

Illinois Power Agency
160 North LaSalle Street
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

Comments on Approved Vendor Requirements

CSG respectfully submits comments on the Marketing Material Guidelines. CSG believes in strong consumer protections and fully endorses the application of standards for the market to follow. We support the IPA's efforts in creating these standards and wish market participants to have clear guidelines to follow. Our comments are mostly focused on the practical application of the standards as outlined in the draft documents. We are concerned that in practice some of the standards outlined may create confusion among customers.

CSG greatly appreciates the opportunity to participate in this stakeholder process and thanks the IPA and Administrator for reviewing our comments below.

Overlap of Approved Vendors and Installers/Developers

CSG understands that the IPA's interaction with market participants is largely through Approved Vendors (AV). Because of this we fully understand and anticipate that AV's will have to do some "policing" of behavior of other market participants. The issues outlined below apply to many other business models such as developers who subcontract out the actual installation or lead generation. But, as an SREC Aggregator, we are most familiar with the complications that will arise in that arrangement. A few scenarios are outlined below. We will go into more detail on the issues that arise in practice in the later sections of our comments.

The following arrangements occur between installers and AV's:

- Installer A - works with Aggregator 1
- Installer B - works with Aggregator 1 and Aggregator 2
- Aggregator 1 works with Installer A and Installer B
- Installer C does not have a preferred Aggregator, but instead tells customers to manage their system's RECS as they see fit

The relationships get more complex than these examples, but these should serve to illustrate issues later in our comments. Also, even though there are many distinct differences between installers, developers, and many other potential business models in the solar market we are using the term “installer” in these sections for simplicity's sake.

Name Badges

CSG fully understands that the IPA wishes for customers to be able to clearly identify who is at their door. However, listing the AV on the name badge can and will be in many cases confusing and misleading to the customer. Even in the simplest example with Installer A working with Aggregator 1 it is confusing to a customer. Someone will be at their door working for Installer A but with a name tag that shows Aggregator 1.

Things gets more confusing from there. If a company uses more than one aggregator the salesperson would have multiple name tags on, from multiple companies, none of which they directly work for. In the last situation, where an installer does not have a set AV they use, it is not clear what company should be listed on the name badge. In all these scenarios the ultimate harm is to the customer who is at best confused and at worst not eligible for a REC contract.

Because of this, we recommend that the company listed on name badges should refer to the company the person works for and not the AV or AV's they are affiliated with. This will result in the clearest most understandable message to the customer on top of being the only method that will consistently work for multiple business models.

Do Not Contact List

The issues with the Do Not Contact list are slightly different. CSG understands the need for a no contact list, but again it should be applied at a company level. If in example 2 above AV 1 is working with Installer A and Installer B, and a customer asks not to be contacted by Installer A it does not mean that they do not wish to be contacted by a totally unrelated business, installer B. In fact the customer may be very interested in solar, but just does not like Installer A. This restriction harms the customer because it could even limit the number of quotes a customer is getting from potential installers.

As with our suggestion above the Do Not Contact list should be maintained and implemented on a company level and not at the AV level.

Other Procedural Issues

There are also several procedural issues that follow along with the lines of our comments above. If an installer is using no set AV or multiple AV it is unclear how their marketing materials will be submitted for review. The same applies to the generation and submission of Standard Disclosure Forms.

The issues highlighted above are the ones that stuck out to CSG as most obvious. However, when developing the rules of the program CSG urges the IPA and the Administrator to consider how they will apply to, and be implemented by the business arrangements listed in our comments.

Existing Systems

As is covered in the LTRRPP systems that were built or contacted by solar installers before all the program rules were written create a unique situation. CSG is not asking for a specific exception to be made for each of the rules outlined in the Marketing Guidelines, but is simply asking that systems installed by good actors are not prevented from participating in the ABP because of a rule that was not yet defined at the time of contact. We understand that basic rules like connected to the grid and system installation by a Certified Person cannot be avoided, but, the requirement to follow rules like ID Badges should only be applied after they are finalized by the IPA and companies have had reasonable time to implement the practice.

Green Claims

CSG would like to ask for a clarification to be made on the green claims that can be made on marketing materials. If RECS are purchased for the system owner to replace the ones sold in the ABP there are many marketing claims of using renewable power that can be accurately made. We have attached the EPA guidelines on replacing RECS for your reference:

<https://www.epa.gov/sites/production/files/2017-09/documents/gpp-rec-arbitrage.pdf>

Electronic Signatures

CSG would like to ask that electronic signatures be accepted on all documents required for participation in the ABP. This is especially important given the number of documents and the short timeline to get them ready for program launch.

Electronic Copy Documents

CSG would also like to ask clarification that retention of electronic copies of all required documents satisfy the document retention requirement. Many of our documents are already electronic only. It would be a large administrative and financial burden to print them just for retention purposes.

Utility Account #

As was discussed in the workshop utility account numbers are listed on utility bills that are often collected by solar installers early in the process of designing a system. These bills generally contain the utility account number. CSG realizes that collecting utility account numbers was a large issue for bad actors in the ARES industry. The DG solar market works in a much different manner so prohibiting the collection of account numbers before a contract is signed is not an issue for customer protection.

Furthermore, utility account numbers have been a required piece of information for all of the previous rounds for the DG and SVP procurements. This information was handled safely and without issue as far as CSG is aware. If the utility account number is again a required data point for a system's inclusion in the ABP it will be an extra step for customers to take after signing their contracts.

Standard Disclosure Process

CSG has no specific comments on the content of the Standard Disclosure Documents, but would like to ask for the opportunity to comment on the process of generating and managing the documents once that process becomes available.

Timeline for Review and Approval of Marketing Materials

CSG would like to reiterate our comments made on the Approved Vendor Requirement. It is imperative that there is a clear timeline and process set for the review and approval of marketing materials. We fully support the JSP comments in this area.

Sincerely,



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