



Consumer Protection Initiative Series

Escrow Process



Protecting consumers throughout their Illinois Shines experience is a priority of the Illinois Power Agency and its Program Administrator. The Illinois Shines Consumer Protection team receives and investigates complaints and takes disciplinary action against vendors who have violated program requirements. The team also hosts a regular consumer protection working group, develops educational resources and tools, and provides other support to inform and protect customers.

The [2024 Long-Term Renewable Resources Procurement Plan](#) authorized the development of a new consumer protection initiatives, including the Escrow Process.

About the Escrow Process



Addresses an issue of AVs promising to pass through some of their Illinois Shines REC incentive payment to customers and then failing to do so



Developed by IPA and the Program Administrator with stakeholder feedback.



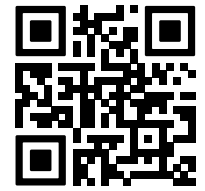
Launched in June 2025



Activated when there is a high likelihood that the AV would not pass promised REC incentives on to customers



Directs utilities to make REC incentive payments to a third-party escrow entity to distribute to customers, with remainder to AV



If you have concerns that you have not received some or all of your promised pass-through incentive, please visit our online [Complaint Center](#) or call 1-877-708-3456.



Escrow Process Success (Data current through August 2026)

- Prior to implementing the general Escrow Process, the Program implemented a voluntary escrow process with a specific Approved Vendor, which had been suspended for its failure to provide promised pass-through payments to its customers.
- In the voluntary escrow process, the utility paid Illinois Shines incentives to a third-party escrow agent, and the escrow agent passed promised incentive payments to the AV's customers. Rather than passing through the remaining incentive to the AV, the AV authorized the escrow agent to use those funds to repay other customers who did not receive their promised payments.
- 196 applications moved forward through this voluntary escrow process, and these customers received their promised pass-through payments from the escrow agent.
- This process also allowed the escrow agent to provide full, promised pass-through payments to another 39 customers who previously had not received their promised pass-through payment.
- **\$1,796,680 was paid out to the 196 customers whose projects went through the escrow process.**
- **\$406,594 was paid out to earlier customers who had not received their promised payments.**



"Thank you so VERY MUCH for resolving the ongoing issue with [the AV], making me whole in this process. I cannot state how appreciative I am for government working for the people of this state!"

– Illinois Shines customer



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Illinois Shines is administered by Energy Solutions on behalf of the Illinois Power Agency, an independent state government agency.