

Comments from SolAmerica Energy

Marketing Guidelines

10/25/18

SolAmerica Energy appreciates the opportunity to comment on the IPA's/InClimate's proposed marketing guidelines. Our comments are posted below. Please also refer to SolAmerica's prior comments to the Approved Vendor requirements regarding waiving the requirement to have IPA review and approve in advance all Approved Vendor marketing materials for larger-scale DG (behind-the-meter) customers.

Overall, marketing protocols should be significantly less burdensome and prescriptive for efforts related to large, non-residential customers (with a suggested dividing line of 250 kW-AC and above).

While larger non-residential customers may not always be sophisticated about solar during initial conversations, they tend to be extremely cautious in their decision-making, engaging numerous organizational functions, which can include finance, legal, engineering, sustainability/EHS, and more. C&I customers invariably demand a real education. While they may not "even know what an SREC is" at the beginning of the process, as suggested on the webinar, they certainly do by the time they'd be expected to sign a contract. Success with larger, non-residential customers requires a very high degree of industry and programmatic competence. Sales efforts are almost invariably internal and relatively concentrated to a small number of employees compared to residential sales. Risks presented by ill-informed or bad actors are, therefore, very low.

Specifically:

- 1. Terms and values used the in the Disclosure Form should not govern terms and values used in a company's marketing materials to larger, non-residential customers to the extent that terms and values in the Disclosure Form are overly generic.**

An accurate savings analysis for a larger non-residential customer often involves a deep and sophisticated vetting of that larger, non-residential customer's specific rate structure and usage profile. It is unreasonable to think that a generic substitute for this exercise would be more accurate and therefore more informative to the customer than the exercise itself.

- 2. Formal training should not be required for employees of an Approved Vendor selling to larger, non-residential customers.**

It is unclear whether the Guidelines require employees or just external “agents” to complete training. Any required training should only apply to external agents. The Approved Vendor process itself should suffice as far as vetting the required level of sophistication of an organization and its employees.

- 3. A larger, non-residential customer should not have to attest to the IPA that the brochure was received.**

Attestation by the Approved Vendor should suffice.

- 4. Identification of salespeople by badge or ID need not apply to large, non-residential customers.**

There is no risk that a C&I/larger customer will not know that they are in the presence of a salesperson from a solar company.

- 5. The requirement for providing the informational brochure to the customer at first contact should be waived in the case of C&I customers who are contacted prior to the release of the informational brochure.**