



October 23, 2018

InClime
Illinois Adjustable Block Program
Program Administrator

Dear Sirs and Madams,

Certasun is a residential solar dealer-installer headquartered in Buffalo Grove, Illinois. We are grateful for the work the Illinois Power Agency and InClime (the "Administrator") are doing to launch the Adjustable Block Program, encourage the adoption of distribution generation, and protect consumers.

Certasun has adopted our [No Surprises Guarantee](#) because we are also committed to honestly explaining residential solar to homeowners. In interacting with them every day, we have learned a lot about what consumers find confusing.

In response to your request for comments on the *Draft Guidelines for Marketing Material and Marketing Behavior*, Certasun believes the majority of the draft guidelines are wise and useful and will encourage the development of a healthy market in Illinois. However, we believe a handful of the draft guidelines below could benefit from additional clarification or revision:

Guideline #7 requires the system "be designed" before the customer signs a contract. This requirement is vague. A design could mean a solar production estimate or a permit-ready set of construction drawings. Before a contract is signed it is appropriate to have a production estimate, but not construction drawings. To require construction drawings would drive up costs unnecessarily (and put Illinois out-of-sync with other markets). For clarity, we suggest guideline #7 be rephrased as follows:

"An Approved Vendor will produce a good-faith solar production estimate, taking into account the system's azimuth, orientation, and shading, and benefiting from a site visit by a representative of the Approved Vendor, before the customer signs a contract."

Guideline #8d also lacks clarity about the definition of "system design". We suggest rephrasing it as follows:

"Disclosure form completed based on the installer or Approved Vendor's good-faith estimate of solar production. Approved Vendor agent shall review the disclosure form with the customer before the customer signs it and give the customer opportunity to ask questions about it."

Guideline #9b restricts the time of in-person solicitation. Certasun suggests clarifying that "solicitation" does not include pre-arranged sales consultations or meetings. Many customers request meetings outside of the hours listed in the draft guideline.

Guideline #13b states that Approved Vendors shall not "make a record of a customer's account number until a contract has been signed." First, please clarify if this is referring to a customer's utility account number. Second, it is common for consumers to share copies of their utility bills with solar companies so that the solar company can design systems appropriate for each home, given its historical energy



consumption. These bills usually contain utility account numbers. We request that this guideline clarify that so long as no effort is made to otherwise record or make a database of consumer account numbers, merely collecting a bill for the purpose described above shall not be a violation of the guideline.

Guideline #15a requires that if any “sales solicitation, agreement, contract, or verification is translated into another language” then all documents must be provided to the customer in that language. We applaud the desire to prevent abuse of customers whose first language is not English; however, requiring ALL documents be in the language in question will be costly and may prevent vendors from producing ANY documents in a language other than English. We respectfully submit that the prohibitions on unfair, deceptive, and abusive acts or practices in Guideline #4 are sufficient.

Sincerely,

A handwritten signature in blue ink, appearing to read "Josh Lutton". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Josh Lutton
President, Certasun LLC