

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, May 2, 2025

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	
Designee/Nested Designee	
Consumer	
Government Agency	
Non-Profit Advocacy/Community Group	
Prospective Approved Vendor/Designee	
Other	

TOPIC 1	Upcoming launch of Solar Restitution Program
BACKGROUND	<p>Next week, the Agency and Program Administrator for Illinois Shines intend to launch the Solar Restitution Program - the first of three major new consumer protection initiatives previewed in the 2024 Long-Term Plan. The Solar Restitution Program is aimed at providing financial restitution to Illinois Shines consumers who have experienced economic harm through their participation in Illinois Shines.</p> <p>The first phase of the Solar Restitution Program allows customers to apply for restitution if their Approved Vendor received and failed to pass through their promised Renewable Energy Credit ("REC") incentive. To be eligible to receive restitution, customers must have first filed a complaint with the Program Administrator for the failure to timely pass through their promised REC incentive, and that complaint must be closed out by the Program Administrator due to there being no reasonable likelihood that the Approved Vendor will pay the promised amount. Claimants must file Solar Restitution Program claims within six months of their complaint being closed out – or six months after the launch of the Solar Restitution Program – whichever is later. Customers who have received a partial payment of the promised REC incentive will not be eligible for Phase I of the Solar Restitution Program. Claimants must attest that if they receive a restitution award and later receive some – or all – of their promised REC incentive from their Approved Vendor, they may be required to repay their restitution award to ensure they do not receive a total amount greater than their originally promised pass-through incentive payment.</p> <p>After a customer files a restitution claim, the Program Administrator will provide the Approved Vendor with an opportunity to respond to the claim prior to the Program Administrator making a claim award decision. Approved Vendors are required to be responsive to requests for information by the Program Administrator throughout this process.</p> <p>Currently, there are two caps on potential claim awards. The first is a \$30,000 cap</p>

	<p>per solar project. The second is a \$200,000 total cumulative cap on claims based on the conduct of a single Approved Vendor. Should the total amount of claims filed by customers of an Approved Vendor exceed the \$200,000 cap, the total amount payable to each successful claimant will be prorated accordingly. For example, if eligible claims for a single Approved Vendor amount to \$400,000, claimants will receive 50% of their approved claim amount given the AV cap (\$200,000) is 50% of the total approved claims (\$400,000).</p> <p>The Agency and Program Administrator anticipate expanding the Solar Restitution Program in the future to cover different bases for economic harm (such as installation-related damage), and later phases of the Solar Restitution Program will also be open to ILSFA customers.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>What questions do stakeholders have about the claimant eligibility requirements for the new Solar Restitution Program?</i> • <i>What questions do stakeholders have about the award caps and how the Program Administrator will prorate awards, as necessary?</i> • <i>What questions do Approved Vendors have about expectations for responsiveness to the Program Administrator during the restitution review process?</i>
MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> • One stakeholder asked if the Solar Restitution Program applies to Community Solar subscribers. The Program Administrator explained that it only applies to Small DG and Large DG projects, at present. • One stakeholder asked if restitution complaints must come from clients/customers or through an Approved Vendor. The Program Administrator explained that customers should file a Restitution claim themselves.

TOPIC 2	Non-Standard Offers and Disclosure Forms
BACKGROUND	<p>It has come to the attention of the Agency and Illinois Shines Program Administrator that some solar companies are beginning to use some offer models that may not be set up like a standard lease or PPA, but rather incorporate elements of both. Such models may not be entirely consistent with the assumptions and fields built into the standard Disclosure Form. The Program Administrators and the Agency are interested in learning about different types of offers for leases and PPAs and to discuss how they can be accurately portrayed in the Disclosure Form.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • <i>What sorts of nonstandard offer models, or models that blend elements of leases and PPAs, are companies offering / are other stakeholders aware of?</i> • <i>How are solar vendors filling out Disclosure Forms to ensure customers understand the offers?</i> • <i>What guidance from the Agency and Program Administrator would be helpful?</i>

MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> One community solar stakeholder commented that they are considering offering a check at the end of year to provide a true up on promised savings. They noted they could include this detail in the “Additional Information” section of the Disclosure Form. One stakeholder noted that the difference between lease and PPA may not be important to customers as both have someone else owning the system and a scheduled payment plan. He suggested making sure customers understand what they’ll be paying and how that is determined.
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TOPIC 3	Proactive participant outreach by AVs to ensure satisfaction, anticipate needs, and mitigate issues
BACKGROUND	<p>The Program Administrator for the Illinois Solar for All (ILSFA) Program is soliciting feedback and input on how to encourage Approved Vendors (AVs) to strengthen participant outreach efforts to customers once those customers begin to work with the AV.</p> <p>Specifically, the Program Administrator is interested in best practices for how AVs can have meaningful touchpoints with customers at milestones such as installation, at the outset of anticipated savings/utility billing, along with post-installation follow-ups (e.g., at 6 months, 9 months, or 12-months).</p> <p>The goal would be to proactively support customers by anticipating needs, addressing questions, and/or clarifying concerns, so as to resolve issues before the customer becomes dissatisfied or submits a formal complaint.</p> <p>The Program Administrator has seen instances where the lack of consistent touchpoints with AVs has resulted in participant confusion or misaligned expectations. In these instances, and due to lack of additional AV touchpoints during the participant journey, issues may go unrecognized until the issue escalates to a complaint.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> <i>What are common questions or concern areas participants have, and are there any distinct areas of confusion relating to the program?</i> <i>What proactive communication practices by AVs should be considered “standard practice”?</i> <i>Are there any preferred communication practices or protocols that the Program Administrator can encourage AVs to use with participants?</i>
MEETING MINUTES	<p>Stakeholder feedback included:</p> <ul style="list-style-type: none"> One participant noted that Community Solar projects with subscribers may take up to a year, at times, to be built and interconnected, which may cause customer confusion. Their company ensures it keeps subscribers updated during the interim, but stated it would be helpful if community solar providers could pre-register subscribers with the utility, so that customers who reach out to their utility in the interim could confirm their status.

	<ul style="list-style-type: none">• Stakeholders suggested that AVs and utilities should standardize providing a specific customer service phone number and email and update the customer at each milestone of their project.• One stakeholder suggested that web forms related to Illinois Solar for All, such as the Income Eligibility form, state an estimate of how long it will take to complete and whether the user can come back to the form without losing progress. Additionally, some participants' only form of internet is their phone, so it would be ideal to have web forms be more mobile-friendly.
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