

To the Illinois Power Agency and Illinois Shines Program Administrators,

Thank you for the opportunity to review and provide feedback on the proposed updates to the Consumer Protection Handbook, Contract Requirements, and the Stranded Customer REC Adder categories.

Proliance appreciates the continued efforts to strengthen consumer protections while maintaining a program structure that allows participating companies to operate effectively and deliver solar projects to Illinois customers. As a company working closely with customers throughout the project lifecycle, from initial education through project completion we support policies that promote transparency and consumer confidence.

Regarding the proposed updates to the Consumer Protection Handbook, we support the clarification of the definition of “customer” and the explicit prohibition on retaliation against customers who file complaints. Clear expectations around these protections help maintain trust in the program and ensure that participating companies operate under consistent standards.

With respect to the updated requirements related to electronic document signing, we understand the Agency’s intent to ensure that customers independently access and review disclosure documents. However, we recommend additional clarification regarding what constitutes acceptable technical assistance. In practice, some customers, particularly those who are less familiar with electronic communication tools may require basic guidance when accessing their email or reviewing electronic documents. Allowing limited technical assistance that does not influence the signing process may help ensure customers can successfully access their documents without creating unnecessary barriers to participation.

We also acknowledge the proposed updates regarding marketing of the Federal Investment Tax Credit. Given that the tax credit remains one of the primary incentives customers consider when evaluating solar, clear program guidance on compliant language would be helpful. Providing examples of acceptable explanations could help companies communicate accurately while reducing the risk of unintentional misrepresentation.

Regarding the proposed requirement to provide periodic updates to community solar customers whose assigned project has not yet been energized, we support the goal of improving transparency. At the same time, we encourage the Agency to consider providing guidance on reasonable communication intervals and acceptable update methods. Establishing a consistent framework could help ensure customers remain informed while minimizing administrative burden for participating companies.

We also appreciate the effort to reorganize and clarify the Contract Requirements. Improved structure and readability will be particularly helpful for smaller and newer program participants that are still developing internal compliance processes.

Overall, we support the program's efforts to strengthen consumer protections while continuing to encourage responsible market participation. We appreciate the opportunity to share feedback and look forward to continued collaboration with the Agency and Program Administrators.

Thank you for your time and consideration.

Sincerely,

Caitleen

Project Manager

Proliance General Contractors, Inc.