From: Josh Lutton
To: IPA.Solar

Subject: [External] Feedback on Consumer Protection Handbook

Date: Wednesday, March 26, 2025 4:39:31 PM

Dear Sirs and Madams,

Thank you for the opportunity to provide feedback on the draft Consumer Production Handbook.

As background, Certasun is Approved Vendor #1 under the Illinois Shines program, having been approved as such at the program's inception. We have sold and installed thousands of solar systems in Illinois since 2018.

In Section C.1., the Agency requests feedback on two options it is considering to address concerns that some consumers may not fully understand the mechanism of the Federal income tax credit (FITC). To our knowledge, we have not received a single complaint in over seven years relating to a customer's misunderstanding of the mechanism of the FITC. As a result, we believe both Option 1 and Option 2 are unnecessary overregulation. If the Agency believes particular Approved Vendors or their Designees are misrepresenting the FITC or failing to appropriately explain it, we recommend the Agency use its existing power to warn and — if necessary — suspend those participants. If the Agency nevertheless implements one of the options in the draft, we believe Option 1 is better.

We want to commend the Agency on the draft language relating to depreciation on the same page. We hope the Agency is considering suspension for program participants who have been suggesting residential customers can use deductions that are only available to businesses.

Sincerely,

Josh Lutton

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