

Illinois Power Agency  
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InClimate, Inc. - Program Administrator

## **Comments on Approved Vendor Requirements**

CSG would like to thank the IPA for their continued willingness to accept comments from stakeholders. We understand the need for Approved Vendor (AV) requirements and restrictions. We are more than willing to disclose the information needed to ensure that the companies that are acting as AV's are able to successfully manage the role now and for years to come. Our comments are in the vein of making sure that the information collected is relevant to and representative of the company's ability to act as an AV.

We also will touch on other aspects of AV role not specifically outlined in AV requirements, but relevant to the discussion at hand.

### **Creation of Review/Appeal Process**

CSG fully respects and appreciates the IPA's ability to be a fair arbiter of the rules and guidelines set around the AV approval process and when reviewing marketing materials. However, it is inevitable that disputes will arise. A designated process that enables AV's to appeal decisions made by the IPA or Administrator is extremely important to the smooth administration of the ABP. A formal designated appeals process allows for disputes to be resolved in a consistent manner.

The JSP offer a more nuanced proposal on this topic in their comments. CSG fully supports the JSP's comments on this matter.

### **Marketing Materials**

CSG completely agrees with the need for limitations and guidelines to be set for marketing materials. It is very important that the messages received by the public are correct and somewhat consistent in content. CSG does have some comments on the specific marketing guidelines that we will offer in our comments on the marketing materials. However, as the process of reviewing marketing materials is part of the AV attestation we offer some comments on the process in general.

The submission and approval of all marketing materials before their use is an extremely large administrative burden for both the AV's and the IPA and the program administrator. CSG would prefer a set of guidelines that need to be followed. AV's could submit sample materials to ensure that they are following the guidelines, but it will be extremely time consuming to submit every marketing material for review and approval.

If this requirement is kept, CSG would like to ask for the following additional standards to create more clarity on what is covered and not covered under this attestation:

- Scope of what constitutes a marketing material. E-mails, brochures, pamphlets, website changes, direct mailings, etc.?
- Scope of what contractors and subcontractors are required to submit documents. Installers, panel manufacturers, software providers, etc.?
- What materials are covered by companies engaged in multiple markets in multiple states and countries. Illinois based installers that also install car chargers, multi-state and international solar companies, etc.?

Additionally, a timeline for the review and approval of marketing materials is vital to running a successful business. A set timeline from when documents are submitted to when they are returned to the AV would be extremely beneficial if not necessary to running businesses and marketing campaigns.

### **Definition of a REC**

On a lighter note as mentioned at the workshop last week here is our attempt at a concise definition of a REC:

A REC, or Renewable Energy Credit, is a digital credit representing the renewable attributes associated with one Megawatt hour of renewable electricity. When renewable energy is generated the electricity and the "renewableness" of the same electricity are tracked separately. Using solar panels as an example, as the sun shines solar panels generate electricity. The electricity that is generated gets used by the home or business where the panels are located, or gets put on the grid to be used by other homes or businesses nearby. The electricity itself is tracked and accounted for with a Net Metering Agreement or Power Purchase Agreement between the generator and the buyer of the power.

The renewable attributes of that same electricity are tracked and transacted on a third-party tracking system, such as PJM-GATS or MRETS. These tracking systems receive meter readings from renewable energy generators and create one REC for every MWh of power generated. RECS can then be bought,

sold, and transferred on the tracking system completely separate from the electricity that was generated. The end buyers of RECS, such as utilities, are able to keep or “retire” RECS to meet their renewable energy goals. Furthermore, the term SREC or Solar Renewable Energy Credit is also sometimes used. SREC simply denotes that the REC was generated by solar power.

### **Contract Requirements**

As was briefly discussed at the workshop it would be very helpful if contract guidelines were published. AV's are currently in the process of engaging with system owners on their REC contracts. In order to minimize the amount of modifications and addendums added to these contracts it would be very helpful to have some rules and guidelines on what must be and what cannot be in REC contracts. Even a simple list like the IPA has provided for the DG and SPV procurement LOI's in the past would be very helpful.

### **Approved Vendor vs Approved Installer/Developer**

As discussed in the workshop it may be beneficial to create a secondary role or method of tracking installers and developers that are not also acting as AV's. This would improve document flow, specifically with marketing materials and the Standard Disclosure forms. This role would not be a formal contract holder in the program, but instead would be a method to better track behaviors in the market. This role would also serve to insulate installers or developers using the same AV from issues with another.

This role should not have any requirements or an approval process, but instead should be either a separate log-on or a tag that can be used within the ABP Portal to identify marketing materials and systems belonging to a specific installer or developer by the AV.

Sincerely,



Dylan DeBiasi