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## RE: Comments on the Adjustable Block Program Marketing Guidelines and Disclosure Form

Thank you for the opportunity to provide comments on the Adjustable Block Program Marketing Guidelines and Disclosure Form for community solar. Advanced Energy Economy (AEE) supports a process for the Illinois Power Agency (IPA) to approve modifications to the disclosure form while ensuring that customers still receive the appropriate information about their community solar project subscription.

AEE is a 501(c)(6) national association of businesses, representing leaders in the advanced energy industry. AEE is dedicated to transforming public policy to enable a prosperous world that runs on clean, secure, and affordable energy. AEE comprises more than 100 companies across the technology spectrum, including energy efficiency, solar, wind, storage, electric vehicles, demand response, advanced metering, and enabling software.

Our objective is to have a large number of Illinois consumers enrolled in community solar projects, and for those consumers to understand exactly what community solar means for them. We believe we share this goal with the IPA, as well as many other interested stakeholders.

In our work across the country, we have observed that community solar is often the only way for many residential customers to take advantage of low-cost clean energy. This is particularly true for customers who rent their home, who live in multifamily housing, or who can't obtain financing for a rooftop solar installation. We have also seen that policymakers across the country want to apply lessons learned from other markets - particularly the competitive retail energy market - to community solar. This is especially true when it comes to consumer protection. Every state with third-party community solar programs has adopted some sort of consumer protection regime.

The rules for the Adjustable Block Program go beyond most other states' practices by prescribing specific processes for customers to both receive and acknowledge receipt of certain materials. The Adjustable Block Program is also the only community solar program we're aware of that does not allow the program administrator to approve modifications to customer disclosure forms or processes that are designed to protect customers. Unfortunately, the rigid processes in Illinois are actively working against our shared objective of enrolling a large number of consumers in community solar, and they are leading to weaker customer understanding of the program than modified processes could.

There is a simple solution. The IPA should adopt the best practice from other community solar states and allow market participants to propose modified forms and processes for official

approval. As long as the proposed modifications will lead to equivalent (or superior) consumer protection, the IPA should then approve the modifications.

Our recommendation is that the final revised version of the Community Solar Marketing Guidelines include a new paragraph 7.e. in the “Guidelines for Marketing Behavior” section. This new paragraph would read:

Approved Vendors and their subcontractors may propose modifications to the processes described in this section. Such proposals should include a written description of the modified process as well as supporting documentation. The IPA can request further information or a meeting to discuss the proposal, which may lead to changes in the proposal. If the proposed modifications achieve substantially the same outcome as the process described in this section, the IPA will approve the proposal.

This is a common-sense improvement to the program rules that will lead to better outcomes for customers.

The IPA has also asked for feedback on a number of other issues, and we wanted to share two concise thoughts from our members. First, the disclosure form should allow for schedules of projects and approved vendors. This reflects the reality of how the program is being marketed to customers. Second, our members feel strongly that the IPA should accept alternative forms of execution to acknowledge receipt of the disclosure form, but that the IPA should not try to imagine every possible alternative in the program guidelines. Our recommendation above on allowing proposals for modified processes is intended to address this concern.

We are excited to see the Illinois community solar market grow quickly. Thank you for your openness to improvements in the market that will enable faster growth.

Sincerely,

J.R. Tolbert  
Managing Director