

**To:** Illinois Power Agency

**From:** Citizens Utility Board of Illinois

**Date:** March 20, 2022

**Re:** Comments on Illinois Shines 2026–2027 Draft Program Guidebook

**Submitted to:** IPA.Solar@illinois.gov

The Citizens Utility Board (CUB), an Illinois Solar for All Grassroots Educator, respectfully submits the following comments in response to the Illinois Shines 2026–2027 Draft Program Guidebook stakeholder feedback request.

## **Section 1**

### ***Section 1.J – REC Adder for Small Distributed Generation Customer-Owned Applications***

CUB supports the proposed REC adder for Small Distributed Generation (DG) customer-owned projects. As federal incentives evolve, there is an increased risk that customer-owned systems may become less financially attractive relative to third-party-owned systems. This dynamic could create additional barriers for consumers seeking ownership and lead to increased reliance on third-party sales models, which are often more complex and do not always provide the greatest value to consumers. CUB believes that the proposed REC adder is an important step toward maintaining access to customer ownership and supporting a more balanced and consumer-friendly distributed generation market.

## **Section 2**

### ***Section 2.D – Evaluation Criteria for Approved Vendors***

CUB recommends that the Agency expand its evaluation criteria for Approved Vendors by requiring a Statement of Good Standing from the Illinois Attorney General, in addition to the existing requirement from the Illinois Secretary of State. The Attorney General's office plays a central role in investigating fraud and enforcing consumer protection laws. Requiring documentation of good standing with the Attorney General would help prevent entities with a history of consumer protection violations from participating in the program and encourage Approved Vendors to maintain compliant and ethical business practices. This additional safeguard would meaningfully strengthen consumer protections within Illinois Shines.

### ***Section 2.G – Designees and Designee Registration***

CUB recommends that the Agency establish a distinct registration category for designees that provide financing services. Consumer advocates have observed patterns of concerning business practices among certain financing entities, including limited transparency and reduced accessibility for consumers seeking assistance or clarification. Creating a separate category for financing designees would improve program oversight and accountability, enable better tracking of financing-related complaints and trends, support enforcement of program requirements specific to financial products and services.

## **Section 3**

### ***Section 3.B - Process for program violations and potential violations***

Suggested edit in red (page 69): “If an Approved Vendor or Designee receives a formal warning letter, is suspended, or has their Approved Vendor or Designee status revoked, this fact, along with a summary of the Program violations, will be published on the Illinois Shines website. On a quarterly basis, the Program Administrator will remove warning letter summaries that were issued more than 12 months prior from the Illinois Shines website (or 24 months for cases where status was revoked). In addition, an Approved Vendor or Designee that is issued a warning letter but has addressed the underlying violations may request documentation from the Program Administrator confirming the resolution of the Program violations.”

CUB recommends a 24-month publication period for entities with revoked status. Even after removal from Illinois Shines, such entities may continue operating in the broader marketplace. Maintaining public visibility into past violations for a longer period serves an important consumer protection function by helping consumers make informed decisions and increasing accountability for entities with a history of noncompliance.

## **Section 4**

### ***Section 4.F – Evolving Technology: Shared Rooftop Solar for Multi-Unit Buildings***

CUB appreciates the Agency’s consideration of shared rooftop solar for multi-unit buildings and recognizes the rationale for treating these installations as single projects. However, CUB recommends that the Agency establish a REC adder for projects utilizing this technology. Shared

rooftop solar expands access to renewable energy for renters and residents of multi-unit buildings—populations that have historically faced barriers to participation. At the same time, these projects often involve higher costs due to the system sharing technology. A REC adder would help offset incremental project costs, encourage broader adoption of this emerging model and advance program goals related to equity and access.

## **Section 5**

### ***Section 5.E – Customer Communication***

CUB recommends that the Agency strengthen customer communication requirements for community solar subscribers awaiting project activation. Specifically, CUB recommends that customers receive an initial status update within three months of executing a subscription agreement and that customers receive monthly updates thereafter until the system becomes operational. Long periods without communication can lead to confusion, frustration, and reduced trust in the program. More frequent updates would improve the customer experience and support overall program credibility.

### ***Section 5.F – Consumer Protection Requirements***

CUB supports the Agency’s proposal to require Part I applicants to upload REC contracts for customer-owned DG projects. This requirement will improve the Program Administrator’s ability to resolve disputes efficiently, ensure access to contract terms in cases where an Approved Vendor is no longer operational, and strengthen enforcement of pass-through REC payment obligations.

CUB also supports the proposed requirement to upload installation contracts, leases, and Power Purchase Agreements. This measure will enhance compliance monitoring and auditing capabilities and provide valuable insight into evolving market practices and trends.

CUB further recommends that the Agency use this data to evaluate the impact of the ITC sunset on ownership models and the differences in consumer savings between customer-owned and third-party-owned systems.