



March 26, 2025

Dear Illinois Power Agency,

The Joint Solar Parties (JSP), comprised of the Solar Energy Industries Association (SEIA), the Coalition for Community Solar Access (CCSA) and the Illinois Solar Energy Association (ISEA), appreciate the Illinois Power Agency's dedication to strengthening consumer protections within the Illinois Shines program. Ensuring transparency, fairness, and operational feasibility is essential to maintaining a program that benefits customers while supporting a robust solar market. We recognize the efforts made to enhance compliance measures and improve oversight, and we offer the following comments to address concerns regarding document submission timelines.

### **Concern Regarding Document Submission Timeline Reduction**

We are concerned about the proposed reduction in the timeline for Approved Vendors (AVs) to provide copies of customer contracts and requested documents to the program, from 21 business days to 5 business days (Section IX, p.42). A five-day requirement is too restrictive and poses significant operational challenges, particularly for AVs managing a high volume of projects. Gathering, reviewing, and submitting documents within such a short timeframe may lead to unnecessary administrative burdens and potential compliance risks, without a corresponding benefit to consumer protection.

We propose a compromise timeline of 15 business days, which balances the need for timely submission with the practical realities of document retrieval and compliance. This adjustment ensures that AVs can meet their obligations without undue hardship while maintaining the IPA's goal of efficient program administration.

### **Conclusion**

We appreciate the opportunity to provide feedback and commend the IPA for its commitment to strengthening consumer protections. A reasonable submission timeline is essential to maintaining program efficiency while allowing AVs to meet compliance requirements effectively. We look forward to continued collaboration to refine the Illinois Shines program in a way that benefits all stakeholders.

Respectfully submitted,

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