

Geronimo Energy Comments on IPA draft marketing guidelines/brochure

10-25-18

Overall comment: Geronimo would like the IPA to make it known that these guidelines are for residential customers only and *not* commercial customers. Residential and commercial sales cycles are very different, and as such, should not have the same guidelines/requirements. Typically, a commercial sales cycle is much longer in length and takes considerably more time, meetings and involvement from stakeholders on both the buyer's and the seller's sides. Strenuous requirements/guidelines such as those described by the IPA would be unnecessarily burdensome on commercial sales cycles and customers.

#1

Guideline Reference: The IPA guidelines require Approved Vendors to provide a copy (hard copy and/or digital) of the IPA brochure to customers in addition to the Approved Vendors' marketing materials multiple times throughout the sales process.

Concern:

1. The responsibility of ensuring that the IPA brochure is the most current version of the IPA brochure should not fall on Approved Vendors.
2. Not only is providing the brochure multiple times repetitive and burdensome, but it also waters down the importance of the content within the brochure and may end up being ignored by the customer.
3. For companies who operate primarily online (such as some ARES or similar groups) and/or purchase energy in bulk on behalf customers, this becomes an impossible task.
4. Further, providing additional literature in print will greatly increase print and postage costs for Approved Vendors.

Suggested Edit: We suggest the IPA provide their brochure on a publicly available webpage, and instead of providing digital documents or hard copies of the brochure, Approved Vendors may instead provide the link to the IPA brochure on all marketing literature (both print and digital). This would ensure that customers are always viewing the latest version of the IPA brochure and would appropriately place responsibility on the IPA for maintaining the most current version of its brochure for both Approved Vendors and customers to view. Additionally, providing a link on both digital and printed marketing literature would ensure that the IPA brochure is constantly available to the customer to review, thereby negating the need for multiple presentations of the same document. The same suggested edit applies to Section 12a, in which the IPA asks for the brochure to be embedded on a website. It is preferable to simply link back out to an IPA-managed URL in order to ensure we provide the most current version of the brochure and up to date information about the program.

#2

Guideline Reference: On page 3 of the IPA guidelines, in section 3a, the IPA provides language regarding the relationship between the Approved Vendor and the IPA and other organizations.

Concern: While we agree with the intent of this section, the call to action is not clear and needs to be made so.

Suggested Edit: In other states/community solar programs, program owners/operators have provided exact wording that must be included on all marketing literature, including parameters regarding the statement's font size, type and color. We suggest the IPA take the same action and create a 1-2 sentence statement that clearly outlines the relationship (or lack thereof) between the IPA and the Approved Vendor that Approved Vendors can simply copy-paste onto their marketing literature and as such, would be in compliance with this guideline. An example statement might be: "[Company Name] is not employed by, representing, endorsed by, or acting on behalf of a utility or a utility program, a consumer group or consumer group program, or a governmental body, except in those cases where the Approved Vendor is a consumer group or governmental body."

#3

Guideline Reference: On page 3 of the IPA guidelines, in section 3biii, the IPA states: "An Approved Vendor shall not use the name, or any other identifying insignia, graphics or wording that has been used at any time to represent a public utility company, the ICC, or the IPA, or their services, to identify, label or define any of its offers."

Concern: While we understand the intent of this statement, the statement as written would prohibit Approved Vendors from referencing and even naming the program in which these projects will participate. Further, there isn't clarity regarding if an Approved Vendor may link back or refer to the IPA's, ICC's, or utility's website, which could offer customers additional clarity regarding what the program is, who is operating it and how the program works. Additionally, just due to the nature of the program and subsequent eligibility, Approved Vendors will need to reference utility names to make it clear as to what customers are eligible to participate in the program.

Suggested Edit: We suggest limiting this statement to the restricted use of IPA, ICC or utility logos. We understand that corporate logos cannot/should not be used by outside parties, but to not allow Approved Vendors to even name the IPA, the ICC or the utilities would mean we aren't able to fully describe what we are doing, and we fear it will appear disingenuous to customers. Approved Vendors should be allowed (and encouraged) to state that the projects they are developing are a part of the IPA's ABP and explain how that program works. This guideline would prohibit that and should be struck.

#4

Guideline Reference: Section 8D requires that a disclosure form be completed after site visit and system design.

Concern: In the case of a customer subscribing to multiple projects, signing for EACH project will become redundant and burdensome on the customer.

Suggested Edit: Geronimo suggests editing this disclosure so that it covers all projects in the program, not a disclosure per project.

#5

Guideline Reference: Customer shall not be required to sign up for a specific Alternative Retail Electric Supplier as part of their solar contract.

Concern: How would this be interpreted if a developer partners with an ARES?

Suggested Edit: Geronimo suggests that consideration should be made for developers who elect to partner with ARES to promote a portion or the entirety of their solar portfolio to customers. If a developer/Approved Vendor elects to only offer its project(s) through an ARES, that should be permitted and is a risk borne of the Approved Vendor and not of the customer.