



April 28, 2020

via Email

Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, Illinois 60602
IPA.Solar@illinois.gov

Re: Feedback on ABP Community Solar Marketing Guidelines and Disclosure Form

Illinois Power Agency,

US Solar offers the following in response to the IPA's April 3 request for feedback regarding the Community Solar Disclosure Form and draft revised Marketing Guidelines.

Community Solar Marketing Guidelines

We support the idea of allowing Approved Vendors to use the Illinois Shines logo on materials which state that they are an Approved Vendor in the Illinois Shines program. Given the other requirements and safeguards set forth in the draft revised Marketing Guidelines, we believe that allowing Approved Vendors to use the Illinois Shines logo would help add legitimacy to the Program and help potential subscribers easily identify authorized vendors.

Community Solar Disclosure Form

In our experience, the current Disclosure Form appears to be meeting the ABP's minimum goal of educating subscribers re: the most relevant aspects of a given community solar offering. Unfortunately, the current Disclosure Form is not very flexible, and the Disclosure Form requires some subscribers to execute the same form multiple times – whether due to a change in project the subscriber is allocated to, a change to the Approved Vendor, or the fact that the subscriber has multiple eligible meters, etc.

To improve the usability of the Disclosure Form, and to reduce the need for redundant paperwork that imposes unnecessary customer costs and frustration, we provide the following responses to the numbered questions in the April 3rd request for feedback:

#1. We encourage the IPA to allow for the inclusion of a schedule of potential projects on the disclosure form, to allow for downstream assignment of a customer to an individual project. This is a common practice in other community solar programs, where the developer's subscription agreement clearly discloses that the developer shall have the ability to allocate the subscriber to one of multiple potential projects (*i.e.*, depending on which project achieves commercial operation first), as long as that allocation does not adversely

impact the subscriber's per-kWh economic benefits under the subscription. The subscriber would then be notified within 30 days of being placed in a specific community-solar project.

Likewise, the subscribing organization should also be allowed to reallocated all or part of a given subscriber's capacity to another community solar project during the term of a subscription agreement, as long as that is explicitly allowed in the subscription agreement and does not adversely impact the subscriber's economics. Allowing for this approach would reduce the need for redundant paperwork, where a subscriber is required to sign the same disclosure forms multiple times.

#2. We also support the IPA allowing a schedule of Approved Vendors to be listed on a disclosure form, to allow for the downstream assignment of a customer to an individual Approved Vendor. Not requiring a new disclosure form to be signed and by providing notice within 30 days of when a customer's subscription is assigned to a new Approved Vendor seems adequate and transparent.

#4 & 5. US Solar encourages the IPA to modify the Disclosure Form to allow for a list of the subscriber's electric utility account numbers on the form. This information is required by the utilities, which require the subscribing organization to allocate subscriptions to a specific electric utility account. But for customer that has multiple service addresses and/or account numbers, executing multiple forms is cumbersome and repetitive. This change would streamline and improve the agreement execution process by reducing the amount of redundant paperwork a customer must sign to subscribe to a project.

We also respectfully request the ABP to enable **batch processing** for the Disclosure Form generator. Currently we must update a separate spreadsheet file for each and every new Disclosure Form we request. Instead of doing that, we would like the ability to upload a single spreadsheet that has separate rows for each subscriber. This modification would significantly reduce the time and cost it takes to separately create, save, and upload Disclosure Forms for hundreds of residential subscribers, and would significantly improve to current platform. This way, generating Disclosure Forms could be a daily or weekly task when generating proposals, rather than something that must be done one at a time. All of those clicks add up. We would also request that we are able to batch upload multiple signed disclosure forms (for forms not sent through the platform's e-signature), but understand that might be a more significant change.

#8. Finally, we note an apparent discrepancy between the subscription size as (1) entered into the CSV Template disclosure form, and (2) populated in the corresponding Disclosure Form. Specifically, when populating the CSV Template provided by the ABP, the Subscription Size is requested in kWh_{AC}. But when the corresponding Disclosure Form is populated, the Subscription Size is shown kW_{AC}. There system also contains an apparent limit on the ratio of Estimated Gross Annual Electricity Production (kWh) to Subscription Size (kW). There may be a good reason for putting a limit on this ratio, but unfortunately the limit is too low



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to accurately reflect the rated capacity of modules on the market and/or certain high-efficiency system design characteristics.

Please let me know if you have any questions or would like more information on any of these suggested improvements.

Sincerely,

s/ Ross Abbey

Ross Abbey

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