EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, February 6, 2026

Poll Question Series 1:

Which marketplace participant best describes you?	
Approved Vendor	30%
Designee/Nested Designee	10%
Consumer	5%
Government Agency	30%
Non-Profit Advocacy/Community Group	10%
Prospective Approved Vendor/Designee	0%
Other	15%

TOPIC 1	**Soliciting feedback on sales agent practices when marketing Illinois Shines program offers alongside unrelated program(s)**
BACKGROUND	Section I.A of the 2025 Consumer Protection Handbook states that, "Approved Vendors and Designees shall conduct business affairs with the goal of openness and transparency and shall not seek to take advantage of or otherwise exploit a customer's lack of knowledge. Approved Vendors and Designees shall not make any claim that is false, deceptive, or misleading, whether by affirmative statement, implication, or omission." The Program Administrator understands that some sales agents acting on behalf of Approved Vendors or Designees in the Program may market multiple programs at the same time. For example, an agent might table at an event and attempt to sign customers up for an Illinois Shines community solar subscription while also marketing an unrelated offer, such as the Lifeline Program. The Program Administrator has seen social media marketing materials from some agents marketing multiple programs where the incentives to sign up for each program are intertwined. The Program Administrator and Agency are interested in what visibility and safeguards Approved Vendors and Designees have on this practice of multi-program marketing, and any concerns stakeholders have with the same as it relates to the Program requirements surrounding transparency and not misleading customers.
ISSUES/ QUESTIONS TO DISCUSS	• *How common is the practice of simultaneous marketing of unrelated programs?* • *What concerns do stakeholders have about any customer confusion that has been – or could be – caused by such dual marketing?* • *What training/guidance do Approved Vendors and Designees use for their sales agent on dual marketing?* • *What oversight/enforcement mechanisms do Approved Vendors and Designees use to confirm agents are following their training on this issue?*
NOTES	• One community solar developer noted it performs all subscriber acquisition work for Illinois Shines and Illinois Solar for All subscriptions in-house. They do not pair community solar offers with other offers, but they do

	encourage potential Illinois Solar for All customers to investigate Low Income Home Energy Assistance Program (LIHEAP) and other similar programs to see if they may be eligible to receive other types of assistance. • One Distributed Generation Approved Vendor noted that it has not seen any ads related to dual marketing.

TOPIC 2	Rolling Submission Window: ILSFA Residential Solar
BACKGROUND	On March 1, 2026, nine months will have passed since the beginning of the program year. Any remaining Energy Sovereignty and non-reserved funds from the Residential Solar (Large) sub-program will be combined with the Residential Solar (Small) sub-program. A rolling submission window will open on March 2, 2026, at 9 a.m. CT, allowing submissions for the Residential Solar (Small) sub-program. Funds can be used for any projects in the combined Residential Solar (Small and Large) sub-programs submitted by May 29, 2026, or until funds are exhausted, whichever comes first. Any remaining Environmental Justice Community carveout funds in the Residential Solar (Large) sub-program will remain available only for eligible Residential Solar (Large) projects sited in Environmental Justice Communities for the duration of the 2025-2026 program year. The Program Administrator is seeking insight from Approved Vendors and Designees intending to submit projects during the rolling submission window, particularly as it relates to transparency, consumer expectations, and project planning.

ISSUES/QUESTIONS TO DISCUSS	• *What safeguards will Approved Vendors/Designees put in place to prevent consumer confusion regarding project eligibility, timelines, or likelihood of funding as funds are reallocated?*
	• *How are Approved Vendors/Designees managing pipeline projects and customer expectations during the transition to a rolling submission window?*
	  o *How will vendors prioritize project submission (i.e. already under development versus new customer intakes) once rolling submissions begin?*
	  o *What best practices can Approved Vendors/Designees implement to support transparency and communication to their customers during the remainder of the program year as funds become limited or fully allocated?*

NOTES	• One stakeholder reported that the lack of timely and clear program information, particularly funding status—creates challenges in

	supporting customers. Additionally, they noted that when customers are signed up even after funding is exhausted, it leads to disappointment and complaints. • Another stakeholder emphasized the need for solar providers to manage expectations, improve communication, and begin marketing earlier to be better prepared for project submission. They also noted instances where customers began working with solar providers early but experienced no follow up, and later discovered that funding was already fully allocated, which caused frustration.