

EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, November 7, 2025

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	36%
Designee/Nested Designee	18%
Consumer	0%
Government Agency	29%
Non-Profit Advocacy/Community Group	11%
Prospective Approved Vendor/Designee	0%
Other	0%

TOPIC 1	Consumer education on budget billing and community solar
BACKGROUND	<p>The Illinois Shines Program Administrator received a request from a stakeholder to discuss interactions between community solar subscriptions and utility budget billing.</p> <p>Budget billing levels out monthly fluctuations in electricity bills by setting baseline monthly payments. Customers on Percentage of Income Payment Plans (PIPPs) are required to be on budget billing. For community solar subscribers with budget billing in Ameren's service territory, the community solar credits apply to the monthly electric charges. However, the amount that the customer actually pays each month is based on the baseline budget billing amount, rather than the actual monthly electric charges. The actual monthly electric charges (which take into account the community solar credits) impact whether the customer is ahead or behind on their budget billing "balance." The budget billing balance is periodically trued up, and can be reset to a different baseline payment. The community solar credits will impact those calculations.</p> <p>How utilities apply community solar credits for budget billing customers is not within the scope of the IPA's jurisdiction. However, the Program Administrator and Illinois Power Agency are interested in getting feedback about how the interaction between community solar subscriptions and budget billing impacts the customer experience, how community solar providers account for this in marketing to potential customers, any other responses that community solar providers are taking, and ideas about consumer education.</p>
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none">• What consumer protection concerns do stakeholders have – or have stakeholders heard from customers – about the budget billing issues described above?• Are community solar providers changing marketing, communications, or other practices based on interactions between budget billing and community solar subscriptions?

	<ul style="list-style-type: none"> • How could the Program Administrator help address customer confusion about community solar budget billing?
MEETING MINUTES	<ul style="list-style-type: none"> • Multiple stakeholders noted that community solar customers on budget billing in Ameren territory are required to pay community solar subscription fees each month but will not experience the savings from their subscriptions until their budget billing true up. Stakeholders noted that they were not aware of this method of billing while signing customers up for subscriptions. • One participant noted that stakeholders may wish to join the Illinois Commerce Commission’s Data Access Working Group meetings, where additional discussions are being held with stakeholders around this item. • Multiple community solar subscription entities noted that they are not actively marketing subscriptions to customers on budget billing and PIPP due to the billing concerns raised by their subscribers. • Two stakeholders requested that the Program Administrator work to educate customers regarding the source of the billing concerns in situations where customers contact the Program Administrator to complain about this matter.

TOPIC 2	Workmanship expectations for solar installations
BACKGROUND	<p>Section I.A of the Consumer Protection Handbook requires that Approved Vendors and Designees “must perform all services in a workmanlike manner.” Further, the Consumer Protection Handbook states that “Approved Vendors and Designees must ensure that their work does not create safety hazards or property damage from poor workmanship, and that, for any roof-mounted project, the roof condition is adequate for the installation of a solar project.” Finally, the Consumer Protection Handbook states that “Approved Vendors and Designees must comply with all requirements set out in [the] Illinois Shines Program Guidebook and ILSFA Approved Vendor Manual for assessing a site’s suitability for solar and related to inspections of solar projects.”</p> <p>Since 2024, the Program Administrator for Illinois Shines has received a significant number of complaints from customers alleging workmanship-related concerns for their installations. In the 2024 Annual Complaints and Disciplinary Action Report, the Illinois Shines Program Administrator noted that mechanical and/or installation issues comprised the primary subject for 223 of the 1,117 complaints filed in 2024 – making it the third most frequent complaint topic that year. So far this year, the Illinois Shines Program Administrator has received 219 complaints related to failed mechanical components or other installation-related issues.</p> <p>The Illinois Power Agency and Program Administrator for Illinois Shines are interested in feedback from the market on installation-related workmanship as the Program Administrator begins to refer such complaints to the Illinois Shines Inspections team for investigation. Further, the Agency and Program Administrator</p>

	are exploring potential amendments to Program documents to address workmanship-related issues for the next Program Year and considering the development of additional consumer education resources.
ISSUES/ QUESTIONS TO DISCUSS	<ul style="list-style-type: none"> • How do Approved Vendors and Designees determine whether a roof condition is adequate for the installation of a solar project? • How do Approved Vendors and Designees determine whether electrical upgrades may be needed? At what point in the process should an Approved Vendor or Designee be expected to identify the need for upgrades? • What issues are common to an installation, and what issues do stakeholders believe constitute safety hazards or workmanship concerns?
MEETING MINUTES	<ul style="list-style-type: none"> • One stakeholder noted that they largely rely on the Authority Having Jurisdiction's (AHJ) requirements when performing preliminary site visits to determine whether any upgrades may be needed to move forward with a project. • Two participants noted that they will not sell projects to customers whose roofs are over a certain age. • One participant noted that third-party roofers may not provide accurate information to customers about the state of their roofs in order to upsell customers roofing work that they do not actually need. • Two stakeholders mentioned that a roof or electric system may look fine on the surface, but issues may be discovered during the installation or inspection processes that were not apparent during pre-installation site visits. Participants noted that they make customers aware that the customer is responsible for costs associated with electrical upgrades or other work discovered during an inspection that is not related to the solar installer's work.