipline, if any, should apply to that entity, as described further below.

Disciplinary Process

Upon a determination that an entity violated one or more Program requirements, the Program Administrators may take disciplinary action against an Approved Vendor, Designee, or non-Program entity.¹³ While the IPA lacks plenary authority to restrict market activity generally, Program Administrators may limit an offending entity’s ability to participate in transactions that benefit from these state-administered incentive Programs. Disciplinary action could take the form of a corrective action, a compliance plan, a notification of warning, or a suspension from acting in the Programs. Corrective action is a direction from the Program Administrator to an entity to take specific action to correct a Program violation. A compliance plan includes direction from the Program Administrator to take affirmative ongoing actions beyond those set out in Program documents to ensure and/or monitor compliance on an ongoing basis. A formal Warning Letter notifies the offending entity of behavior that violated Program requirements and/or was otherwise problematic and directs it to stop this behavior. If the Program Administrator determines a suspension is merited, it sends a letter to that entity detailing the infraction, the terms of the suspension, and the available steps to appeal the suspension. The Program Administrators will copy any affiliated companies also registered with the Program, so they are aware of the suspension.

An Approved Vendor or Designee may appeal non-disciplinary and disciplinary actions to the IPA. To appeal to the IPA, the entity must provide the appeal in writing on company letterhead explaining its rationale for why it believes the Program Administrator’s determination is in error, as well as sharing any supporting information, documents, or communications. The IPA may request more information and materials from the entity and/or discuss with the entity to learn more about the basis for its position.

The IPA attempts to issue final determinations on appeals, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information. Further explanation of the pre-disciplinary and disciplinary processes can be found in Section 4.e below.

¹² In June 2024, the Illinois Shines Program Administrator began utilizing informal outreach, a new form of pre-disciplinary action, in certain situations to give entities the opportunity both to understand a potential Program violation and to address the potential violation before a Notice of Potential Violation is issued. Informal outreach is typically conducted when the Program Administrator becomes aware of an entity’s first apparent Program violation and the seriousness of the violation is such that it would, if confirmed, lead to a response less serious than a Warning Letter, or if it is an entity’s first apparent marketing violation.

¹³ A “non-Program Entity” is defined as an entity that is not registered as an Approved Vendor or as a Designee with the Program but has some involvement with, or markets, projects intended to be applied to the Program.

4. Illinois Shines Program Complaints

a. Consumer Complaint Data Summary

This section of the report summarizes the complaints received by the Illinois Shines Program Administrator in various displays of data. In 2024, the Illinois Shines Program Administrator received 1,117 complaints. This was a significant increase from the 302 complaints received in 2023, 257 complaints received in 2022, 165 complaints received in 2021, 77 complaints received in 2020, and 28 complaints received in 2019.¹⁴ It is important to note that a consumer's complaint may be associated with an application submitted in a prior year. While a complaint in 2019 would have been linked to either an application submitted in 2019 or one that had not yet been submitted, a complaint received in 2024 could be connected to an application submitted between 2019 and 2024, or to an application that has not yet been submitted. As the number of customers involved in the Program accumulates from year to year, this creates a larger pool of potential complainants in each subsequent year.

Additionally, the Agency and Illinois Shines Program Administrator have worked to increase communication and coordination on complaints received from the Commission and the Office of the Illinois Attorney General. These efforts include the aforementioned monthly Consumer Protection State Agency Working Group. Consumer complaints that are originally filed with these state agencies and relate to projects and participants of Illinois Shines are often provided to the Illinois Shines Program Administrator for further investigation, and this has led to increased visibility of market issues affecting Illinois Shines consumers, as well as complaints lodged against Illinois Shines Approved Vendors and Designees.

i. Complaints Received – By Entity Type

There are two entity types for registered companies that participate in Illinois Shines: Approved Vendors and their Designees. The data in this section of the report organizes complaints received against each registered entity type that participates in the Program and includes complaints against non-Program entities.

- An *Approved Vendor* is an entity registered with the Program that serves as the counterparty to REC delivery contracts under the Program. Approved Vendors submit applications to the Program on behalf of their customers. Approved Vendors may be large national solar companies, smaller local installers, aggregators submitting applications for projects sold and built by other Program participants, or other entity types. As this entity is contractually responsible for the delivery of RECs under contracts stemming from the Program, these entities are vetted through an application process. A company must become an Illinois Shines Approved Vendor before it may become an ILSFA Approved Vendor.
- A *Designee* is an entity acting on behalf of an Approved Vendor or another Designee in the Program (and thus is generally, although not exclusively, a customer-facing marketing or sales, solicitation, or installation firm). Designees that have direct interaction with end-use

¹⁴ There is a discrepancy between past Consumer Complaints Reports and the data reflected here for the total number of complaints received in 2023, 2022, and 2021. The number of complaints has been updated to reflect that the Program Administrator received 302 (not 304) complaints during the 2023 calendar year, 257 (not 259) complaints during the 2022 calendar year, and 165 (rather than 164) complaints during the 2021 calendar year. See footnotes 18-19 for further explanation of the changes in complaint totals for 2023.

customers on behalf of an Approved Vendor or another Designee must register with the Program. There are five different types of Designees, each reflecting a role Designees can fulfill for an Approved Vendor. A Designee must select at least one role and can register for more than one role to accurately reflect the Designee’s role and relationship with the Approved Vendor. The five types of Designee roles in the Illinois Shines Portal are as follows:

- *Disclosure Form Designee* - An entity permitted to generate DG and Community Solar (“CS”) Disclosure Forms on behalf of an Approved Vendor. Only Designees designated as Disclosure Form Designees by an Approved Vendor can create and generate Disclosure Forms on behalf of that Approved Vendor;
- *Community Solar Subscriber Designee* - An entity that manages the CS subscription information for an Approved Vendor's CS projects. CS Subscriber Designees can only enter subscribers for Disclosure Forms that they have created; therefore, a CS Subscriber Designee must also be registered with the Program as a Disclosure Form Designee;
- *Marketing or Sales Designee* - An entity that acts as a marketing agent and/or customer acquisition agent on behalf of an Approved Vendor or Designee. This includes, among others, entities that engage in solicitations through any channel (in-person, telephone, etc.), as well as entities that perform online lead generation services; and
- *Installer Designee* - An entity that installs systems on behalf of an Approved Vendor or Designee;
- *Maintenance & Repair Designee*¹⁵ - An entity that performs routine maintenance, monitoring and/or repair to a system after solar installation on behalf of an Approved Vendor or Designee.

Finally, the Program Administrator sometimes receives complaints concerning non-Program entities. These complaints often concern companies marketing the Program or conducting installations for projects intended to be applied to the Program, but where the entity has not registered as an Approved Vendor or Designee with the Program.

The following is a breakdown of the 1,117 Illinois Shines complaints received in 2024 based on the Program participant:

- Complaints against Designees: 340
- Complaints against Approved Vendors: 738
- Complaints against non-Program entities: 39

¹⁵ The Program Guidebook requires that “entities that perform maintenance and repair” register as Designees of the Program. The Maintenance & Repair Designee type was created in 2024 so entities that perform maintenance and repair on systems applied to the Program have a proper classification within the Program. This new Designee type will be included in the 2025-2026 update to the Program Guidebook.

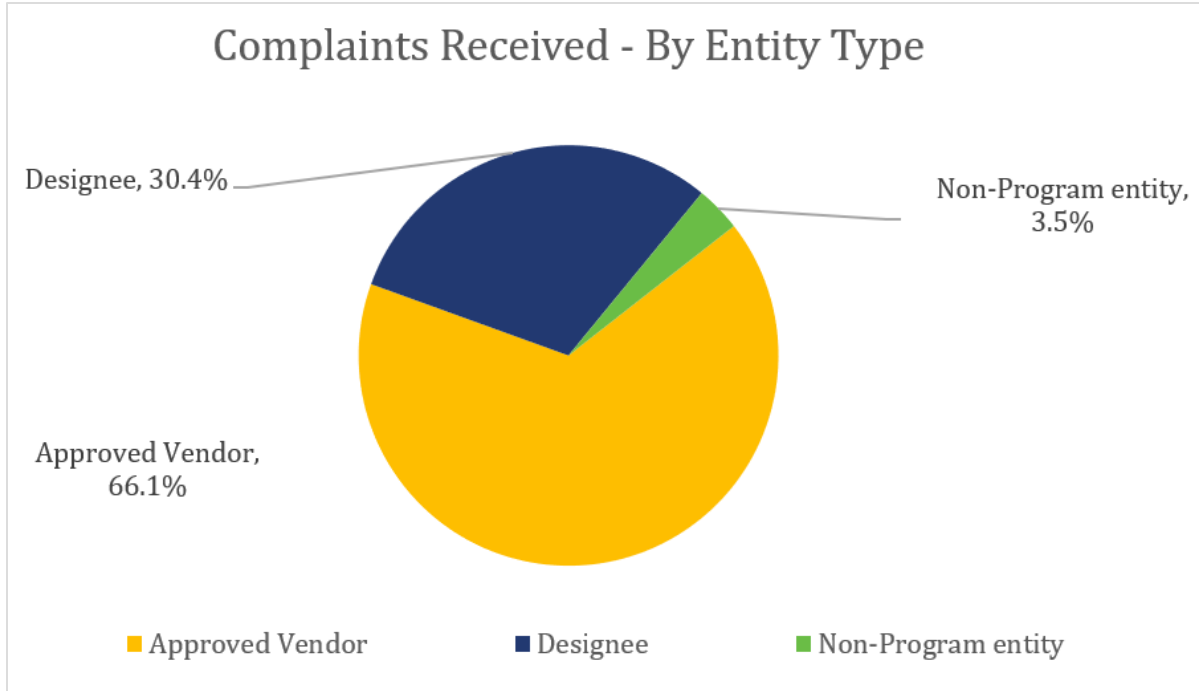


Figure 1: This chart shows the breakdown of entity type, by percentage, for all complaints received by the Illinois Shines Program Administrator in 2024.

ii. Complaints Received – By Complaint Subject

The Program Administrator tracks the primary subject of each complaint and creates new complaint subjects when the Program Administrator observes new trends in complaints. Complaints received in 2024 fell into one of 10 categories. In cases where multiple categories apply to a single complaint, the Program Administrator identified the main issue of concern to the customer as the primary complaint subject. For example, a customer filing a complaint regarding a delay in their Illinois Shines application submission may also have not received a response from their Approved Vendor or solar installer after attempting to contact the Program entity regarding these concerns. The complaint subjects and descriptions are summarized in the table below, along with a breakout of the number of complaints.

Complaint Subject	Description	Number of Complaints
Illinois Shines application issues	The customer is concerned about delays with their Illinois Shines application caused by errors their Approved Vendor made within the application, a delay in the Approved Vendor submitting the application, or the Approved Vendor's inability to move forward with a submitted application.	294
Delay/failure to pass through REC payment	The customer is concerned about a delay or failure in receiving the promised pass-through REC incentive payment from their Approved Vendor after the Approved Vendor has already received the REC incentive payment for their project.	251
Mechanical or installation issue	The customer is concerned about an issue with a physical component of their system (i.e., panel, inverter, microinverter, etc.), or reports property damage due to the installation.	223
Installation contract terms	The customer is concerned about the terms of their installation contract, financing agreement, etc.	143
Misleading marketing	The customer reports that they received misleading information related to expected savings after installing solar, expected impact of the federal tax credit, or expected amount of the Illinois Shines incentive paid to the customer by the Approved Vendor.	111
Failure to register as an Approved Vendor or Designee of the Program ¹⁶	The customer is experiencing issues stemming from an entity's failure to register with the Program.	35
Failure to respond to customer	The customer has not received an adequate response from their Approved Vendor or Designee related to a customer question or concern.	23
Miscellaneous	A complaint that does not fit any of the other categories on this list.	23
CS subscription or payment delay	The customer is experiencing issues related to their Community Solar subscription or billing.	12
Disclosure Form issues	The customer was not provided with a Disclosure Form before signing an installation or Community Solar subscription agreement.	2
Total		1,117

¹⁶ In 2024, the Program Administrator introduced a new complaint category—failure to register as an Approved Vendor or Designee—due to a high volume of complaints from customers who were marketed the Illinois Shines program by entities that were not registered as an Approved Vendor or Designee.

Figure 2: This table shows the number of complaints received by the Program Administrator for each subject category of complaint in 2024.



Figure 3: This graph shows the number of complaints received by the Program Administrator for each subject category in 2024.

iii. Complaints Received – By Entity

Below is a list of all Approved Vendors, Designees, and non-Program entities about which customers have filed a formal complaint with the Illinois Shines Program Administrator since the Program’s inception. The tables list the number of complaints filed against each entity in each year from 2019 through 2024.¹⁷ An entity may be listed in more than one section (for example, as an Approved Vendor and as a Designee) if they operated in different roles on different projects that led to complaints.

¹⁷ See footnote 14.

Company Name	2019	2020	2021	2022	2023	2024	Total
Approved Vendor	10	40	57	68	95¹⁸	738	1,008
Revolution Energy Systems, Inc					14	466	480
Sunrun Installation Services Inc.	4	5	9	30	25	63	136
Iowa Wind and Solar DBA Simpleray				1		46	47
SUNPOWER CAPITAL SERVICES, LLC		1		3	7	36	47
Carbon Solutions SREC, LLC	2	6	3		2	30	43
Freedom Forever Illinois LLC			2	3	12	19	36
NextEra Energy Capital Holdings, Inc DBA Everbright LLC					1	23	24
Tesla, Inc.		1	6	6	7	2	22
Sunnova Energy Corporation					4	14	18
Vivint Solar Developer, LLC	1	2	12	2	1		18
SRECTrade, Inc.		1	9	3		4	17
WCP Solar Services, LLC	1	11	2	2			16
Eco-Solar Solutions, LLC		2	6	8			16
Vista Energy Marketing, L.P.					5	3	8
Novel Energy Solutions LLC		6					6
Simple Solar					5	1	6
IL-Solar, Inc	1	1		1		2	5
C.A. Jones					2	3	5
Summit Solar Solutions, LLC			3	1	1		5
Certasun LLC		1		1	2		4
Blue Raven Solar, LLC						3	3
Solgen Power LLC				3			3
GRNE Solutions LLC		1		1	1		3
National Solar Service LLC					2	1	3
IGS Solar LLC					2	1	3
LGCY Power						3	3
SLDIL Portfolio LLC						2	2
Sunspot Solar LLC						2	2
Acorn Management Group					1	1	2
EFS Energy, Inc.				1	1		2

¹⁸ In the 2023 Annual Complaints Report, the total number of complaints against Approved Vendors for 2023 was listed as 98. In 2024, the Program Administrator updated this number to 95 due to the Program Administrator recategorizing two complaints to having been filed against the Designee and removing one complaint for being outside of the scope of the Program.

Company Name	2019	2020	2021	2022	2023	2024	Total
93Energy LLC						2	2
Enertech Global, LLC		1				1	2
Sun Solar Illinois, LLC						2	2
DFK Sales INC. DBA Illinois Solar Services						1	1
Tron Solar, LLC				1			1
Balance Solar LLC				1			1
Source Solar						1	1
Legacy Solar, LLC						1	1
Power Home Solar, LLC						1	1
Green Eagle Solar Holdings, LLC						1	1
Harvest Solar, LLC	1						1
Jd Pro Electric Inc			1				1
Ag Technologies, Inc.						1	1
Verde Solutions LLC		1					1
SunHeat Solar Inc.						1	1
Promethean Solar			1				1
Clean Energy Design Group, Inc.			1				1
Windsoleil Incorporated			1				1
Clearway Community Solar LLC			1				1
D&D Electric, LLC						1	1
Designee	12	35	106	186	202¹⁹	340	881
Titan Solar Power				1	14	114	129
Power Home Solar, LLC		1	17	46	20	3	87
Palmetto Solar LLC	2	4	12	21	11	12	62
Windsoleil Inc.		1	16	23	5		45
LGCY Power					7	29	36
SunPro Solar			1	4	9	20	34
Standard Eco LLC	1	8	7	8	3	1	28
Headline Solar			12	3	11	1	27
Arcadia				11	5	6	22
Bright Planet Solar, INC			1	1	2	13	17
Freedom Solar Pros					2	15	17
Moxie Solar		1	1	7	7	1	17
Modern Mill LLC			2	4	10		16
Sun Badger Solar		3	1	1	9		14
Green Home Systems						13	13

¹⁹ In the 2023 Annual Complaints Report the total number of complaints against Designees was 201. In 2024, the Program Administrator recategorized two complaints, previously filed against the Approved Vendor, to having been filed against the Designee, and removed one of the complaints per the complainant's request.

Company Name	2019	2020	2021	2022	2023	2024	Total
Solis Energy Services				3	6	4	13
Solar Ready Solutions, LLC		1	3	5	4		13
CR Solar			3	4		4	11
Excel Home Solar	1		1	4	4	1	11
Freedom Forever Illinois, LLC			1		1	9	11
Clearway Energy Group				6	4	1	11
Empire Solar Group, LLC	1	1	6	1	1		10
National Solar Service				4	3	2	9
Eco Management Systems Limited LLC		1	4	1		3	9
Ampion, Inc.				1	5	2	8
Source Solar						8	8
PSG LMTD					1	7	8
Zenernet				2	5		7
SolarUp		1		2	1	3	7
Iconic Energy	4		3				7
Noonday Solar					5	2	7
Smart Energy Solutions				4	2		6
SunAir Systems LLC		2	2	2			6
Smart Money Solar		1	1		1	2	5
Nexamp, Inc.				2	3		5
Tron Solar		1			1	2	4
Blue Sky Smart Solutions					2	2	4
Phoenix Exteriors, Inc				1	2	1	4
Revolution Energy Systems				1	1	2	4
Helio Solar Power, LLC.					1	3	4
Green Solar Technologies		1		1	2		4
Windfree Solar		1			1	2	4
Eagle Point Solar LLC		3	1				4
Summit Solar Solutions LLC					1	2	3
ProLux Energy						3	3
Route 66 Solar LLC				1	1	1	3
IGS					3		3
Encor Solar LLC			2	1			3
Rethink Electric	1		1		1		3
Kapital Electric, Inc			1	1	1		3
Ambia Energy LLC						3	3
Clean.Tech			1	1			2
Prestige Solar Solutions				2			2
Powur						2	2

Company Name	2019	2020	2021	2022	2023	2024	Total
Solar Power Midwest, Inc					1	1	2
Constellation NewEnergy, Inc.					1	1	2
Radix						2	2
Ailey Solar Electric, Inc.	1	1					2
Solar SME, Inc.			1	1			2
Sun Solar, LLC					1	1	2
Nusun Power						2	2
Sunder Energy LLC						2	2
Legacy Solar, LLC	1					1	2
Solar Grids Quad Cities LLC					1	1	2
GreenGrids LLC						2	2
Caliber Solar					2		2
National Solar					1	1	2
MC2 Energy Services, LLC				1		1	2
Campbell Electric					1		1
Supplied Energy, LLC						1	1
Sun N Us						1	1
Off Grid Energy Solutions, LLC						1	1
ION Developer LLC						1	1
OurWorldEnergy			1				1
Magitek Energy Solutions, Inc.					1		1
Conscious Energy Solutions LLC				1			1
Sunnova Energy						1	1
FreeWorld Solar					1		1
Common Energy				1			1
Porter Electric LLC						1	1
Jd Pro Electric Inc		1					1
GoodPWR LLC						1	1
Ecovole						1	1
Arrow Energy Solutions					1		1
Elegant Solar Inc.						1	1
Brilliant Solar						1	1
EnergyBillCruncher					1		1
Primitive Power						1	1
API Solar				1			1
Cross Country Construction			1				1
Tri-State Renewable Energy					1		1
GRNE					1		1
Solar One, LLC.					1		1
QC Solar LLC						1	1

Company Name	2019	2020	2021	2022	2023	2024	Total
IQ Group						1	1
Radiant Solar LLC						1	1
Earth Wind And Solar Energy, LLC					1		1
Hawk Energy Solutions						1	1
Solstice Power Technologies, Inc.						1	1
D&D Electric, LLC		1					1
Springfield Electric					1		1
Direct Solar					1		1
Stateline Solar					1		1
Direct Solar of America			1				1
Cell Electric					1		1
Ruyle Mechanical Services, Inc						1	1
Blue Raven Solar, LLC					1		1
Service 1st					1		1
ETW Energy						1	1
Sigora Solar, LLC			1				1
SunNUs Solar						1	1
BKJ Solar						1	1
Sunrise Solar LLC						1	1
IM Sustainable			1				1
Expert Energy Management LLC				1			1
Smart Sky Solar						1	1
Fosler Construction Company, INC.					1		1
Solar Energy Solutions, LLC		1					1
Oberlander Electric						1	1
Independence Renewable Energy LLC						1	1
Advanced Power USA					1		1
Midwest Solutions Inc						1	1
Corvus Pro						1	1

Company Name	2019	2020	2021	2022	2023	2024	Total
Non-Program Entity	6	2	2	3	5	39	57
Nick Blaisdell/Eleanore Electric/Alex Bauer ²⁰					1	28	29
US Renewable Energy					2	9	11
Offset Solar LLC	4						4
Energy of Illinois Inc				3			3
Total Solar Solutions	1	1					2
Suburban Solar Solutions						1	1
Brio Energy LLC	1						1
Sunsource Homes Inc			1				1
Ultimate Energy					1		1
Phenomenal Power		1					1
Woodside General Contracting/All Things Solar and Roofing					1		1
Rapid Solar						1	1
Solarize South Carolina, LLC			1				1
Grand Total	28	77	165	257	302	1,117	1,946

Figure 4: This table shows how many consumer complaints were filed against each company throughout the life of the Program. If a solar company or Program entity is not listed here, it means that the Program Administrator has never received a formal complaint against that company. Companies are organized in this table according to their role in the Program.

Complaints Received Against Approved Vendors

In 2024, the Program Administrator received 738 complaints against companies serving as a customer's Approved Vendor. For some of these complaints, the Approved Vendor also serves as the customer's installation and/or sales company. For other complaints, the Approved Vendor only serves as the company that handles the submission of the customer's application to the Program. The below chart provides a list of all complaints received in 2024 specifically against a customer's Approved Vendor.

²⁰ Nick Blaisdell and Alex Bauer claimed to work for Eleanore Electric, EPo Energy, and DR Electric. EPo Energy and DR Electric confirmed that they have never worked with Nick Blaisdell and Alex Bauer. The Program Administrator did not find proof that Nick Blaisdell and/or Alex Bauer owned or were otherwise associated with Eleanore Electric, who is not registered with the Program and is not registered to do business in Illinois.

Approved Vendor	Complaints Received Against Entity in 2024
Revolution Energy Systems, Inc	466
Sunrun Installation Services Inc.	63
Iowa Wind and Solar DBA Simpleray	46
SUNPOWER CAPITAL SERVICES, LLC	36
Carbon Solutions SREC, LLC	30
NextEra Energy Capital Holdings, Inc DBA Everbright LLC	23
Freedom Forever Illinois LLC	19
Sunnova Energy Corporation	14
SRECTrade, Inc.	4
Vista Energy Marketing, L.P.	3
C.A. Jones	3
Blue Raven Solar, LLC	3
LGCY Power	3
Sun Solar Illinois, LLC	2
Tesla, Inc.	2
Sunspot Solar LLC	2
93Energy LLC	2
IL-Solar, Inc	2
SLDIL Portfolio LLC	2
Ag Technologies, Inc.	1
Power Home Solar, LLC	1
IGS Solar LLC	1
Simple Solar	1
SunHeat Solar Inc.	1
Legacy Solar, LLC	1
Green Eagle Solar Holdings, LLC	1
Acorn Management Group	1
D&D Electric, LLC	1
Enertech Global, LLC	1
DFK Sales INC. DBA Illinois Solar Services	1
National Solar Service LLC	1
Source Solar	1
Total	738

Figure 5: This table shows the number of complaints received against Approved Vendors in 2024. If an Approved Vendor is not listed here, it means that the Program Administrator did not receive a formal complaint against that Approved Vendor (in its role as an Approved Vendor) in 2024.

Complaints Received Against Designees, by Approved Vendor

In 2024, the Program Administrator received 340 complaints against Designees. These include complaints against entities registered as Designees and Nested Designees.²¹ Below is a list of all complaints received in 2024 against Designees. These complaints are organized by the customer's Approved Vendor, where applicable.²² The complaints are organized by Approved Vendor because Approved Vendors are ultimately responsible for the conduct of Designees and others acting on their behalf in the Program. Note that Designees may register under multiple Approved Vendors. For example, an Installer Designee may perform installations for multiple Approved Vendors and is required to register separately under each of its Approved Vendors. In the below table, Designees that received complaints related to their work under more than one Approved Vendor are listed separately by Approved Vendor, based on the relevant Approved Vendor for the customer who raised the complaint.

Company Name	Complaints
Carbon Solutions SREC, LLC	
Titan Solar Power	110
SunPro Solar	18
Green Home Systems	12
Palmetto Solar LLC	10
LGCY Power	4
Solis Energy Services	4
SolarUp	3
PSG LMTD	3
Helio Solar Power, LLC.	3
Bright Planet Solar, INC	3
National Solar Service	2
CR Solar	2
Smart Money Solar	2
Windfree Solar	2
Powur	2
Ambia Energy LLC	2
BKJ Solar	1
Summit Solar Solutions LLC	1
Solar Power Midwest, Inc	1

²¹ Nested Designees are entities that have direct interaction with end-use customers related to the Program or projects intended to be applied to the Program on behalf of Designees. This may include solar installers, marketing firms, lead generators, and sales organizations. Nested Designees must clarify in their registration the Designee under which they are registering.

²² Complaints may be unassociated with an Approved Vendor. For example, Community Solar complaints may be unassociated with an Approved Vendor if the customer's subscription is not connected to a project yet. (Note that under the Consumer Protection Handbook, if a Designee markets Community Solar subscriptions that are not connected to a specific Approved Vendor, any Approved Vendor to which the prospective customer might ultimately be assigned is responsible for any marketing, enrollment, and other Designee activities that occur prior to the assignment of the customer to a specific project.) In other cases, the Program Administrator has received complaints against a Designee for marketing the Program while suspended (Designees are not affiliated with any Approved Vendor during their suspension).

Company Name	Complaints
Moxie Solar	1
ION Developer LLC	1
National Solar	1
Hawk Energy Solutions	1
Eco Management Systems Limited LLC	1
Independence Renewable Energy LLC	1
Noonday Solar	1
Sunder Energy LLC	1
Oberlander Electric	1
IQ Group	1
Ecovole	1
Route 66 Solar LLC	1
ETW Energy	1
Solar Grids Quad Cities LLC	1
Porter Electric LLC	1
Corvus Pro	1
GoodPWR LLC	1
Source Solar	1
Primitive Power	1
Sun Solar, LLC	1
ProLux Energy	1
Sunnova Energy	1
Brilliant Solar	1
Supplied Energy, LLC	1
QC Solar LLC	1
Tron Solar	1
Radiant Solar LLC	1
Revolution Energy Systems	1
Phoenix Exteriors, Inc	1
NextEra Energy Capital Holdings, Inc DBA Everbright LLC	
LGCY Power	23
Freedom Solar Pros	10
Bright Planet Solar, INC	8
Source Solar	7
Freedom Forever Illinois, LLC	6
Nusun Power	2
ProLux Energy	2
Elegant Solar Inc.	1
CR Solar	1

Company Name	Complaints
SRECTrade, Inc.	
Power Home Solar, LLC	2
Standard Eco LLC	1
Bright Planet Solar, INC	1
Eco Management Systems Limited LLC	1
Ruyle Mechanical Services, Inc	1
Excel Home Solar	1
Summit Solar Solutions LLC	1
Headline Solar	1
Palmetto Solar LLC	1
Sunnova Energy Corporation	
Blue Sky Smart Solutions	2
Radix	1
Titan Solar Power	1
Revolution Energy Systems	1
LGCY Power	1
CR Solar	1
Tron Solar	1
Palmetto Solar LLC	1
SUNPOWER CAPITAL SERVICES, LLC	
GreenGrids LLC	2
Sunrise Solar LLC	1
SunNUs Solar	1
Legacy Solar, LLC	1
Sun N Us	1
Sunrun Installation Services Inc.	
Freedom Forever Illinois, LLC	3
Bright Planet Solar, INC	1
Freedom Forever Illinois LLC	
Freedom Solar Pros	5
Summit Solar Solutions, LLC	
Titan Solar Power	2
Revolution Energy Systems, Inc	
Titan Solar Power	1
McHenry County IL S2, LLC	
Constellation NewEnergy, Inc.	1
Helios AV IL 11, LLC	
MC2 Energy Services, LLC	1
Kankakee County IL S1, LLC	
Arcadia	1

Company Name	Complaints
SRC IL REC, LLC	
Arcadia	1
SLDIL Portfolio LLC	
Ampion, Inc.	1
No Approved Vendor	
Arcadia	4
PSG LMTD	4
SunPro Solar	2
Eco Management Systems Limited LLC	1
Green Home Systems	1
Smart Sky Solar	1
LGCY Power	1
Power Home Solar, LLC	1
Midwest Solutions Inc	1
Radix	1
Sunder Energy LLC	1
Solstice Power Technologies, Inc.	1
Clearway Energy Group	1
Off Grid Energy Solutions, LLC	1
Ampion, Inc.	1
Ambia Energy LLC	1
Noonday Solar	1
Grand Total	340

Figure 6: This table shows the number of complaints received against Designees in 2024, grouped by the relevant Approved Vendor. If a Designee is not listed here, it means that the Program Administrator did not receive a formal complaint against that company in 2024.

Complaints Received Against Non-Program Entities

In 2024, the Program Administrator received 39 complaints against non-Program entities. The Program Administrator opens complaints against non-Program entities that have marketed offers that include the Illinois Shines incentive or have otherwise performed work reserved for Approved Vendors or Designees on projects that are intended to be applied to the Program. While investigating these complaints, the Program Administrator informs the non-Program entity of the Program's registration requirements and provides resources so the entity may properly register with the Program. Performing the duties of an Approved Vendor or Designee without being registered with the Program may result in pre-disciplinary and/or disciplinary action.

Non-Program Entity	Complaints Received Against Entity in 2024
Nick Blaisdell/Eleanore Electric/Alex Bauer	28
US Renewable Energy	9
Rapid Solar	1
Suburban Solar Solutions	1
Total	39

Figure 7: This table shows the number of complaints received against non-Program entities in 2024.

Distributed Generation Projects — Share of Complaints Received Compared to Share of Applications Submitted by Corresponding Approved Vendor

Approved Vendors submit varying numbers of project applications to the Program. Some submit a single application to the Program while other Approved Vendors submit hundreds or thousands of applications. Some Approved Vendors serve as REC aggregators and submit applications from many different sales and installation partners to the Program; other Approved Vendors only submit applications for systems that they also sell and install. It is helpful to compare the total number of applications submitted to the number of complaints received against an Approved Vendor, to better understand factors that may affect why the Program Administrator receives more complaints associated with some Approved Vendors than others.

The following chart presents the number of complaints associated with each Approved Vendor’s DG projects in 2024, including complaints directed against the Approved Vendor, as well as complaints against Designees that partnered with that Approved Vendor on the complainant’s project. The chart also provides the number of Part I applications that the Approved Vendor submitted in 2024, and the total number of Part I applications that the Approved Vendor submitted since the Program began accepting applications. The chart shows the percentage of total complaints and total Part I applications each entity was responsible for in 2024—essentially, a rough estimate of the Approved Vendor’s “market share” of projects and complaints.

Approved Vendor	Complaints Associated with Approved Vendor in 2024		Approved Vendor's Part I Application Data for Comparison			
	Number of Complaints	Percent of Total DG Complaints in 2024	Number of Part I Apps Submitted by Entity in 2024	Percent of Total Part I Apps Submitted in 2024 ²³	Total Part I Apps Submitted by Entity from 2019-2024	Percent of Total Part I Apps Submitted from 2019-2024 ²⁴
Revolution Energy Systems, Inc	467	42.3%	3	0.0%	1,008	1.0%
Carbon Solutions SREC, LLC	244	22.1%	663	2.7%	22,046	22.6%
NextEra Energy Capital Holdings, Inc DBA Everbright LLC	83	7.5%	4,669	18.7%	4,821	4.9%
Sunrun Installation Services Inc.	67	6.1%	756	3.0%	33,175	34.0%
Iowa Wind and Solar DBA Simplera	46	4.2%	-	0.0%	130	0.1%
SUNPOWER CAPITAL SERVICES, LLC	42	3.8%	1,128	4.5%	6,409	6.6%
Freedom Forever Illinois LLC	24	2.2%	342	1.4%	1,595	1.6%
Sunnova Energy Corporation	23	2.1%	1,947	7.8%	2,708	2.8%
SRECTrade, Inc.	14	1.3%	-	0.0%	6,065	6.2%
Blue Raven Solar, LLC	3	0.3%	-	0.0%	-	0.0%
LGCY Power	3	0.3%	683	2.7%	1,745	1.8%

²³ 24,928 Part I applications were submitted in 2024.

²⁴ 97,512 Part I applications were submitted from 2019 through 2024.

Approved Vendor	Complaints Associated with Approved Vendor in 2024		Approved Vendor's Part I Application Data for Comparison			
	Number of Complaints	Percent of Total DG Complaints in 2024	Number of Part I Apps Submitted by Entity in 2024	Percent of Total Part I Apps Submitted in 2024 ²³	Total Part I Apps Submitted by Entity from 2019-2024	Percent of Total Part I Apps Submitted from 2019-2024 ²⁴
C.A. Jones	3	0.3%	12	0.0%	413	0.4%
Vista Energy Marketing, L.P.	3	0.3%	1	0.0%	2	0.0%
SLDIL Portfolio LLC	3	0.3%	11	0.0%	177	0.2%
Summit Solar Solutions, LLC	2	0.2%	222	0.9%	1,251	1.3%
Sun Solar Illinois, LLC	2	0.2%	61	0.2%	848	0.9%
Sunspot Solar LLC	2	0.2%	28	0.1%	166	0.2%
Tesla, Inc.	2	0.2%	-	0.0%	758	0.8%
IL-Solar, Inc	2	0.2%	234	0.9%	234	0.2%
93Energy LLC	2	0.2%	17	0.1%	278	0.3%
SunHeat Solar Inc.	1	0.1%	-	0.0%	-	0.0%
Ag Technologies, Inc.	1	0.1%	-	0.0%	41	0.0%
DFK Sales INC. DBA Illinois Solar Services	1	0.1%	19	0.1%	392	0.4%
Simple Solar	1	0.1%	-	0.0%	-	0.0%
Legacy Solar, LLC	1	0.1%	196	0.8%	506	0.5%
Source Solar	1	0.1%	81	0.3%	240	0.2%
Enertech Global, LLC	1	0.1%	-	0.0%	-	0.0%
IGS Solar LLC	1	0.1%	1	0.0%	1	0.0%
Power Home Solar, LLC	1	0.1%	53	0.2%	129	0.1%
Acorn Management Group	1	0.1%	-	0.0%	-	0.0%
Helios AV IL 11, LLC	1	0.1%	-	0.0%	31	0.0%

Approved Vendor	Complaints Associated with Approved Vendor in 2024		Approved Vendor’s Part I Application Data for Comparison			
	Number of Complaints	Percent of Total DG Complaints in 2024	Number of Part I Apps Submitted by Entity in 2024	Percent of Total Part I Apps Submitted in 2024 ²³	Total Part I Apps Submitted by Entity from 2019-2024	Percent of Total Part I Apps Submitted from 2019-2024 ²⁴
D&D Electric, LLC	1	0.1%	8	0.0%	427	0.4%
National Solar Service LLC	1	0.1%	-	0.0%	-	0.0%

Figure 8: This chart compares (a) the number and ‘market share’ of complaints associated with a given Approved Vendor’s DG projects to (b) the number and ‘market share’ of Part I DG applications that the Approved Vendor submitted in 2024, and (c) the number and ‘market share’ of Part I DG applications that the Approved Vendor submitted since the beginning of the Program. The chart does not list Approved Vendors with no complaints, and as a result the percentages for Part I applications do not total 100%. The chart does not include complaints associated with no Approved Vendor or a non-Program entity, so the “Percent of Total Complaints” column does not total 100%. The chart is limited to complaints associated specifically with DG applications (and does not include CS) because the number of projects for which a DG Part I application has been submitted more closely correlates with the number of customers / potential complainants.

iv. Complaints Received – By Complaint Status

Currently, the Illinois Shines Program Administrator has four status categories for complaints. These status categories are:

- **Under Investigation** – This status indicates a complaint that is actively being investigated by the Program Administrator as of the date of release of this Report. A complaint remains in this status until (a) it is marked as is Resolved, or (b) the Program Administrator determines that it is unable to reach a resolution between the parties, or (c) the complainant becomes unresponsive to the Program Administrator.
- **Resolved** – This status indicates a complaint where the Program Administrator was able to help the customer reach a resolution, where the customer is satisfied with the company’s explanation for the issue, the Program Administrator is satisfied with the explanation given by the company, or where the Program Administrator is able to help the customer reach a resolution when the company is unable or unwilling to assist with a resolution.²⁵
- **Closed** – Closed complaints can be divided into two categories: “Closed” and “Closed – Customer Nonresponsive.”

²⁵ The definition of a Resolved complaint was updated at the beginning of 2025 to more accurately reflect the Program Administrator’s processes.

- **Closed** – This status indicates a complaint where, after multiple attempts by the Program Administrator to help resolve the customer's concerns, the company did not resolve the customer's concerns, or the Program Administrator and the customer were unable to receive a satisfactory explanation from the company regarding the customer's concerns. If the company violated Program requirements, the Program Administrator may consider disciplinary action. Even though the Program Administrator's outreach to the company did not address the customer's concerns, the Program Administrator may be able to provide additional assistance, such as providing resources for stranded customers. The complaint can be reopened if additional information becomes available.
- **Closed – Customer Nonresponsive** – This status indicates a complaint where the customer did not provide all the information necessary for the Program Administrator to investigate the complaint, or where the customer did not respond to the Program Administrator's attempts to address their complaint. If the Program Administrator does not receive adequate documentation from the customer, the Program Administrator is unable to adequately work to resolve the complaint with the entity the complaint was filed against.
- **Reopened** – This status indicates a renewed complaint that had previously been marked as either "Resolved" or "Closed" by the Program Administrator. Reopened complaints are complaints where the customer contacts the Program Administrator stating that the same issue in their original complaint has recurred, or that a new similar issue has arisen.

The Program Administrator performs a full investigation of the complaint while the complaint is "Under Investigation." This process includes working with the complainant to obtain any relevant documentation and information related to the complaint to determine the relevant facts. Complaints are marked as either "Resolved" or "Closed" only if the investigation of the complaint has reached an end point.

If during (or at the conclusion of) an investigation, the Program Administrator has reason to believe a Program violation occurred, the Program Administrator will perform informal outreach or issue a Notice of Potential Violation to the relevant entity. After receiving a response to the informal outreach or Notice of Potential Violation, the Program Administrator may implement consequences for violations of Program requirements as laid out in the Consumer Protection Handbook's Program Violation Response Matrix ("Matrix").²⁶ Based on the facts of the case and by referencing the Matrix, the Program Administrator will determine whether non-disciplinary action, such as a corrective action and/or a formal warning, is appropriate, or if more serious disciplinary action such as suspension is warranted. Additionally, if a company is not responsive to the Program Administrator during the investigation of the customer's complaint, the Program Administrator may restrict the company's access to the Illinois Shines Portal until they become responsive to the Program Administrator's requests for information. Restricted Portal access suspends the ability for the company to submit customer Disclosure Forms or project applications, as well as other Portal capabilities, and may be paired with non-disciplinary or disciplinary actions.

²⁶ The Program Violation Matrix is available in the [Consumer Protection Handbook](#), Section X.D.

The Program Administrator strives to resolve each complaint submitted to the satisfaction of customers. However, some complaints received by the Program Administrator do not constitute violations of specific Program requirements. While the Agency strives to evolve Program requirements over time to address and prevent negative customer experiences more fully, some allegations of misconduct are considered outside of the Program's scope. For example, in the initial Consumer Protection Handbook issued July 14, 2022—which Approved Vendors and Designees were required to comply with beginning August 28, 2022—the Agency added the explicit requirement and retained it in the subsequent version, that all Approved Vendors and Designees must “ensure that their work does not create safety hazards or property damage from poor workmanship” and must “comply with all contractual obligations to customers.”²⁷ Nonetheless, sometimes complainants raise issues that are outside the Program’s scope, such as complaints about solar projects that are not intended to be applied to the Program (and there were no marketing promises made related to the Program).

When the Program Administrator receives a complaint from a customer that is considered outside the scope of the Program or that implicates ambiguous contractual issues, the Program Administrator may still seek to assist the customer in any way it can within the confines and scope of the Program. This response includes contacting the customer’s Approved Vendor and/or Designee to facilitate a discussion between the two parties and obtaining a response from the Approved Vendor and/or Designee regarding the issue. The Program Administrator may also give the customer instructions on how to submit a complaint to the Commission and/or the Office of the Illinois Attorney General, or refer the complaint to another agency, depending on the facts involved.

The following shows the breakdown of total complaints received by the Program Administrator from January 1, 2024, to December 31, 2024, by complaint status, as of January 10, 2025, the date that the data for this report was compiled:²⁸

Complaint Status	Number of Complaints
Under Investigation	572
Closed	279
Resolved	224
Closed – Customer Nonresponsive	33
Reopened	9
Total	1,117

Figure 9: This table shows the status of each complaint received in 2024 as of the date of this Report.

²⁷ Section I.A of the [Consumer Protection Handbook](#).

²⁸ All complaints received in 2020-2022 are either Resolved or Closed; no complaints received before 2023 remain Under Investigation.

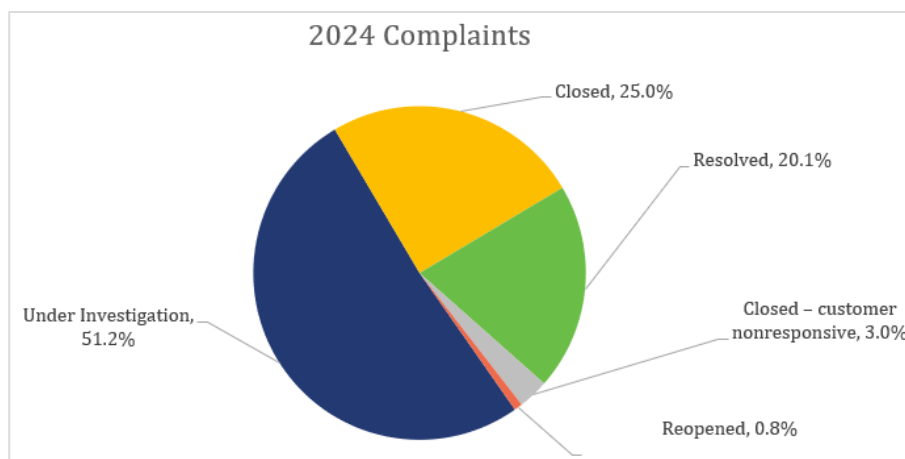


Figure 10: This chart shows the percentage of complaints in each complaint status for complaints received in 2024.

b. Illinois Shines Consumer Complaint Data Analysis

i. Complaints Received Against Out of Business Entities

In 2024, the Program received 1,117 complaints, marking a 270% increase compared to 2023. This surge was primarily driven by 691 complainants (62% of total complaints) whose Approved Vendor or Designee had limited or ceased operations.

Approved Vendors and Designees who were previously in good standing with the Program and subsequently reduced their operations or have gone out of business have significantly impacted complaint volumes in 2024. This section of the Report refers to these companies as "out of business" entities. "Out of business" entities that received complaints in 2024 include Revolution Energy Systems, Inc., Titan Solar Power, Iowa Wind and Solar DBA Simpleray, ADT Solar, National Solar Service, Noonday Solar, Simple Solar, SUNPOWER CAPITAL SERVICES, LLC, Moxie Solar, and Power Home Solar, LLC DBA Pink Energy.

To illustrate the overall impact of "out of business" entities on complaints in 2024, this section of the Report compares "out of business" entities with "all other" entities that received complaints in 2024. For the purposes of Figures 11 and 12, the following descriptions constitute the "all other" entities category:

- Approved Vendors and Designees in good standing;
- Approved Vendors and Designees who withdrew from the Program in good standing;
- Approved Vendors and Designees who have been suspended from the Program for reasons not related to their reduced operations or going out of business; and
- Entities who are not registered with the Illinois Shines program.

Complaint Subject	Number of complaints against “out of business” entities	Number of complaints against “all other” entities	Total Complaints in 2024
Illinois Shines application issues	253	41	294
Delay/failure to pass through REC payment	225	26	251
Mechanical or installation issue	105	118	223
Installation contract terms	69	74	143
Misleading marketing	23	88	111
Failure to register as an Approved Vendor or Designee of the Program	0	35	35
Failure to respond to customer	9	14	23
Miscellaneous	7	16	23
CS subscription or payment delay	0	12	12
Disclosure Form issues	0	2	2
Total	691	426	1,117

Figure 11: This chart shows the number of complaints received by the Program Administrator for each category of complaint in 2024 broken down by “out of business” entities and “all other” entities.

Figure 11 shows that “out of business” entities accounted for 62% of the total complaints received in 2024. “Out of business” entities represent a significant portion of complaints received for the three most frequent complaint category in 2024: Illinois Shines application issues (86%), delay/failure to pass through REC payment (90%), and mechanical or installation issues (47%). A significant number of complaints about installation contract terms (48%) were also due to “out of business” entities.

Figure 11 shows that a high number of complaints against “all other” entities stemmed from mechanical or installation issues (118 complaints), misleading marketing (88 complaints), and issues with installation contract terms (74 complaints).

Complaint Status	Complaints against “out of business” entities	Complaints against “all other” entities	Number of Complaints
Under Investigation	429	143	572
Closed	195	84	279
Resolved	61	163	224
Closed – Customer Nonresponsive	4	29	33
Reopened	5	4	9
Total	694	423	1,117

Figure 12: This table shows the status of each complaint received in 2024 broken down by “out of business” entities and “all other” entities.

Figure 12 shows that the majority of complaints that remain categorized as “Under Investigation” (75% of total) at the end of 2024 were lodged against “out of business” entities. Complaints are typically marked as “Closed” when, after multiple attempts by the Program Administrator to help resolve the customer’s concerns, an Approved Vendor or Designee does not resolve the customer’s concerns, does not provide a satisfactory explanation regarding the customer’s concerns, and is not responsive to deadlines set by the Program Administrator. The Program Administrator, in collaboration with the IPA, decided to keep certain complaints against “out of business” entities open as “Under Investigation,” for example, as it continued discussions with those out of business entities on potential avenues to resolve those complaints (e.g., through a voluntary escrow process).

One hundred ninety-five of the 260 (75%) complaints against “out of business” entities that were closed out in 2024 were marked as “Closed.” When the Program Administrator marked complaints against “out of business” entities as “Closed,” it provided these customers with stranded customer resources²⁹ so they could work to connect with a new Approved Vendor who could move forward with their Part I applications or so that they could connect with an Approved Vendor or Designee to assist with system issues. This group of customers represents only a portion of customers who received stranded customer assistance in 2024, as is discussed in the following section of the Report. The Program Administrator kept some complaints from Revolution customers open, as the Program Administrator worked with Revolution to potentially avail itself of a voluntary escrow process that could result in the resolution of some of those complaints.

In 2024, the Program Administrator took a new, proactive step by notifying customers when the Program Administrator became aware that their Approved Vendor or Designee went out of business. The Program Administrator provided assistance to these customers, upon request, by opening complaints against the “out of business” entities, providing information on upcoming consumer protection initiatives, providing them with stranded customer resources, and offering to forward their complaints to the Illinois Attorney General’s Office, among other things. This outreach strategy likely contributed to the overall increase in complaints received in 2024, as the Illinois Shines

²⁹ Stranded Customer resources may be found at <https://illinoisshines.com/stranded-customer-resources/>.

consumer protection team initiated contact with a high volume of customers who may have been affected by an Approved Vendor or Designee that went out of business or reduced operations.

ii. Illinois Shines Consumer Stranded Customer Data Analysis

Launched in late 2023, the Program began processing and tracking stranded customers in 2024. Throughout 2024, the Illinois Shines program handled 546³⁰ stranded customer projects. These customers are DG participants whose Approved Vendor and/or Designee is unable or unwilling to: (a) complete the solar project installation, (b) submit or complete a project application to the Illinois Shines program, (c) pass-through any promised incentive payments to customers with completed applications, or (d) serve as the Approved Vendor for the duration of the REC contract. These situations most commonly occur when the Approved Vendor and/or Designee goes out of business, limits operations, and/or is suspended from the Program and is prohibited from advancing existing applications due to consumer protection concerns.

If customers become stranded for any of the four reasons listed above, they may register as a stranded customer with the Program Administrator to continue receiving assistance from the Program Administrator. Customers can register by either contacting the Program Administrator directly via email or phone or by completing the Stranded Customer Support Request Form.³¹ A complaint does not need to be opened to be considered a stranded customer.

After receiving a Stranded Customer Support Request Form, or a request to be tracked as a stranded customer via email or phone communication, the Program Administrator provides stranded customers with resources to help them transition out of their stranded status. These resources include a shortlist of Approved Vendors and Designees who have expressed interest in assisting stranded customers and have been vetted based on established eligibility criteria.³² Additionally, customers receive a list of all Approved Vendors and Designees that notes which entities are currently suspended or are no longer active in the Program, should they choose to engage with an entity outside of the vetted shortlist. The customer is also provided with information on obtaining legal counsel if they believe the stranding entity has violated the terms of their contract.³³

After a stranded customer identifies an Approved Vendor or Designee who could potentially address their needs, if requested, the Program Administrator facilitates communication between the customer, the new entity, and the stranding entity to ensure the exchange of any necessary information related to the customer's application, and ushers them through the application assignment process (as necessary).

³⁰ Some customers may have multiple projects under the same name. Each system is represented individually, as each is linked to a distinct application ID.

³¹ The Stranded Customer Support Request Form is located at the bottom of the Help for Stranded Customers page available at <https://illinoisshines.com/stranded-customer-resources/>.

³² The Program Administrator issues weekly announcements to all participating entities, which include language inviting entities interested in serving stranded customers to apply to be included on the shortlist. The original announcement outlines the opportunity to support stranded customers, eligibility requirements, and anticipated responsibilities, and is available here: https://illinoisshines.com/wp-content/uploads/2023/06/Stranded-Customers_Final-Announcement_21June2023.pdf.

³³ Customers may see the Attorney General's list of legal assistance referrals or contact the Illinois State Bar Association if they wish to consult an attorney.

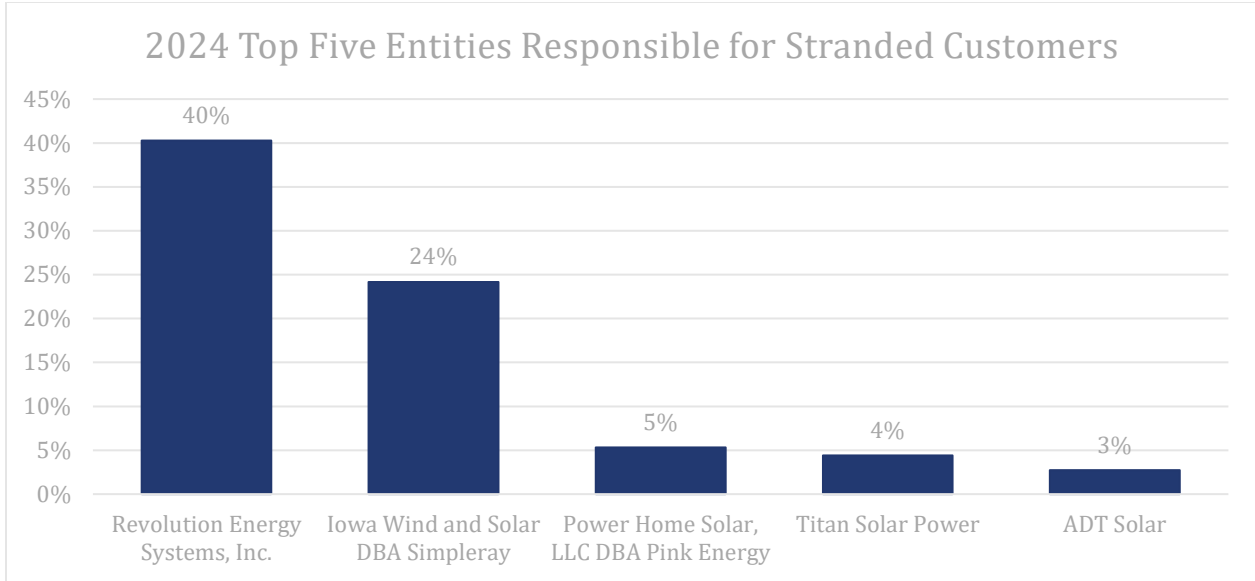


Figure 13: This chart illustrates the top five Program entities in 2024 who were responsible for customers who registered as stranded with the Program Administrator.

Figure 13 shows the five companies responsible for the most customers who registered with the Program as stranded (either via the Stranded Customer Support Request Form, email, or phone). These five companies accounted for 76% of the total stranded customers registered with the Program Administrator in 2024, with Revolution Energy Systems, Inc. and Iowa Wind and Solar DBA Simpleray far outpacing any other companies that left customers stranded.

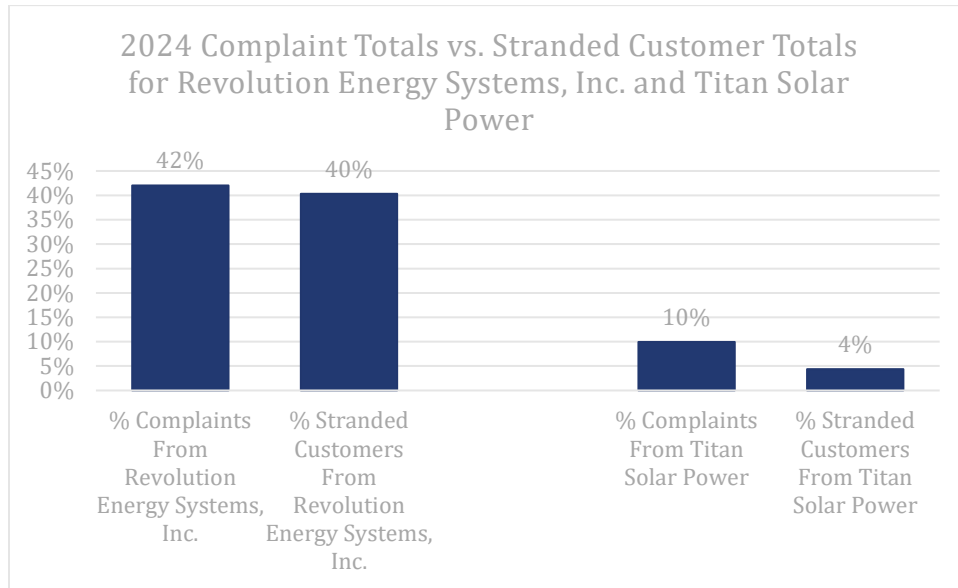


Figure 14: This chart compares the total percentage of complaints opened for Revolution Energy Systems, Inc. and Titan Solar Power customers, respectively, relative to the grand total of all complaints in 2024, as well as the total percentage of stranded customers for Revolution Energy Systems, Inc. and Titan Solar Power customers, respectively, relative to all customers who registered with the Program as stranded in 2024.

Figure 14 compares the percentage of total complaints and the percentage of customers that were stranded by Revolution and Titan in 2024. Revolution, an Approved Vendor, and Titan, a Designee,

performed different roles in their customers' projects. The following analysis serves to outline the issues about which Revolution and Titan customers filed complaints with the Program Administrator and how those issues impacted whether the complainants also registered for stranded customer assistance.

Revolution Energy Systems, Inc. was suspended on February 2, 2024, due to multiple Program violations, including extensive mishandling of REC payments, failure to comply with contractual obligations, misrepresentations to customers, and unfair business practices. Titan Solar Power was suspended on July 8, 2024, for failing to fulfill its contractual obligations to customers following the closure of its business operations. This suspension followed a Notice of Potential Violation issued on June 24, 2024, citing nonresponsiveness. Not all entities that go out of business, are suspended, and/or have numerous complaints will necessarily result in a significant number of stranded customers.

In 2024, Revolution Energy Systems, Inc. and Titan Solar Power received the highest number of complaints, accounting for 42% and 10% of total complaints, respectively, as noted in Figure 14. However, the impact of these complaints on stranded customers varied significantly between the two entities, as explained further below.

Revolution Energy Systems, Inc., as an Approved Vendor, was responsible for submitting customer project applications to the Program and addressing any issues related to those applications. Further, its business model was to pass through a portion of the REC incentive to its customers after their projects were Part II verified and invoiced to the utility. Revolution Energy Systems, Inc. was suspended in part due to its failure to fulfill this contractual obligation of passing through promised incentive payments. Subsequently, the Program Administrator froze all Revolution Energy Systems, Inc. applications that had not yet been Part II verified to prevent harm to additional customers, ensuring that Revolution Energy Systems, Inc. could no longer receive REC payments from the utilities for additional projects.

As a result of Revolution Energy Systems, Inc.'s actions and the Program Administrator's proactive decision to freeze applications, hundreds of customers were stranded. These customers either had pending applications at the time processing was frozen, or their projects had received final approval but the Program Administrator halted invoice generation so Revolution did not receive the related REC incentives. Sixty-five percent of complaints against Revolution Energy Systems, Inc. came from customers whose applications had not yet been Part II verified. These customers required assistance to connect with a new Approved Vendor if their applications were not yet Part I verified, or were awaiting development of a process to facilitate reassignment to a new Approved Vendor if their applications were already ICC approved (but not Part II verified).³⁴ Therefore, it is unsurprising that so many of these complainants subsequently registered as stranded customers.³⁵ A similar pattern

³⁴ The application process steps are explained in the "Going Solar with Illinois Shines" flyer available here at https://illinoisshines.com/wp-content/uploads/2023/05/2023_Guide-to-Going-Solar_ILS_05_31.pdf.

³⁵ Throughout 2024, the Program Administrator and Agency discussed with Revolution Energy Systems, Inc. (or "Revolution") a proposal from Revolution that it would engage in a voluntary escrow process. This process would allow Revolution customers with submitted Part II applications both to have the opportunity to have those applications verified by the Program Administrator and to receive their promised pass-through incentive payments via a third-party escrow agent with certain safeguards in place. The Program Administrator is hopeful this process will come to fruition in 2025 and will communicate details of any such escrow process to affected customers before implementation. If successful, this voluntary escrow process has the potential to resolve many of the outstanding complaints against Revolution.

was observed with Iowa Wind and Solar DBA Simpleray, though its impact was less significant due to a lower volume of pending applications.

In contrast, Titan Solar Power, a Designee installer, had a different role in the Program. As a Designee, Titan Solar Power was not responsible for managing applications through the Program or handling promised incentive payments to customers. Titan Solar Power's primary function was the installation, maintenance, and repair of solar energy systems for its customers. Titan Solar Power was suspended due to its failure to fulfill contractual obligations and its nonresponsiveness to both its customers and the Program Administrator.

In response to Titan Solar Power's closure, the Program Administrator proactively reached out to all Titan customers with applications submitted to the Program, informing them of Titan's suspension and business closure. The email detailed the process to file complaints with the Program Administrator (if applicable) and included stranded customer resources so customers could find new companies in good standing with the Program that could assist with system installation, maintenance, or production issues. The two most prevalent complaint categories against Titan Solar Power (comprising 67% of all complaints received) were related to installation contract terms and Illinois Shines application issues. .

As shown in Figures 13 and 14 above, Revolution Energy Systems, Inc. was responsible for stranding more customers than any other entity in 2024, accounting for 40% of all stranded customers. Customers of Revolution Energy Systems, Inc., whose applications were frozen prior to Part II verification registered as stranded customers to track their progress and receive assistance in working with a new Approved Vendor or to receive updates on the consumer protection initiatives. In contrast, Titan Solar Power accounted for 4% of the total stranded customers in 2024. Approximately 58% of stranded customers from Titan Solar Power experienced issues with solar systems that were either installed but defective (e.g., broken), installed but not energized, installed but underproducing, or not installed at all, and requested assistance from the Program to find a new company for support.

As Titan Solar Power was an installer Designee, and was not an Approved Vendor, customer concerns related to system construction and uncertainty regarding future warranty coverage and maintenance. These concerns were likely addressed through the stranded customer resources proactively provided by the Program early on, which resolved the concerns without further assistance, thereby preventing the need for these customers to register as stranded with the Program Administrator.

Conversely, Revolution Energy Systems, Inc.'s customers—particularly those requiring help to move their applications forward and whose applications were not Part II verified—raised more complex issues to resolve related to application processing or payment failures because of the role of Approved Vendors in the Program. These customers required continued assistance from the Program Administrator to find a new Approved Vendor to take over the application and/or to receive updates from the Program Administrator regarding the forthcoming implementation of the consumer protection initiatives.

iii. Complaints Received Compared to Total Applications Received

During 2024, the Program Administrator received 1,117 complaints, which is a 270% increase from the number of complaints received in 2023. With a growing list of Program customers and no time

limitations within which a customer is required to file a complaint, the total number of potential complainants has continued to increase.

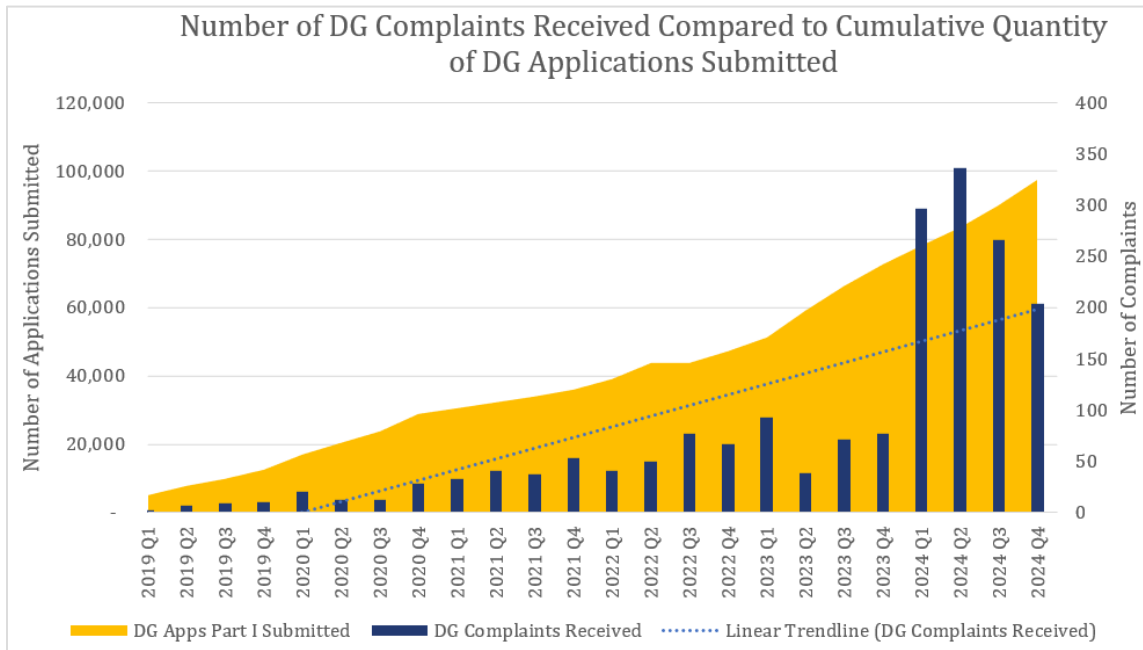


Figure 15: This graph shows the cumulative total number of Part I DG applications submitted to the Program Administrator and the number of DG customer complaints received on a quarterly basis since the Program opened in 2019 through the end of 2024. This graph demonstrates how the total base of Illinois consumers with DG applications and the number of DG projects in Illinois Shines have grown over time.

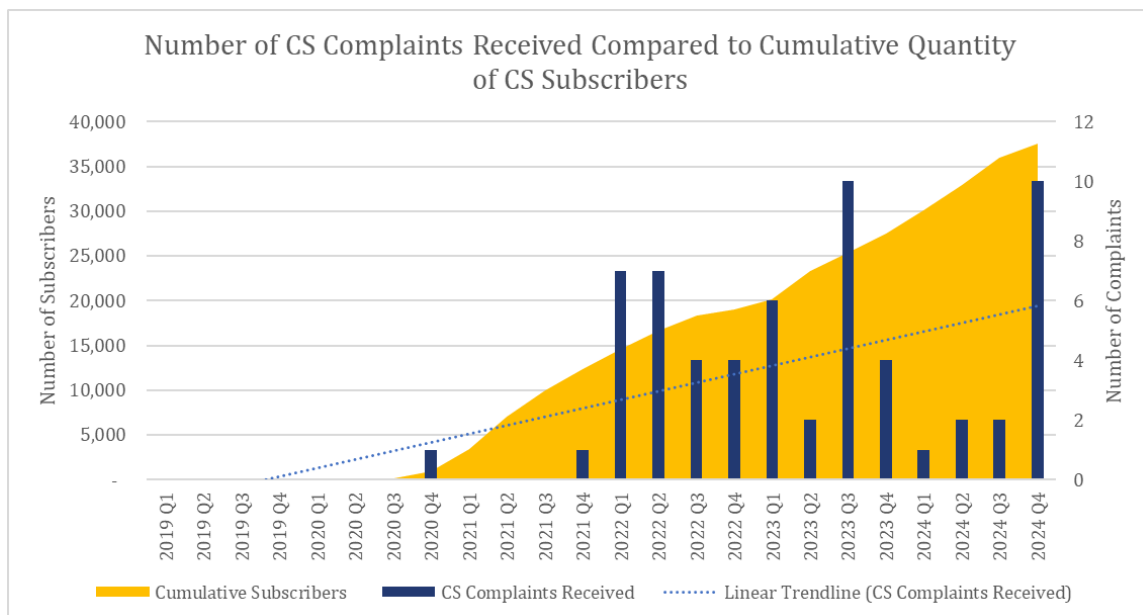


Figure 16: This graph shows the cumulative total number of CS subscribers and the number of CS complaints received quarterly since the Program opened in 2019 through the end of 2024.

Figure 15 shows that the number of DG complaints received each quarter followed a generally increasing trend until a drastic increase in complaints were received in 2024. This increase was primarily driven by complaints against “out of business” entities, which received 694 complaints in

2024. Figure 16 illustrates that the number of CS complaints the Program received each quarter has a weak correlation with the increasing number of cumulative CS subscribers; as shown by the overall decrease in the number of CS complaints received in 2024 compared to 2022 and 2023.

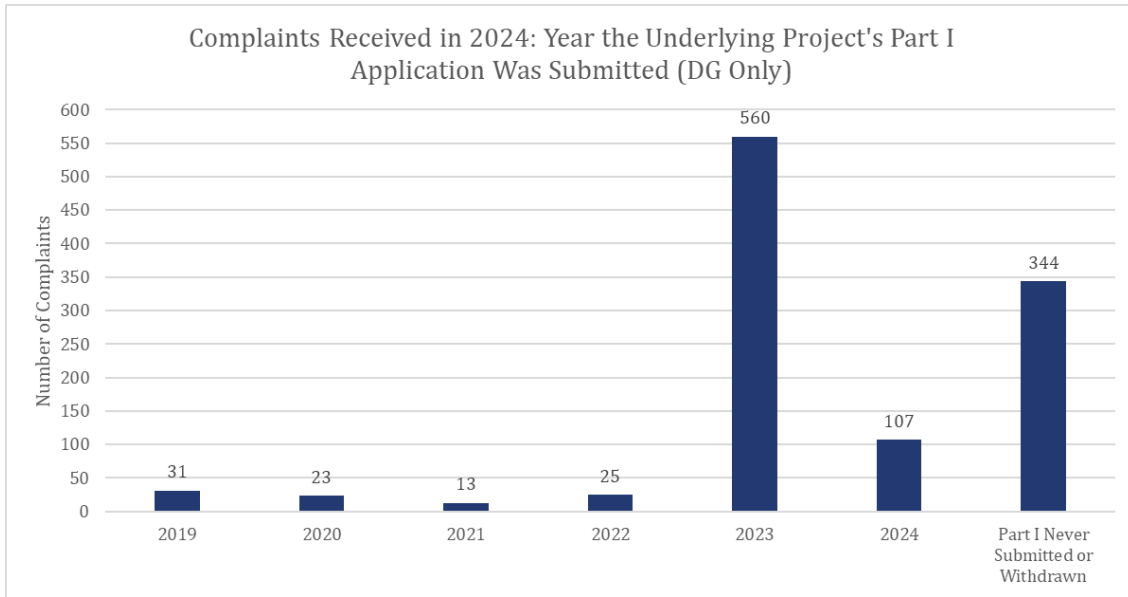


Figure 17: This graph shows when the Part I application for the underlying DG project was submitted to the Program for complaints submitted in 2024. Bars “2019” through “2024” indicate complaints from customers with an application submitted to the Program. “Part I Never Submitted or Withdrawn” represents customers who do not yet have a Part I application submitted to the Program, including customers who decided not to participate in the Program or canceled their solar contract. Complaints can be submitted to the Program Administrator at any point, including before an associated application is submitted to the Program. This chart does not include CS complaints received by the Program Administrator in 2024, as CS subscribers do not have individual applications.

Figure 17 shows that of the 1,103 complaints related to DG projects received in 2024, 652 were submitted by customers who had a Part I application submitted in one of the previous years. Complaints may be received long after the relevant Part I application has been submitted and can be related, for example, to issues with the system that appear several months to several years after the installation, or to issues with receiving a promised incentive payment from the customer’s Approved Vendor.

Figure 17 shows that more than half (560) of the 1,103 DG project complaints received in 2024 relate to project applications submitted in 2023. Of the 1,103 DG customers that submitted complaints in 2024, 344 did not yet have a submitted Part I application or their Part I application was withdrawn (31%). Complaints that are received before a customer’s Part I application is submitted can relate to many issues, including installation issues, responsiveness issues, a delay in a customer’s Part I application submission, or issues relating to an Approved Vendor or Designee going out of business or leaving the Illinois market.

The 344 DG complaints received in 2024 from customers who do not have a submitted Part I application demonstrates that while the total number of Part I applications received may be used as a proxy for total customer base, it does not represent the full universe of potential complainants.

iv. Program Entities with Multiple Complaints, Few Complaints or No Complaints

The majority of companies participating in the Program as DG and/or CS Approved Vendors or Designees were not the subjects of formal complaints in 2024.

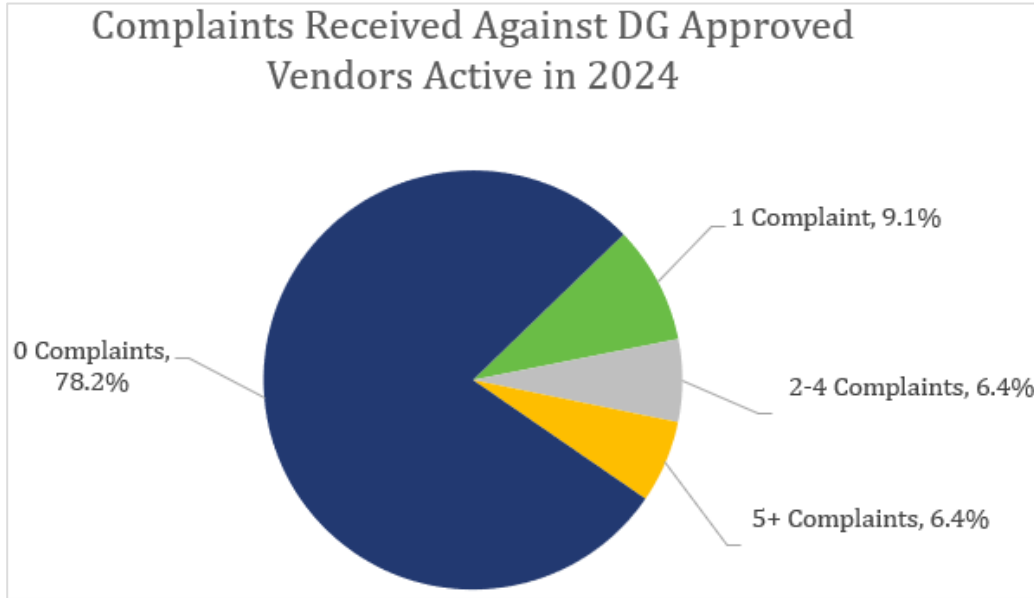


Figure 18: This chart shows all active DG Approved Vendors, and the number of complaints filed against each Approved Vendor in 2024. An active DG Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one DG Disclosure Form in 2024. There were 110 active DG Approved Vendors in 2024.

Figure 18 shows that 78.2% of DG Approved Vendors active in 2024 did not have any complaints filed against them that year. An active DG Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one DG Disclosure Form in 2024. Of Approved Vendors active in 2024, 9.1% had a single complaint filed against them, which does not necessarily indicate a widespread issue within the company. Only 12.8% of Approved Vendors active in 2024 had more than one complaint filed against them. The overall number of active DG Approved Vendors increased from 103 in 2023 to 110 in 2024, while the percentage of active DG Approved Vendors that received five or more complaints decreased from 9.7% in 2023 to 6.4% in 2024.

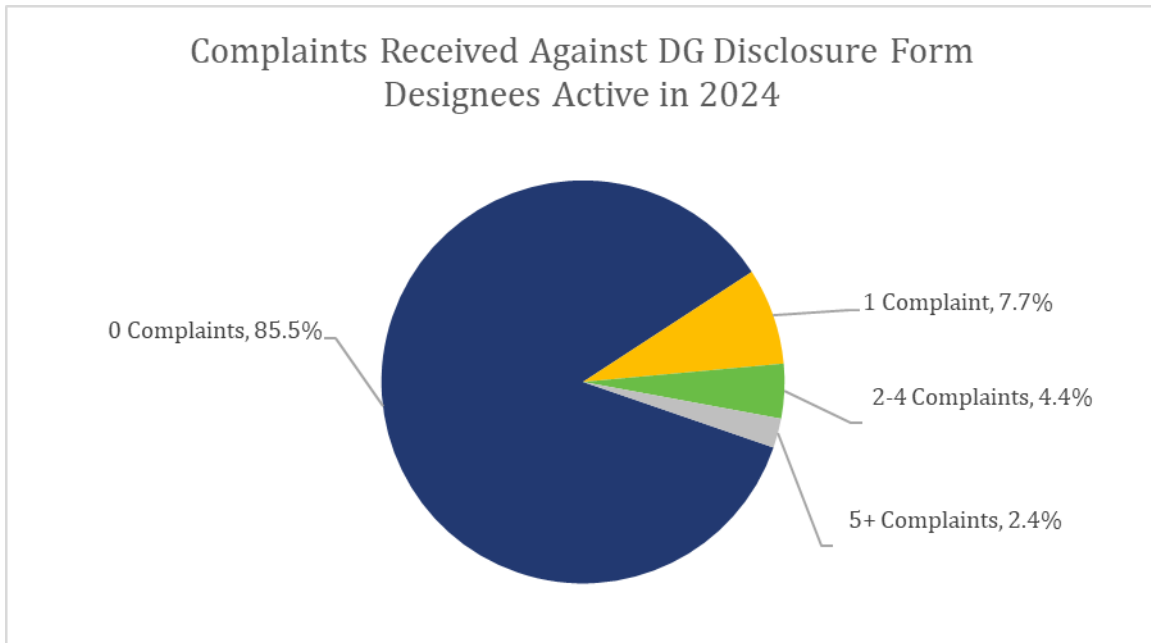


Figure 19: This chart shows all active Disclosure Form Designees, and the number of complaints received against each Disclosure Form Designee in 2024. An active Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one DG Disclosure Form in 2024. There were 297 active Disclosure Form Designees in 2024.

Figure 19 shows that 85.5% of DG Disclosure Form Designees active in 2024 did not have a formal complaint filed against them. An active DG Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one DG Disclosure Form in 2024. Of the Disclosure Form Designees active in 2024, 7.7% had a single complaint filed against them, which does not necessarily indicate a widespread issue within the company. Only 2.4% of DG Disclosure Form Designees active in 2024 received five or more complaints.

With regard to CS Approved Vendors, of the 41 active CS Approved Vendors in 2024, the Program Administrator received two complaints against a single active CS Approved Vendor in 2024. An active CS Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one CS Disclosure Form in 2024. All other CS complaints in 2024 were lodged against CS Designees, who tend to be responsible for most consumer interactions.

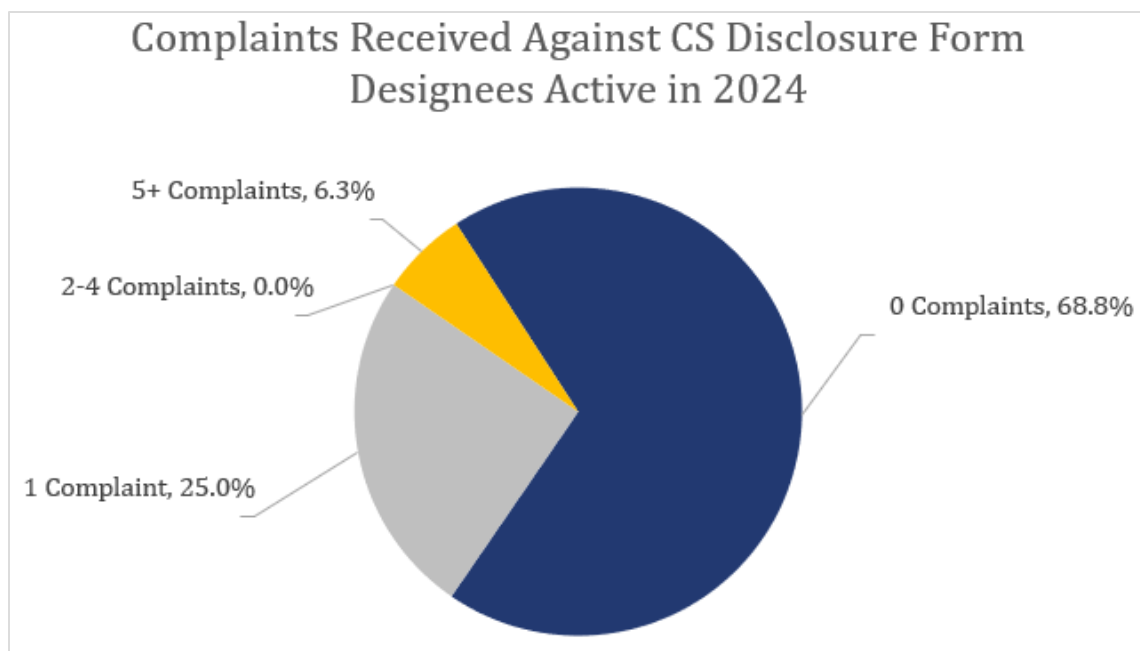


Figure 20: This chart shows all active CS Disclosure Form Designees, and the number of complaints received against each CS Disclosure Form Designee in 2024. An active CS Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one CS Disclosure Form in 2024. There were 16 active CS Disclosure Form Designees in 2024.

Figure 20 shows that 68.8% of CS Disclosure Form Designees active in 2024 did not have a formal complaint filed against them. An active CS Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one CS Disclosure Form in 2024. Twenty-five percent of CS Designees active in 2024 only had one complaint filed against them, which does not necessarily indicate a widespread issue within the company. One entity (representing 6.3% of CS Designees active in 2024) had five or more complaints filed against it. Figure 20 shows that a higher *percentage* of CS Designees had one or more complaint as compared to DG Designees (31.3% as compared to 14.5%). One contributing factor may be the lower number of active Disclosure Form Designees for CS compared to DG. There were only 16 active Disclosure Form Designees for CS (about one for every 2,389 subscribers), while there were 297 for DG (about one for every 267 customers) in 2024. Since there are fewer CS Disclosure Form Designees, there are a higher number of subscribers, and therefore potential complainants, per entity.

It is a positive sign that as the Program continues to expand in size, in terms of applications, customer base, and entities participating in the Program, the share of Approved Vendors and Designees with complaints filed against them continues to be relatively small. Eighty four percent of Approved Vendors and Designees active in 2024 did not have a complaint filed against them. This likely indicates that while there are consumer protection and customer service issues within the market, these issues are not widespread across all entities participating in the Program and suggests that Program requirements and consumer protection efforts may have a positive deterrent effect on problematic activities.

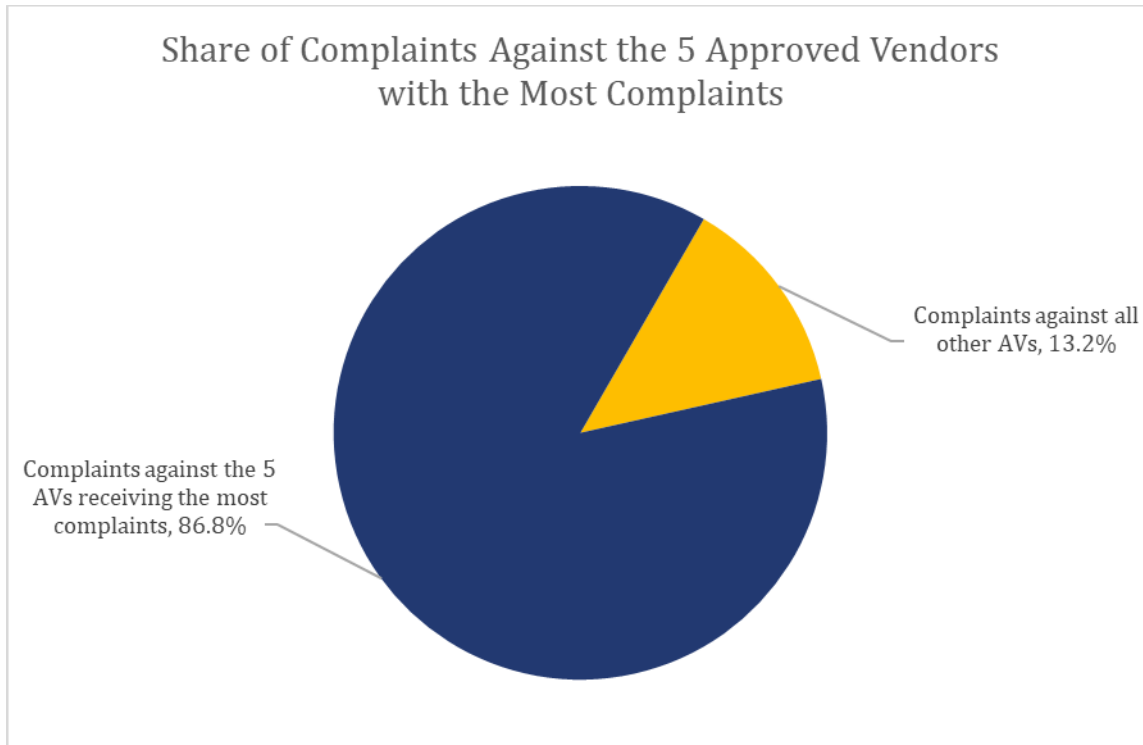


Figure 21: This chart shows the share of complaints against the five Approved Vendors with the most complaints in 2024 versus the rest of Approved Vendors who received a complaint. The five Approved Vendors receiving the most complaints each had five or more complaints in 2024.

Figure 21 shows that 86.8% of all complaints filed against Approved Vendors were filed against just five Approved Vendors. Nineteen Approved Vendors received complaints in 2023, while 32 Approved Vendors received complaints in 2024. The percentage of complaints against the five Approved Vendors with the most complaints in 2024 (86.8%) was higher than it was in 2023 (67.3%).

Notably, 63% of all complaints filed against Approved Vendors and 42% of all complaints (including complaints filed against Designees and non-Program entities) filed in 2024 were filed against a single company participating in the Program, Revolution Energy Systems, Inc. This is the largest concentration of complaints against a single entity in any Program Year (the second most being Power Home Solar receiving 18% of the total complaints received in 2022).

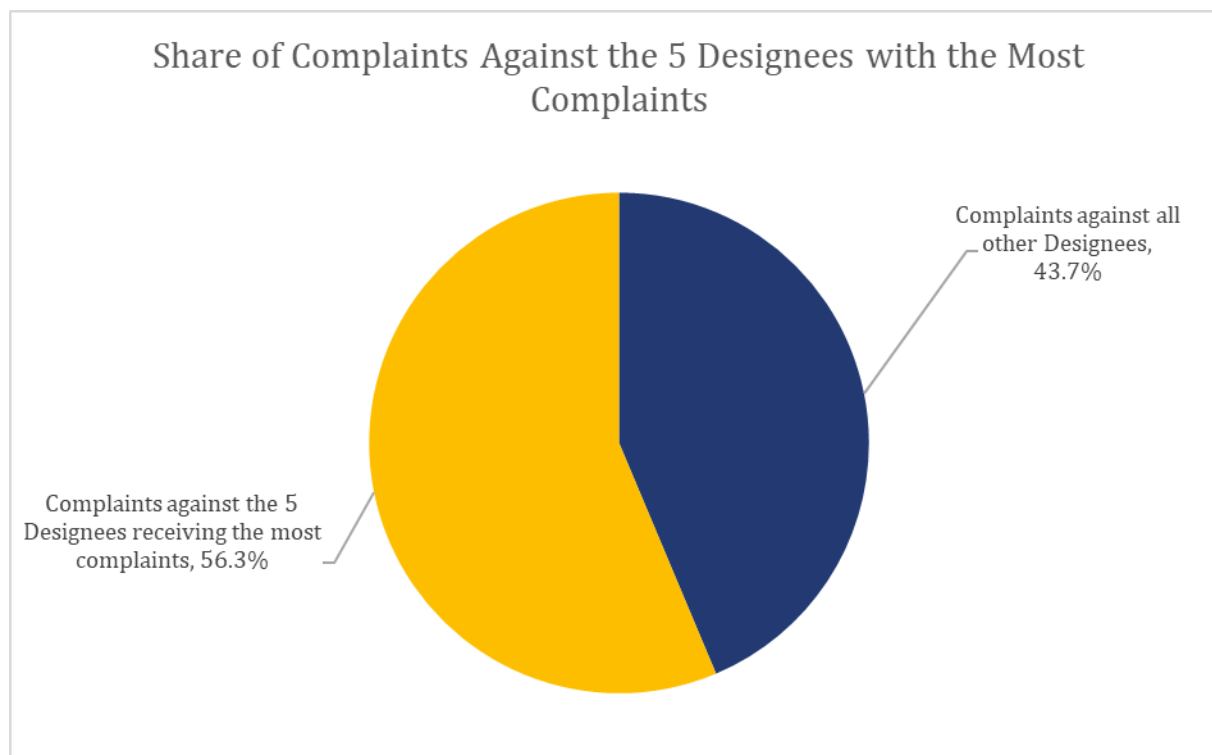


Figure 22: This chart shows the ‘market share’ of complaints against the five Designees with the most complaints in 2024 versus the rest of Designees who received a complaint. The five Designees with the most complaints received 13 or more complaints each.

Figure 22 shows that 56.3% of all complaints filed against Designees in 2024 were filed against just five Designees. Complaints against all other Designees made up 43.7% of complaints filed against Designees in 2024. Eighty-six Designees received complaints in 2023, while 123 Designees received complaints in 2024. The percentage of complaints against the five Designees with the most complaints in 2024 (56.3%) was higher than it was in 2023 (32.8%). Notably, Titan Solar Power received 34% of complaints filed against Designees in 2024, making it the Designee who received the most complaints in 2024.

The five Approved Vendors and the five Designees with the most complaints received in 2024 accounted for 75% (837 of 1,117) of the total complaints in 2024. In comparison, the five Approved Vendors and five Designees with the most complaints received in 2023 accounted for 43% of the total complaints in 2023.

Together, Figures 21 and 22 show that a small number of companies were responsible for most complaints received by the Program Administrator. In this way the Illinois Shines market appears to be different from the Alternative Retail Electric Suppliers (“ARES”) market,³⁶ where the majority of active ARES have complaints. In the six-month period from March 2024 to August 2024, 43 of the 69 active ARES had at least one complaint lodged against them, representing 62% of all ARES. By contrast, only about 22% of DG Approved Vendors active in 2024 had complaints in the 12 months of 2024, and only about 15% of DG Disclosure Form Designees active in 2024 had complaints in

³⁶ Electric consumers in the Ameren Illinois, ComEd, and MidAmerican service territories are able to choose who provides the supply portion of their electric service. Electric supply may be purchased from the public utility or an Alternative Retail Electric Supplier (ARES).

2024.³⁷ Even with active CS Disclosure Form Designees, fewer than one-third of the Designees received any complaints.

c. Trends in 2024 Complaints Received

The Program Administrator identified several patterns and issues of note among the complaints received in 2024.

- Concerns that Approved Vendors, Designees, or non-Program entities failed to submit applications³⁸ in a timely manner or portray an accurate timeframe of the application process continued to account for the largest number of complaints (294 complaints received).
- Delay or failure to pass REC payments to customers went from the least frequent complaint topic in 2023 (four complaints received) to the second most frequent complaint topic in 2024 (251 complaints received). This complaint topic had the greatest percentage increase in complaints received for a complaint topic compared to 2023.
- Mechanical/installation issues was a major driver of complaints for both “out of business” entities (105 complaints received) and “all other” entities (118 complaints received).
- Nonresponsiveness to customers continued to be a significant source of customer issues as it was the primary complaint subject for 23 complaints and the secondary complaint subject for 767 complaints in 2024. In 2023, nonresponsiveness to customers was the primary complaint subject for 35 complaints and the secondary complaint subject for 120 complaints.

Most Frequent Complaint Topic – Delays or Other Issues with Illinois Shines Applications

The Program Administrator received 294 complaints in 2024 where the customer expressed concern about a delay in the submission of their Illinois Shines application or errors within the submitted documents.

In 2024, the Program Administrator took steps to pause applications submitted by Approved Vendors who were found to have a pattern of failing to pass through promised incentive payments to their customers. Applications were paused for these entities to prevent or mitigate harm to additional customers and so the Program Administrator could create safeguards before allowing these applications to proceed toward verification. The Program Administrator provided customers whose applications were paused in the Part I application process (not yet Part I verified) with stranded customer resources so these customers could work to change the Approved Vendor for their applications through the Approved Vendor Switch process. Complainants with applications paused in the Part II application process (not yet Part II verified) may be able to receive assistance through the Escrow Process, REC Adder, and/or unbatching and reassignment processes discussed in Section 1 (“Introduction”) of this report. Of the 294 complaints received for this subject in 2024, 202 remain Under Investigation at the end of 2024, as the majority of these customers await implementation of these consumer protection initiatives.

Of the 24 complaints received against “all other” entities for this complaint category that were closed out in 2024, only three were marked as Closed, three were marked as Closed – Customer

³⁷ See <https://perma.cc/XG4J-PDXL> for a permalink to the March to August 2024 ARES complaint data, and the website for more information on ARES or for updated complaint data. Note that the Commission may track or count complaints differently than the Program Administrator.

³⁸ While only Approved Vendors can submit applications, Designees can cause delay in the submission by not providing required documentation or other information to the Approved Vendor.

Nonresponsive, and 18 were marked as Resolved. Many of these application delays were caused by Designees' nonresponsiveness and/or incomplete submission of application materials to the Approved Vendor, which were able to be resolved through the complaint process.

Other Complaint Topics – Delay or failure to pass through REC payment

The Program Administrator received 251 complaints in 2024 where the customer expressed concern about their Approved Vendor failing to pass a portion of the REC payment through to the customer. Ninety percent of the complaints in this category were filed against “out of business” entities. Seventy-one percent of the complaints in this category were filed against a single entity, Revolution Energy Systems Inc., which was suspended from the Program in February 2024 for its failure to pass promised REC payments through to its customers, among other things.

A total of 203 (81%) of the complaints in this category remain Under Investigation at the end of 2024. It is the Program Administrator's normal process to close out a complaint if the entity receiving the complaint misses three deadlines in a row. However, the Program Administrator has kept some complaints in this category open (even when an Approved Vendor or Designee is not responsive to its deadlines) while the Program Administrator has explored and pursued ways to potentially assist these customers. Some of these customers may be made whole through the Solar Restitution Program, which will launch in 2025. The first phase of the Solar Restitution Program will only be available for customers who were promised a pass-through incentive payment and did not receive it. These complaints will be marked as “Closed” once the Solar Restitution Program is ready to be implemented, as it is required that a complaint be closed as unresolved for a customer to be eligible for the Solar Restitution Program.

In 2024, more complaints were received against Approved Vendors than Designees for the first time in the Program's history. Ninety percent of complaints for the two most frequent complaint subjects in 2024, “Illinois Shines applications issues” and “Delay or failure to pass through REC payment,” were against Approved Vendors. The concentration of complaints received against Revolution Energy Systems, Inc., an “out of business” Approved Vendor, was a major factor in Approved Vendors becoming the entity type to receive the most complaints in 2024.

Other Complaint Topics – Mechanical/Installation Issues

Mechanical and/or installation issues comprised the primary subject for 223 of the 1,117 complaints filed in 2024 and was the most frequent complaint category for complaints against “all other” entities. Of these 223 complaints, 69% included a secondary complaint subject regarding the Approved Vendor or Designee's failure to respond to the customer.

Mechanical/Installation issues was the third most frequent complaint topic in 2024 and the second most frequent complaint topic in 2021-2023. In 2024, the Program Administrator launched an inspection process where projects are randomly selected for inspection to ensure that the information listed in the application matches the system that was installed and to ensure the system meets Program requirements.³⁹ Given the numerous complaints received for this topic over the years, the Program Administrator is exploring the possibility of its consumer protection team having the ability to refer complaints to the inspections team to perform inspections in certain cases of

³⁹ The current inspection process does not review for general workmanship issues.

alleged poor workmanship, in addition to inspections being performed for randomly selected projects.

Other Complaint Topics – Failure to Respond to Customers and the Program Administrator

Failure to respond to customers was the primary subject for 23 of the 1,117 complaints received in 2024. While it was only tied for the seventh most frequent primary complaint subject, it was the secondary subject for 69% (or 767) of the 1,117 complaints received in 2024. This indicates that it remains a significant issue, although it was often seen in conjunction with other more substantive issues. Typically, customers do not contact the Program Administrator regarding a mechanical issue, installation issue, or delay in receiving payment from their Approved Vendor unless the customer was not able to obtain a response from their solar installer or Approved Vendor regarding the issue. Many complaints therefore involve inadequate communication or responsiveness from Designees, Approved Vendors, and in some cases, solar companies not registered with the Program. The failure of Approved Vendors and Designees to meet deadlines set by the Program Administrator remains a leading cause for complaints to be marked as “Closed” rather than “Resolved.”

d. Complaint Examples by Complaint Subject

The complaints received by the Program Administrator in 2024 can be placed into 10 categories: 9 categories that describe the complaint subject, and a miscellaneous category for complaints that do not represent a trend in complaints received and therefore do not fall into one of the other categories. This section provides a summary of a representative complaint from each of the top five complaint categories received by the Program Administrator in 2024, which include:

1. Delays in submitting Illinois Shines applications or issues with the Illinois Shines application.
2. Delay or failure to pass through REC payments.
3. Failed mechanical components or issues with DG installation.
4. Failure to respond to customer.
5. Installation contract terms and/or financial issues related to installation.

These categories account for about 84% of all complaints received in 2024. The Program Administrator selected these sample complaints based on how well they represent each complaint category.

Illinois Shines Application Issues

Complaint date: February 2024
Complainant Type: Small DG Customer
Type of Entity: Approved Vendor
Complaint Summary: The customer’s Part I application was submitted and placed on the waitlist. The Approved Vendor was not responsive to the customer about next steps for this application.
Program Administrator Response: The Program Administrator notified the Approved Vendor of the complaint and requested it contact the complainant to address their concerns.
Entity Response: The Approved Vendor was prohibited from moving forward with Part I applications as a term of its suspension. The Program Administrator assisted the complainant through the stranded customer process, where the complainant was able to have their application transitioned to another Approved Vendor through the Approved Vendor Switch process. Since then, the application has been ICC approved and Part II verified. This complaint remains Under Investigation at the end of 2024 as the Program Administrator continues to correspond with the complainant and their new Approved Vendor to ensure the complainant receives their promised pass-through incentive payment in a timely manner, which is expected to be issued in early 2025.

Delay/failure to pass through REC payment

Complaint date: May 2024
Complainant Type: Small DG Customer
Type of Entity: Approved Vendor
Complaint Summary: This application was Part II verified in August 2023 and the customer was unable to get a response from their Approved Vendor for information on when they would receive their promised pass-through incentive payment. The Approved Vendor was suspended in February 2024 for its failure to pass incentive payments through to its customers.
Program Administrator Response: The Program Administrator notified the Approved Vendor of the complaint and requested it contact the customer and provide an update on the status of the customer’s payment.
Entity Response: The Approved Vendor did not provide a response to this complaint. The complaint remains Under Investigation at the end of 2024 as the Program Administrator continues to discuss with the Approved Vendor the possibility of a voluntary escrow process that may result in certain customers (like this one) receiving their promised pass-through incentive payments.

Mechanical or installation issue

Complaint date: February 2024
Complainant Type: Small DG Customer
Type of Entity: Approved Vendor
Complaint Summary: The system installation began in June 2023 and was completed in August 2023, but additional steps were needed for the system to be energized. The Approved Vendor caused delays and was nonresponsive throughout the complaint handling process.
Program Administrator Response: The Program Administrator requested that the Approved Vendor address the delay in the project receiving permission to operate from the utility. The Program Administrator requested a detailed timeline for the project, including the reasons for repeated inspection failures, as well as an explanation for the delays to address these system issues. Additionally, the Program Administrator requested that the Approved Vendor contact the customer directly to provide a comprehensive response and a proposed resolution to these concerns.
Entity Response: The Approved Vendor remained responsive during the complaint handling process and worked to address the fire setback code issues that were preventing the project from passing inspection. Subsequently, the system passed inspection, and the Approved Vendor submitted the necessary documents to the utility company to obtain permission to operate. The customer's system received permission to operate, and the Part II Illinois Shines application has been submitted and verified.

Installation contract terms

Complaint date: December 2024
Complainant Type: Small DG Customer
Type of Entity: Approved Vendor
Complaint Summary: This complaint, referred by the Illinois Office of the Attorney General, concerns the customer's objection to the Approved Vendor proceeding with a solar installation contract signed by the customer's now late husband during a period when the customer held power of attorney. In addition, the customer reported mechanical and installation issues, noting that their roof, being 20 years old, was unsuitable for the installation of a solar project. The customer also encountered delays and performance issues with the project. The Approved Vendor reviewed the contract and determined that there were grounds for termination. The customer was seeking Program Administrator assistance with confirming the termination of the installation contract from the Program, along with obtaining details regarding the necessary roof repairs once the system was removed, including photographic documentation of the completed repairs.
Program Administrator Response: The Program Administrator asked the Approved Vendor to confirm the cancellation of the customer's contract and provide pictures of the roof repair work completed during the system removal.

Entity Response: The Approved Vendor confirmed that it had terminated the customer’s contract and provided written confirmation of the same to the customer. The Approved Vendor removed the solar panels and provided photographic documentation of the removal process. Roof repairs are scheduled for completion in Spring 2025.

Misleading marketing

Complaint date: July 2024
Complainant Type: Small DG Customer
Type of Entity: Designee
Complaint Summary: The customer claimed that their Designee marketed a “free system funded by the government.” The customer contacted the Designee to cancel the project; however, the Designee said it would charge the customer a \$3,500 cancellation fee.
Program Administrator Response: The Program Administrator notified the Designee of the complaint and confirmed the customer was marketed the Illinois Shines program. The Program Administrator sought a response to the customer's claim that she was marketed a system that would be free to her. Additionally, the Program Administrator requested the Designee provide a response and relevant documentation regarding the \$3,500 cancellation fee, as the customer claimed they were told they could cancel without penalty before installation.
Entity Response: The Designee resolved the complaint by agreeing to cancel the installation contract and removing the cancellation fee. This complaint was marked as Resolved, as the complainant confirmed they did not have further questions or concerns. The Program Administrator did not receive documentation showing that this system was marketed as being free to the customer, however, the Program Administrator continues to investigate these claims, as the Program has seen a pattern of complaints regarding misleading marketing from this Designee.

e. Suspension Summaries

Between January 1, 2024, and December 31, 2024, the Program Administrator issued 87 suspensions and reinstated six entities. All suspensions last for three months (unless otherwise specified); however, reinstatement into the Program is not automatic and requires the Approved Vendor or Designee request reinstatement and complete reinstatement requirements provided by the Program Administrator. Five of the 10 entities that received the most complaints in 2024 were suspended, either in full or in part, due to issues initially raised by consumer complaints. In each case, after receiving a complaint alleging potential violations of Program requirements, the Program Administrator investigated the company’s actions, confirmed non-compliance, and ultimately suspended the entity from the Program. Consumer complaints from these five suspended entities accounted for 61% of all complaints received in 2024.

Fifty-four percent of the 87 suspended entities were suspended, either in full or in part, for failing to submit their Minimum Equity Standard (“MES”) Year-End Report; 15% were suspended in part for nonresponsiveness to complaints or to the Program Administrator; 15% were suspended in full or

in part for failure to timely submit a complete Approved Vendor renewal application; and 11% were suspended at least in part for failure to comply with state law regarding business registration. The remaining suspensions resulted from a variety of issues, including failure to register with the Program or comply with Program registration requirements, misrepresentation of identity and affiliation, misleading marketing regarding expected savings, failure to pass through promised REC incentive payments, and failure to meet contractual obligations.

Below is a summary of the 87 suspensions issued by the Program Administrator from January 1, 2024, to December 31, 2024, along with information regarding any appeal decisions made by the IPA:⁴⁰

02 BOO, INC. (DBA 02 ENERGY)

Entity Type: Non-Program entity

Reason for Suspension: PSG LMTD, Inc. and 02 Boo Inc. (d/b/a 02 Energy) were nonresponsiveness to the Program Administrator, failed to comply with Approved Vendor/Designee registration requirements, failed to comply with requirements surrounding required certification for distributed generation system installations, and failed to comply with state law requirements surrounding business registration. The suspension followed two separate NOPVs and a Warning Letter, related to the same issues.

Suspension Start Date: June 21, 2024

Appeal: None filed

Suspension Status: Suspended

All Things Roofing and Solar (DBA Woodside General Contracting)

Entity Type: Non-Program Entity

Reason for Suspension: All Things Roofing and Solar (DBA Woodside General Contracting) violated the terms of the Illinois Shines program when it marketed solar projects without properly being registered with the Program. The suspension letter followed a Notice of Violation (dated December 18, 2023) regarding the same infraction, to which the entity did not respond.

Suspension Start Date: May 23, 2024

Appeal: None filed

Suspension Status: Suspended

⁴⁰ This information is up-to-date as of the publication of this report, but as this information changes periodically, the most up-to-date disciplinary action information can be found here: <https://illinoisshines.com/violations-report-cp-complaint-report/>.

Bauer, Alex

Entity Type: Non-Program Entity

Reason for Suspension: Eleanore Electric, Nick Blaisdell, and Alex Bauer violated various Program requirements related to responsiveness to the Program Administrator, Approved Vendor/Designee registration, requirements surrounding required certification for distributed generation system installations, and failure to comply with state law requirements surrounding business registration. The Suspension followed three separate NOPVs, related to the same matters. The suspension was for six months.

Suspension Start Date: June 21, 2024

Appeal: None filed

Suspension Status: Suspended

Blaisdell, Nick

Entity Type: Non-Program Entity

Reason for Suspension: Eleanore Electric, Nick Blaisdell, and Alex Bauer violated various Program requirements related to responsiveness to the Program Administrator, Approved Vendor/Designee registration, requirements surrounding required certification for distributed generation system installations, and failure to comply with state law requirements surrounding business registration. The Suspension followed three separate NOPVs, related to the same matters. The suspension was for six months.

Suspension Start Date: June 21, 2024

Appeal: None filed

Suspension Status: Suspended

Direct Solar of America (“Direct Solar”)

Entity Type: Designee

Reason for Suspension: Direct Solar was suspended for repeated lack of responsiveness to the Program Administrator while investigating customer complaints. The Suspension followed a Warning Letter on November 21, 2023, and two separate NOPVs on October 2, 2023, for the same infraction, to which Direct Solar did not respond.

Suspension Start Date: July 23, 2024

Appeal: None filed

Suspension Status: Suspended

Eleanore Electric

Entity Type: Non-Program Entity

Reason for Suspension: Eleanore Electric, Nick Blaisdell, and Alex Bauer violated various Program requirements related to responsiveness to the Program Administrator, Approved Vendor/Designee registration, requirements surrounding required certification for distributed generation system installations, and failure to comply with state law requirements surrounding business registration. This letter followed three separate NOPVs, related to the same matters. The entity was suspended for six months.

Suspension Start Date: June 21, 2024

Appeal: None filed

Suspension Status: Suspended

Ethos Solar, LLC (“Ethos Solar”)

Entity Type: Designee

Reason for Suspension: Ethos Solar was suspended due to failure to timely submit its Designee Renewal registration. The Suspension followed a Warning Letter on June 5, 2024, and a Notice of Potential Violation on February 8, 2024, to which Ethos Solar did not respond.

Suspension Start Date: July 24, 2024

Appeal: None filed.

Suspension Status: Suspended

Green Home Systems LLC (“Green Home Systems”)

Entity Type: Designee

Reason for Suspension: Green Home Systems was suspended for repeated lack of responsiveness to the Program Administrator while investigating customer complaints. The Suspension followed two Warning Letters and five separate NOPVs, for the same infraction to which Green Home Systems did not respond.

Suspension Start Date: September 30, 2024

Appeal: None filed

Suspension Status: Suspended

Green Solar Technologies

Entity Type: Designee

Reason for Suspension: Green Solar Technologies was suspended due to failure to comply with state law requirements surrounding business registration and nonresponsiveness to the Program Administrator. The suspension followed a Warning Letter on October 4, 2024, and a NOPV on July 22, 2024, related to the same issues.

Suspension Start Date: November 27, 2024

Appeal: None filed

Suspension Status: Suspended

"Illinois Shines Solar Program"

Entity Type: Non-Program Entity

Reason for Suspension: "Illinois Shines Solar Program" was suspended for multiple reasons, including misrepresentation of identity and affiliation, misleading marketing regarding expected savings, failure to properly register with the Program, and failure to comply with state law regarding business registration.

Suspension Start Date: September 24, 2024

Appeal: None filed

Suspension Status: Suspended

Iowa Wind and Solar LLC d/b/a Simpleray ("Simpleray")

Entity Type: Approved Vendor

Reason for Suspension: Simpleray was suspended for failing to pass through promised REC incentive payments to its customers, failure to comply with contractual obligations, misrepresentations to customers, unfair business practices, and nonresponsiveness to customers. The entity was suspended for six months.

Suspension Start Date: March 14, 2024

Appeal: None filed

Suspension Status: Suspended

National Solar

Entity Type: Designee

Reason for Suspension: National Solar failed to respond to the Program Administrator regarding a customer complaint and failed to respond to a NOPV (issued on February 26, 2024) and Warning Letter (issued on May 10, 2024), related to the same issue.

Suspension Start Date: June 18, 2024

Appeal: None filed.

Suspension Status: Suspended

National Solar Service

Entity Type: Approved Vendor & Designee

Reason for Suspension: National Solar Service failed to respond to the Program Administrator regarding a customer complaint and failed to respond to a NOPV (issued on May 24, 2024) and Warning Letter (issued on July 9, 2024), related to the same issue.

Suspension Start Date: September 12, 2024

Appeal: None filed.

Suspension Status: Suspended

New Wave Solar LLC (“New Wave Solar”)

Entity Type: Designee

Reason for Suspension: New Wave Solar was suspended due to its failure to comply with state law requirements surrounding business registration, nonresponsiveness to the Program Administrator, and failure to submit a Minimum Equity Standard (“MES”) Year-End Report. The suspension followed three separate NOPVs and two Warning Letters, related to the same issues.

Suspension Start Date: December 23, 2024

Appeal: None filed

Suspension Status: Suspended

Noonday Solar

Entity Type: Designee

Reason for Suspension: Noonday Solar was suspended for chronic nonresponsiveness to complainants and to the Program Administrator during complaint investigations. The Suspension followed a NOPV on December 27, 2023, related to nonresponsiveness.

Suspension Start Date: February 21, 2024

Appeal: None filed.

Suspension Status: Suspended

Primitive Power

Entity Type: Designee

Reason for Suspension: Primitive Power was suspended due to nonresponsiveness to the Program Administrator and failure to comply with state law requirements surrounding business registration. The suspension followed two separate NOPVs and a Warning Letter, related to the same issues.

Suspension Start Date: September 25, 2024

Appeal: None filed

Suspension Status: Suspended

PSG LMTD, Inc.

Entity Type: Designee

Reason for Suspension: PSG LMTD, Inc. and 02 Boo Inc. (d/b/a 02 Energy) were suspended due to nonresponsiveness to the Program Administrator, failure to comply with Approved Vendor/Designee registration requirements, failure to comply with requirements surrounding required certification for distributed generation system installations, and failure to comply with state law requirements surrounding business registration. The suspension followed two separate NOPVs and a Warning Letter, related to the same issues.

Suspension Start Date: June 21, 2024

Appeal: None filed

Suspension Status: Suspended

Revolution Energy Systems, Inc. (“Revolution”)

Entity Type: Approved Vendor and Designee

Reason for Suspension: Revolution was suspended for multiple reasons including extensive mishandling of REC payments, failure to comply with contractual obligations, misrepresentations to customers, and unfair business practices. The entity was suspended for six months.

Suspension Start Date: February 2, 2024

Appeal: None filed

Suspension Status: Suspended

Smart Energy Solutions, Inc.

Entity Type: Designee

Reason for Suspension: Smart Energy Solutions, Inc. failed to remain in good standing with the State of Illinois and was nonresponsive to the Program Administrator. Smart Energy Solutions, Inc. failed to respond to the Program Administrator’s two NOPVs and a Warning Letter related to these issues. Entity originally suspended for three months.

Suspension Start Date: May 10, 2024

Appeal: None filed

Suspension Status: Suspended

Solar Comfort L.P. (“Solar Comfort”)

Entity Type: Designee

Reason for Suspension: Solar Comfort failed to remain in good standing with the State of Illinois and was nonresponsive to the Program Administrator. Solar Comfort failed to respond to the Program Administrator’s two NOPVs and a Warning Letter related to these issues. Entity originally suspended for three months.

Suspension Start Date: May 10, 2024

Appeal: None filed

Suspension Status: Suspended

Sun Life Energy, Inc (“Sun Life Energy”)

Entity Type: Designee

Reason for Suspension: Sun Life Energy was suspended due to its failure to comply with state law requirements surrounding business registration, nonresponsiveness to the Program Administrator, and failure to submit a Minimum Equity Standard (“MES”) Year-End Report. The suspension followed three separate NOPVs and two Warning Letters, related to the same issues.

Suspension Start Date: December 23, 2024

Appeal: None filed

Suspension Status: Suspended

SunPower

Entity Type: Designee

Reason for Suspension: SunPower was suspended as an affiliate of SunPower Capital Services, due to its failure to comply with contractual obligations with its customers following its filing for bankruptcy.

Suspension Start Date: November 6, 2024

Appeal: None filed

Suspension Status: Suspended

SunPower Capital

Entity Type: Designee

Reason for Suspension: SunPower Capital was suspended as an affiliate of SunPower Capital Services, due to its failure to comply with contractual obligations with its customers following its filing for bankruptcy.

Suspension Start Date: November 6, 2024

Appeal: None filed

Suspension Status: Suspended

SUNPOWER CAPITAL SERVICES, LLC (“SunPower Capital Services”)

Entity Type: Designee

Reason for Suspension: SunPower Capital Services was suspended for failing to comply with contractual obligations with its customers following its filing for bankruptcy. The Suspension followed two separate NOPVs related to failing to adhere to contractual promises and nonresponsiveness.

Suspension Start Date: November 6, 2024

Appeal: None filed

Suspension Status: Suspended

SunPower Corporation

Entity Type: Designee

Reason for Suspension: SunPower Corporation was suspended as an affiliate of SunPower Capital Services, due to its failure to comply with contractual obligations with its customers following its filing for bankruptcy.

Suspension Start Date: November 6, 2024

Appeal: None filed

Suspension Status: Suspended

SunPower Direct

Entity Type: Designee

Reason for Suspension: SunPower Direct was suspended as an affiliate of SunPower Capital Services, due to its failure to comply with contractual obligations with its customers following its filing for bankruptcy.

Suspension Start Date: November 6, 2024

Appeal: None filed

Suspension Status: Suspended

Titan Solar Power IL, Inc. (“Titan Solar Power”)

Entity Type: Designee

Reason for Suspension: Titan Solar Power was suspended for failure to comply with contractual obligations with its customers following the closure of its business operations. The Suspension followed a NOPV on June 24, 2024, related to nonresponsiveness.

Suspension Start Date: July 8, 2024

Appeal: None filed

Suspension Status: Suspended

U.S. Renewable Energy

Entity Type: Non-Program Entity

Reason for Suspension: U.S. Renewable Energy violated Program requirements by marketing solar projects intended to be applied to Illinois Shines without being properly registered as an Approved Vendor or Designee with the Program. The suspension followed a NOPV issued on September 27, 2023, to which U.S. Renewable Energy did not respond.

Suspension Start Date: January 12, 2024

Appeal: None filed.

Suspension Status: Suspended

US Direct Marketing Corporation (“US Direct Marketing”)

Entity Type: Non-Program Entity

Reason for Suspension: US Direct Marketing was suspended for nonresponsiveness to the Program Administrator regarding its Designee registration form. This Suspension followed a NOPV issued on December 22, 2023, to which US Direct Marketing did not respond.

Suspension Start Date: July 24, 2024

Appeal: None filed.

Suspension Status: Suspended

The following Approved Vendors and Designees were suspended for three months for failure to comply with Minimum Equity Standard (“MES”) requirements; each entity also failed to respond to Notices of Potential Violations and Warning Letters related to this noncompliance.⁴¹ None of the below suspensions were related to customer complaints.

Entity Name	Status
Alternative Power Consulting LLC	Suspended
Arrowpoint Energy, LLC DBA APC Solar	Suspended
Avvio Solar	Suspended
BA Solar Solutions LLC	Suspended
Bates Electric Inc	Suspended
Blue Chip Sales, Inc	Reinstated
Boyfriend Inna Box Construction	Suspended
BT Electric Inc	Reinstated
Castle Exteriors	Suspended
Cleanyte Inc	Suspended
Correlate Energy CORP.	Suspended
Ecohome Specialties	Suspended
Emerald City Solar	Suspended
EnergyOne Renewables	Suspended
Fort Sheridan Solar Provider, LLC	Suspended
Green Home Makeover LLC	Reinstated
Green Star Solar LLC	Suspended
Greenlite Solar	Suspended
Guev Solar	Suspended
Illinois Current, LLC	Suspended
K D Homes Builder LLC	Suspended
Life Center on the Green	Suspended
Lunar Solar Consulting	Suspended
Meraki Design & Construction	Suspended
Nevada Solar Energy/Apricot Solar	Suspended
NovaSource Power Services	Suspended
NRG Energy Inc	Suspended
Nusun Power LLC	Suspended
Pivot Power Co	Suspended
Pro Air HVAC	Suspended
Project Solar	Suspended
ProLux Energy	Reinstated
Renewable Power AZ LLC	Suspended

⁴¹ The below list excludes New Wave Solar and Sun Life Energy – both of whom were suspended both for failing to timely submit an MES Compliance Plan as well as failing to comply with state law requirements surrounding business registration. These entities are instead included in the section directly preceding this list.

Entity Name	Status
Repower Group LLC	Suspended
Revived Solar	Suspended
RMG Electric Inc	Suspended
Semper Solaris	Suspended
Service 1st	Suspended
So Ill Solar LLC	Suspended
Solar AI	Suspended
Solar Constructors 911	Suspended
Solar Power Pete	Suspended
Solarships Installation Services	Reinstated
SoulShyne Solar LLC	Suspended
Stellar Renewables	Suspended
Sun Source Energy	Suspended
Total Care Installs LLC	Suspended

The following Approved Vendors and Designees were suspended for three months for failure to timely submit a complete Approved Vendor renewal application; each entity also failed to respond to Notices of Potential Violations and Warning Letters related to this noncompliance. None of the below suspensions are related to customer complaints.

Entity Name	Status
Bella Power Services, LLC	Reinstated
Empower Energies EPC Illinois LLC	Suspended
Empower Energies RECs, LLC	Suspended
Galena Solar LLC	Suspended
Ice Plant Solar, LLC	Suspended
One Energy Solutions, LLC	Suspended
OYA Solar IL, L.P.	Suspended
Picktricity, LLC	Suspended
SolSage Solar LLC	Suspended
Steamboat Solar	Suspended
Sunbend LLC	Suspended

5. Illinois Solar for All Complaints and Analysis

a. ILSFA Consumer Complaint Data Summary

In 2024, the ILSFA Program Administrator received 17 customer complaints. This was a slight increase from 16 complaints received in 2023. The ILSFA Program Administrator received thirteen complaints in 2022, seven complaints in 2021,⁴² and six complaints in 2020. The 17 complaints were against three Approved Vendors (Advanced Renewable Concepts (formerly Helio), Nelnet (formerly GRNE), and Sunrun) and were all related to the Residential sub-program, which is exclusively DG projects. These three Approved Vendors represent over 90% of the solar installation project applications submitted to ILSFA in 2024, with a combined total of 695 out of 750 ILSFA projects completed in 2024. As the ILSFA program grows each year in terms of number of projects and participants, an increase in complaints can be expected. As mentioned previously, and similar to Illinois Shines, a complaint can be filed not only during marketing or installation, but at any time during the following years. This open-ended time frame for complaints to be received by the Program makes it possible for the pool of possible complainants to accumulate because a customer could sign a contract in 2020 and then file a complaint in 2024. This leads to an expected increase in potential complaints.

i. Complaints Received – By Complaint Subject

The Program Administrator tracks the subject of each incoming complaint. The subject categories of complaints have been modeled after the Illinois Shines program where appropriate. Additional categories may be created because the ILSFA program has different requirements than the Illinois Shines program and new trends may develop. The complaints received in 2024 were categorized under four topic areas: failure to respond to customer (1), mechanical or installation issue (6), issues related to contract terms (3), and miscellaneous (7).

In 2024, the most common complaints in ILSFA were categorized as miscellaneous or were about mechanical or installation issues. Examples of mechanical or installation issues include underperformance of a customer’s solar system or roof/property damage during system installation. Miscellaneous issues can include a wide variety of topics, which do not fit into one specific existing complaint subject. In 2024, all seven complaints that were categorized as ‘Miscellaneous’ arose from the situation that two Approved Vendors (Nelnet (formerly GRNE Solutions LLC) and Sunrun) made the decision to discontinue participation in the Residential sub-program for ILSFA, which resulted in cancelation of customer contracts/projects that had not begun installation.

Details regarding the number of complaints received by year and complaint subject category can be found in the table below (Figure 23). Eight complaint subject categories are included to represent complaints that were received in prior years, not all of which are categories relevant to 2024.

⁴² This is a correction from the 2021 report that stated there were 13 complaints in 2021; the complaint type table shows the corrected data. As the ILSFA Program Administrator established more standardized complaint categories this year, six complaints that were reported in 2021 were recategorized as inquiries or requests and will not be included as complaints moving forward.

Complaint Subject	Description	2020	2021	2022	2023	2024	Total
ILSFA application issues	The customer is concerned about errors their Approved Vendor made with their ILSFA application, or with a delay in the Approved Vendor submitting the application.			1			1
Failure to respond to customer	The customer has not received an adequate response from their Approved Vendor or Designee to a customer question or concern.	3	3	3	6	1	16
Issues related to contract terms	The customer is concerned about the terms of their installation contract, their financing agreement, etc.			1		3	4
Mechanical or installation issue	The customer is concerned about an issue with a physical component of their system (i.e., panel, inverter, microinverter, etc.), or reports property damage as a result of the installation.			2	3	6	11
Misleading marketing	The customer reports that they received misleading information related to expected benefits of the Program from the Approved Vendor.			1			1
Provided insufficient customer service	The customer reports lack of sufficient customer service (i.e., aggressive sales tactics, receiving insufficient program information, inconsistent or lack of communication, etc.).	2	4	5	4		15
Failure to screen for income eligibility	The customer is concerned they were not screened for income eligibility for the ILSFA program.				2		2
Miscellaneous	A complaint that does not fit any of the other categories on this list.	1			1	7	9
Total		6	7	13	16	17	59

Figure 23: This table shows the number of complaints received by the Program Administrator for each subject category of complaint for the years 2020, 2021, 2022, 2023, and 2024 with cumulative totals by subject, year, and overall.

ii. Complaints Received – By Approved Vendor

In 2024, complaints were received against three Approved Vendors—Advanced Renewable Concepts (formerly Helio), Nelnet (formerly GRNE), and Sunrun. These three Approved Vendors in combination completed 93% of the residential projects in the ILSFA program in 2024. See the table below for complaints received against Approved Vendor by calendar year. A separate category is listed at the end of the table for complaints against entities not registered with the Program.

Approved Vendors	2020	2021	2022	2023	2024	Total
Sunrun Installation Service Inc	1	2	3	9	5	20
Nelnet (formerly GRNE Solutions LLC)		1	3	7	11	22
Windfree Wind and Solar Energy Design Company	2		1			3
Nexamp Solar LLC	1	1	1			3
ComEd Give-A-Ray			2			2
Trajectory Solar, IL LLC	1	1				2
StraightUp Solar LLC		1	1			2
Xolar Renewable Energy			1			1
Advanced Energy Solutions Group Inc		1				1
Advanced Renewable Concepts (formerly Helio Solar LLC)					1	1
Non-Program Entity						
Kapital Electric Company			1			1

Figure 24: This table shows the cumulative total number of complaints and the number of consumer complaints that were filed against each company for the years 2020, 2021, 2022, 2023, and 2024. If a solar company or Program entity is not listed here, it means that the Program Administrator has never received a formal complaint against that company. Companies are organized in this table according to their role in the Program. “Non-Program Entity” is defined as an entity that is not registered as an Approved Vendor, Designee, or Subcontractor with the Program.

iii. Complaints Received – By Complaint Status

The ILSFA Program Administrator currently has six status types for complaints. The status types are:

- **New:** The complaint has been received and recorded but review or investigation has not begun.
- **Under Investigation:** This status indicates a complaint that is actively being investigated by the Program Administrator as of the date of release of this Report. A complaint remains in this status until (a) it is marked as Resolved, or (b) the Program Administrator determines that it is unable to reach a resolution between the parties, or (c) the complainant becomes unresponsive to the Program Administrator.
- **Resolved:** This status indicates a complaint where the Program Administrator was able to help the customer reach a resolution with the company, where the customer is satisfied with the company’s explanation for the issue, or where the Program Administrator is satisfied with the explanation given by the company.
- **Closed:** This status indicates a complaint where, after multiple attempts by the Program Administrator to help resolve the customer's concerns, the company did not resolve the customer’s concerns, or the Program Administrator and the customer were unable to receive

a satisfactory explanation from the company regarding the customer’s concerns. If the company violated Program requirements, the Program Administrator may consider disciplinary action. Even though the Program Administrator’s outreach to the company did not address the customer’s concerns, the Program Administrator may be able to provide additional assistance, such as providing resources for stranded customers, and the complaint can be re-opened if additional information becomes available.

- **Closed – Customer Nonresponsive:** This status indicates a complaint where the customer did not provide all the information necessary for the Program Administrator to investigate the complaint, or where the customer did not respond to the Program Administrator’s attempts to address their complaint. If the Program Administrator does not receive adequate documentation from the customer, the Program Administrator is unable to adequately work to resolve the complaint with the entity the complaint was filed against.
- **Reopened:** This status indicates a renewed complaint that had previously been marked as either “Resolved” or “Closed” by the Program Administrator. Reopened complaints are complaints where the customer contacts the Program Administrator stating that the same issue in their original complaint has recurred, or that a new similar issue has arisen.

In 2024, eight complaints were “Closed,” seven complaints were “Resolved,” and two remain “Under Investigation.” Seven complaints were “Closed” or “Resolved” within 40 days. An additional five were “Closed” or “Resolved” between 40 and 90 days, and the remaining three complaints from 2024 that were “Closed” or “resolved” in the same year took 91, 105, and 149 days) – our team experienced some delays due to various factors, mostly the complex nature of the complaints.

Status	Approved Vendor	Complaint Subject	Program Type	Date Complaint was Opened	Date Complaint was Resolved or Closed
Closed	Nelnet	Mechanical or installation issue	Residential	2/20/2024	5/21/2024
Closed	Nelnet	Mechanical or installation issue	Residential	2/29/2024	5/23/2024
Closed	Sunrun	Mechanical or installation issue	Residential	3/12/2024	6/6/2024
Resolved	Nelnet	Miscellaneous	Residential	3/13/2024	5/1/2024
Resolved	Nelnet	Issues related to contract terms	Residential	4/15/2024	5/3/2024
Closed	Nelnet	Mechanical or installation issue	Residential	4/15/2024	5/8/2024
Closed	Nelnet	Mechanical or installation issue	Residential	4/15/2024	5/23/2024
Closed	Nelnet	Miscellaneous	Residential	4/15/2024	6/6/2024

Status	Approved Vendor	Complaint Subject	Program Type	Date Complaint was Opened	Date Complaint was Resolved or Closed
Resolved	Nelnet	Miscellaneous	Residential	4/16/2024	5/22/2024
Resolved	Nelnet	Miscellaneous	Residential	4/23/2024	5/16/2024
Closed	Nelnet	Miscellaneous	Residential	5/31/2024	7/11/2024
Resolved	Sunrun	Miscellaneous	Residential	6/4/2024	7/11/2024
Resolved	Sunrun	Miscellaneous	Residential	6/18/2024	11/13/2024
Closed	Sunrun	Failure to respond to customer	Residential	7/9/2024	7/19/2024
Resolved	Nelnet	Mechanical or installation issue	Residential	8/21/2024	12/3/2024
Under Investigation	Sunrun	Issues related to contract terms	Residential	10/17/2024	
Under Investigation	Advanced Renewable Concepts	Issues related to contract terms	Residential	12/18/2024	

Figure 25: This table shows the status through the end of 2024 of each complaint received in 2024 listed by Approved Vendor, subject category of complaint, Program type, and date the complaint was opened and closed or resolved.

b. Trends in 2024 Complaints Received

As previously mentioned, with the growth of the ILSFA program, there has been a slight increase in the number of complaints year over year. As the Program grows, specifically in the Residential sub-program, Approved Vendors are working with more participants, which establishes a larger pool of possible complainants. Also, with the increase of projects in the Residential program, more complaints are based on issues that occur further along the ILSFA project process after projects have been completed and energized.

c. Suspension Summaries

Between January 1, 2024, and December 31, 2024, the Illinois Solar for All Program Administrator issued one suspension, and the entity was reinstated. All suspensions last for three months (unless otherwise specified); however, reinstatement into the Program is not automatic and requires the Approved Vendor or Designee request reinstatement and complete reinstatement requirements provided by the Program Administrator. The suspension resulted from the entity's failure to maintain its status as an Approved Vendor with the Illinois Shines Program, and reinstatement required that the entity be reinstated with Illinois Shines before it could be reinstated with Illinois Solar for All.

Below is a summary of the suspension issued by the Illinois Solar for All Program Administrator in 2024:

Bella Power Services, Inc

Entity Type: Approved Vendor

Reason for Suspension: Bella Power Services, Inc violated Program requirements by failing to maintain its status as an Approved Vendor in the Illinois Shines Program. Section X.D of the 2023 Consumer Protection Handbook, in effect at the time of this suspension, states: "If an Approved Vendor or Designee is suspended or has their Approved Vendor or Designee status revoked in the Illinois Shines program, the Approved Vendor will immediately be suspended or have their status revoked in the Illinois Solar for All Program, and vice versa." This entity was issued a suspension from the Illinois Shines Program on April 10, 2024, for three months, for failure to timely submit a complete Approved Vendor renewal application; they also failed to respond to Notices of Potential Violations and Warning Letters related to this noncompliance. The suspension is not related to customer complaints.

Suspension Start Date: April 26, 2024

Appeal: None filed

Suspension Status: Reinstated

6. Conclusion

Consumer protections are a fundamental element of both Illinois Shines and Illinois Solar for All. By tracking customer complaints, the Agency and Program Administrators are better able to understand market behaviors, potential gaps in Program requirements, and opportunities to address new trends or consumer protection concerns. The publication of complaint information, including visualizations and analysis, creates transparency for customers, companies, and other stakeholders.

Further, by including in this Report data related to disciplinary action taken against companies who violated Program requirements, the Program Administrators strive to demonstrate their efforts to hold entities accountable for violating consumer protection, and other, Program requirements. The Program Administrators will continue to enforce Program requirements and identify ways to proactively prevent entities from violating Program requirements—through continued market education, engagement in the monthly Consumer Protection Working Group, and other means.

Finally, in 2024, the Illinois Shines Program Administrator began to develop the processes that will support the consumer protection initiatives described throughout this Report. The Program Administrators look forward to next year's report, where they hope to detail the impact those consumer protection initiatives had on customers of both Programs, in addition to providing insight into their continued efforts to strengthening consumer protections in both Programs.