



Carbon Solutions SREC

2045 W Grand Ave Ste B, PMB #58751

Chicago, IL 60612

312-971-6245

SREC@carbonsolutionsgroup.com

Illinois Power Agency
160 North LaSalle Street
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

Comments on Update to ABP Marketing Guidelines

Thank you for the opportunity to comment on the updated Marketing Guidelines. We have responded to these comments in two sections. The first responding to the 4 questions asked in the Stakeholder Feedback Request and the final section addressing other feedback. We find the updates to be in general helpful and simply adding clarity to existing rules. However, as we state later in our comments we request that the IPA and Program Administrator allow time for any updates to be implemented by Approved Vendors and their subcontractors. Even minor process changes can be time consuming to implement across the many layers of companies participating in the ABP Program and time allows updates to be implemented in a less stressful and more thoughtful manner.

Responses to questions in stakeholder feedback request:

1. Are the alterations made in the draft Marketing Guidelines sufficient to capture the spirit and purpose of the HEAT Act? If not, what provisions should be included to ensure that HEAT Act protections are extended to Program participants under the Marketing Guidelines?

This is outside of our expertise. We have no specific questions to offer in response to this question.

2. The disciplinary process that occurs when an Approved Vendor or its designee do not act in accordance with Program requirements is now outlined in the draft Marketing Guidelines. Is this disciplinary process outlined adequately? Are additions needed to clarify this process?

We appreciate the IPA seeking feedback on the Disciplinary Process. Our experience this far has been that the process has been fair and fairly easy to navigate. We would like to thank the IPA and the Program Administrator for the way this process has been implemented so far.

3. Changes were made to the section of the draft Marketing Guidelines that provide examples for what Approved Vendors and their subcontractors may or may not say about the Program in their marketing materials. These changes were made based on review of marketing materials during the first year of the Program. Are these examples sufficiently representative of expected phrasing to support to Approved Vendors in their effort to create viable marketing materials for potential Program participants? How else, or through what additional examples, should the IPA provide clarity regarding the application of its Marketing Guidelines?

We find the new examples to be a large improvement over the initial Guidelines. We generally find the new examples to be sufficient and understand that not every nuance can be outlined in the guidelines and we anticipate still having questions on specific materials in the future, but the new language clears up a lot of the grey area questions we have had in the past.

4. The IPA is considering allowing Approved Vendors to use the Illinois Shines logo on materials which state that they are an Approved Vendor in the Illinois Shines program. Under this proposal materials that use the Illinois Shines Logo (including online or social media posts) must include the legal name of the entity on behalf of whom the individual is marketing, and should also include the actual Approved Vendor participating directly in the ABP where possible, and cannot otherwise imply that the Approved Vendor is acting as a representative of the State of Illinois. Does this seem to be a viable solution to ensure that customers are able to easily identify Approved Vendors as verified and trustworthy Program participants? If you are in favor of creating this option, do you have recommendations for how to prevent the misuse or appropriation of the logo by entities not authorized to use it?

We do not oppose this change, but have not found the current rules to be a hindrance in this regard.

5. Are there any other revisions to its Marketing Guidelines that the IPA should consider?

Please see below:

Time to Implement Updates

To reiterate our comments made in the introduction process and rule changes such as the ones proposed in the new Marketing Guidelines will take time to implement effectively. Aggregators like our company especially need time to implement updates because we need to produce new

materials internally, then have time to decimate our installers and then installers to subcontractors and then some of our designees need to pass on the new information to companies that they subcontract to in turn. Because of this and because of the challenges many solar companies are already having due to remote work and COVID-19 we request at least 60 days to implement any updates.

Section 12

We think it would be very helpful to have example or baseline training documents provided by IPA/Program Admin. Obviously each Approved Vendor would need to add in company specific training as well, but beginning with a baseline training that is consistent across all Approved Vendors would be greatly beneficial. We would be very open to contributing to the baseline training and would appreciate the opportunity to participate in a workshop or comment period regarding training.

Conclusion

Thank you again for the opportunity to comment.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

Dylan DeBiasi