EXPANDED CONSUMER PROTECTION WORKING GROUP AGENDA

Friday, September 4, 2026

Which marketplace participant best describes you?	
Approved Vendor	36%
Designee/Nested Designee	7%
Consumer	4%
Government Agency	29%
Non-Profit Advocacy/Community Group	18%
Prospective Approved Vendor/Designee	0%
Other	6%

TOPIC 1	**Customer Satisfaction Concerns for Distributed Generation Lease and PPA Customers**
BACKGROUND	Over the past two Program Years, the Illinois Shines Program Administrator has conducted customer satisfaction surveys and held follow-up focus groups of survey respondents. On July 29, 2025, the Program Administrator released its 2025 Customer Satisfaction Survey Results and Analysis. Next, after conducting follow-up focus groups with survey respondents, on August 14, 2026, the Illinois Shines Program Administrator released its 2025 Customer Satisfaction Survey Focus Groups Results and Analysis. In these analyses, Lease and Power Purchase Agreement (PPA) customers reported far lower satisfaction levels than Purchase customers. For example, while 75% of Purchase customers who responded to the survey would recommend going solar to friends and family, only 47% of Lease and 43% of PPA customers said they would recommend going solar. In the focus groups, Lease customers who reported having negative solar experiences mostly tied those experiences to interactions with their sales representatives, alleging their agents: failed to disclose the annual escalation rate associated with the Lease price, misrepresented utility bill savings they would experience, and misinformed the customer on requirements around transferring the Lease when selling their home. Further, the survey results show that Lease customers may be less likely to compare offers before signing a solar contract. In 2025, 56% of Purchase survey respondents chose “Strongly Agree” or “Agree” to having shopped around before signing an installation agreement. Only 19% of Lease respondents chose “Strongly Agree” or “Agree” to this statement. Relatedly, the Program Administrator has conducted audits of Lease and PPA Disclosure Forms submitted in 2025 and has provided feedback directly to Approved Vendors regarding those findings. Here, we note a few high-level findings: Lease • Insufficiently clear explanations of the Date of First Payment and potential Fees associated with leases.

	• Merely referring customers to other documents for information related to loss or damage insurance exceptions, production guarantees, and transfer upon sale requirements, rather than providing those details in the Disclosure Form. PPA • Insufficient information about what customers must do to transfer the PPA upon sale of their home. • Insufficient information about fees related to system removal and early termination. • Final payment rate on Disclosure Form differed from rate on PPA. Given the sunsetting of the federal Investment Tax Credit for customer-owned systems, the Program Administrator has already seen an increase in the percentage of applications submitted to the Program that are for solar projects with Leases or PPAs (versus customer-owned projects) and a continued increase in complaints filed by Lease and PPA customers. Accordingly, the Program Administrator and Agency are exploring ways to address the negative experiences reported by previous Lease and PPA customers and considering potential Program requirement changes to help further protect Lease and PPA customers. For example, the Program Administrator is doing an analysis of PPA pricing offered by the market and is considering publicizing pricing information on the Program website to better inform customers. Similar publication of Lease-related pricing is also being considered. The Program Administrator and Agency are interested in feedback from stakeholders on ways to improve Lease and PPA customer experiences in the Program.
QUESTION TO DISCUSS	• *What thoughts or questions do stakeholders have about the potential publication of PPA and/or Lease rates and terms on the Program's website?* • *How can the Program Administrator and Agency ensure customers are better educated about Leases and PPAs before they sign agreements?* • *Are there any potential Program requirement changes the Agency should consider to improve Lease and PPA consumer protections?*
NOTES	• No participants raised concerns with the proposal of publishing PPA and/or Lease rates and terms on the Program website, while one participant was supportive. • Participants recommended certain changes to the Disclosure Form to improve customer education and awareness, whereas other participants said more value would come out of addressing the third-party sales dealer model that incentivizes sales over consumer satisfaction.

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<tr><th>TOPIC 2</th><th>Approved Vendor/Designee Presentation of Program Options</th></tr>
<tr><td>BACKGROUND</td><td>The Program Administrator for the Illinois Solar for All (ILSFA) Program is seeking feedback on how Approved Vendors (AVs) and Designees present program options to participants, particularly when helping customers understand the differences between Illinois Shines and ILSFA and determine which program best fits their needs.

Chapter VII of the Consumer Protection Handbook provides:

<blockquote>Representatives of Approved Vendors or Designees that are registered with ILSFA must be able to effectively screen interested customers for ILSFA eligibility, particularly income eligibility, and provide available ILSFA options if the customer seems to meet ILSFA eligibility requirements.</blockquote>
In past years, the ILSFA team has occasionally received complaints from individuals who appeared to meet ILSFA eligibility requirements but were instead directed toward Illinois Shines by their AV or were never informed that ILSFA existed as an option. Some participants reported learning about ILSFA only after their project was already underway, creating confusion, frustration, and missed opportunities for greater savings.

As the Program Administrator works to strengthen transparency and improve the participant experience, we hope to better understand how AVs and Designees currently communicate program distinctions, what challenges arise when presenting both options, and what additional guidance or resources could support clearer, more consistent messaging. Feedback will help identify opportunities to improve coordination, reduce participant confusion, and ensure that income-eligible households receive complete and accurate information about all available program pathways.</td></tr>
<tr><td>ISSUES/ QUESTIONS TO DISCUSS</td><td>For vendors registered with both Programs:
Does your sales team have the information and tools necessary to effectively explain both program options to customers?
If not, what additional support from the program administrators would be helpful?
How well does your team understand the process for screening potential participants for ILSFA eligibility?
If additional support is needed, what assistance from the Program Administrators would be most helpful?</td></tr>
<tr><td>NOTES</td><td>There was no discussion related to this topic.</td></tr>
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TOPIC 3	Storage for All Program Development Beginning Soon
BACKGROUND	As outlined in the Clean and Reliable Grid Affordability Act, the Storage for All program will be a low-income storage incentive program developed by the IPA that acts as a companion program to the already established Illinois Solar for All program. The Agency plans to begin the public stakeholder feedback process to inform the design and development of this program soon, with written feedback questions planned for release in September 2026 and a virtual workshop held in October 2026.
ISSUES/ QUESTIONS TO DISCUSS	• *Here is the link to email list for stakeholders interested in participating in the feedback opportunities:* https://lp.constantcontactpages.com/sl/FCUID4A/IPAS4A
NOTES	• There was no discussion related to this topic.