



Illinois Shines

Building Our Solar Future

Marketing Overview

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Common Marketing Violations

Description of the Program

Statements about RECs and the nature of energy received by customers






Statements about customer savings and the nature of offers

Representations about identity and affiliates

Use of testimonials

In-Person Marketing

Illinois Shines Marketing Guidelines Overview

-  One way to make sure Illinois Shines is successful is by ensuring information provided to potential customers is clear, accurate, and not misleading.
-  Compliance with marketing requirements remains a top priority for the Consumer Protection Team.
-  Providing current and prospective customers with clear and accurate information about costs they will incur to participate in the Program can help ensure that they are confident in their decision to participate.
-  Robust consumer protections are important to building trust with customers and the public to ensure long-term success of the Program.
-  If an AV has questions about potential marketing language, please reach out to the Program Administrator for guidance.

Statements about RECs and Nature of Energy Received by Customers

AVs and Designees shall disclose their intent to sell RECs through the Program. Since the RECs are transferred to a utility, the system owner and/or third-party user of electricity should NOT claim to be using clean or renewable energy.



Acceptable language includes:

- *The renewable attributes (“RECs”) of this electricity will be sold by us to keep the cost of your panels affordable.*
- *Your solar project will create energy from the sun.*
- *Your solar project will contribute to the development of new solar power.*
- *Go green and support the installation of solar in Illinois.*



Unacceptable language includes:

- *Your home will run on cleaner, greener energy.*
- *There’s solar RECs, renewable energy credits, which you get from the state of Illinois.*
- *Help bring clean energy to your community.*

Describing the Program



Acceptable language includes:

- *Illinois Shines is a state-administered incentive program for new solar photovoltaic (“PV”) systems. The Program provides payments in exchange for delivery of Renewable Energy Credits (“RECs”) generated by PV systems over 15 or 20 years, dependent upon system type.*
- *The Adjustable Block Program is another name for Illinois Shines, and the name used in the Illinois Power Agency Act. Participation in the Adjustable Block Program is the same thing as participation in Illinois Shines.*



Unacceptable/not preferred language includes:

- *The Adjustable Block Program, also called “Illinois Shines,” was created as a way for utilities to obtain RECs from their customers who have renewable energy systems. **Solar system owners can take advantage of the Adjustable Block Program by entering a 15-year contract to sell RECs to their utility.** Under this contract, the utility offers an **up-front payment to the customer** for all the RECs their solar system is expected to generate over 15 years.*
- *Illinois Shines is a state-administered **rebate** program for new solar photovoltaic (“PV”) systems.*

Statements about Customer Savings & the Nature of Offers



Not acceptable language includes:

- *Eliminate your electric bill.*
- *Get paid by utilities to go solar.*
- *There are no added costs to join or cancel, no recurring subscription fees, and no "gotcha" moments. (CS context)*



Language that must be supported by an explicit savings guarantee in the customer's contract:

- *You are guaranteed to save money.*
- *You will save [x]% on your utility bill.*



Acceptable language includes:

- *Lower your electric bills.*
- *Save money by going solar.*

Statements about Customer Savings & the Nature of Offers

- AVs and Designees shall accurately portray prospective customers' anticipated costs and savings. AVs and Designees shall not make any demonstrably false or unsubstantiated statements about whether or to what degree an offer will save customers money.
- AVs and Designees may not claim that customers (a) are guaranteed to save money, or (b) will save a certain amount of money, unless the customer contract includes an explicit and binding savings guarantee mirroring that claim.
- AVs and Designees shall not make claims that an offer is “free,” “no cost,” or “\$0” unless the customer is guaranteed to not have any financial obligation for the solar project or community solar subscription.
 - Free/no cost/\$0 may only refer to offers in which there is a guarantee the customer will not pay anything (including, but not limited to, lease payments, power purchase agreement payments, subscription payments, enrollment fees, ongoing monthly fees, early termination fees, or tax obligations).
- Common complaints Consumer Protection receives regarding misleading marketing includes:
 - Claims that customers would no longer receive an electric bill.
 - Claims stating that "the state" would pay for a customer's solar installation or that rooftop solar would be "free."
 - Misinformation about a customer's SREC incentive and/or federal tax credit amounts.

Representations about Identity and Affiliates

- Approved Vendors and Designees, including individual agents and salespersons, shall accurately portray their identities and affiliations.
- "Approved Vendors and Designees shall not represent, make claims, or create the impression that they are affiliated with, endorsed by, or acting on behalf of any governmental body, government program, regulated or municipal utility, electric cooperative, or consumer group..."



Not acceptable language includes:

- We represent Illinois Shines.
- We are offering solar on behalf of Illinois Shines [or IPA].
- We are with the utility to save you money.



Acceptable language includes:

- Illinois Shines is a state program that provides an incentive for solar projects.
- We represent [entity name], which is a community solar provider/solar company.

Use of Testimonials

- All testimonials must be provided by an actual customer of the entity using the testimonial and include a disclaimer that individual customers' experience may differ.
- If the testifying customer received payment or other incentive to provide the testimony, the testimony must include a disclaimer stating that the customer received payment or incentive.
- Testimonials shall not make false claims, promise savings, or otherwise violate any of the requirements of these Guidelines. (For example, a customer saying that they eliminated their electric bill is prohibited.)
- Any testimonials that reference a customer experience from outside of Illinois must clearly state the location of the customer who had this experience.

Example: Testimonial from Jane Doe, St. Charles, IL

- We were impressed with the XXX's employees who came to install the solar panels on our roof. We could not be more pleased with XXX and how professional our salesperson and their crew worked.

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In-Person Marketing

Identification

- AV or Designee agents or representatives who engage in in-person solicitation for distributed generation projects under 25 kW or community solar subscriptions under 25 kW shall display identification on an outer garment.
 - Identification should include: the agent's full name, agent ID number, photograph of the agent and trade name and logo of the company the agent is representing.

Door-to-Door (D2D) Solicitation

- AVs and Designees must follow any local ordinances or requirements regarding D2D sales, including prohibited hours.
 - In the absence of applicable local ordinances or requirements, AVs and Designees shall not conduct in-person solicitation at residential dwellings before 9:00 a.m. or after 7:00 p.m. Pre-arranged consultations or meetings outside of these hours are permitted.
- An AV or Designee shall obtain consent to enter multi-unit residential dwellings.
 - Consent obtained to enter a multi-unit dwelling from one prospective customer or occupant of the dwelling shall not constitute consent to market to any other prospective customers in the dwelling.
- An AV or Designee's agent or representative shall immediately leave the premises at the customer's, owner's, or occupant's first request.

Thank you for watching!

For questions or assistance:

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