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Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, IL 60602

To Whom It May Concern:

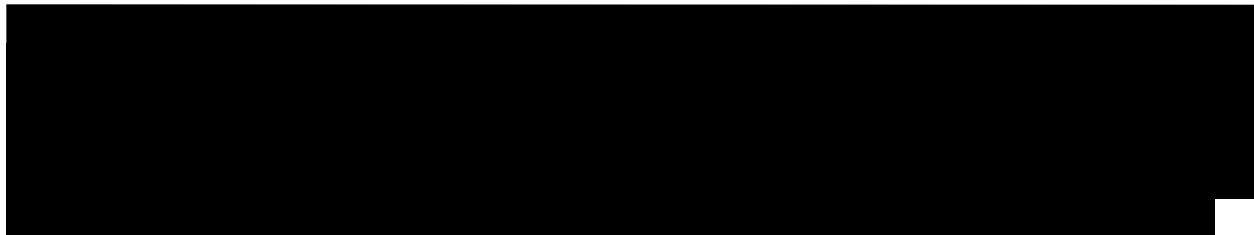
Clearway Energy Group LLC (“Clearway”) submits the following clarification to the Illinois Power Agency’s (“IPA”) request for comments and feedback on the Marketing Guidelines and Disclosure Form for community solar projects in the Adjustable Block Program. Please find confidential information highlighted in yellow that Clearway requests be protected from public disclosure.

COMMUNITY SOLAR DISCLOSURE FORM FEEDBACK

2) Currently, a disclosure form must identify the specific Approved Vendor connected to the subscription. It appears, however, that many Approved Vendors may instead be relying on third-party customer acquisition firms. The IPA is thus considering allowing for the inclusion of a schedule of potential Approved Vendors on the disclosure form to allow for downstream assignment of a customer to an individual Approved Vendor.

a. Should a schedule of Approved Vendors be allowed in lieu of requiring a specific Approved Vendor? If not, why?

Yes, a schedule of Approved Vendors or the ability use “TBD” in the Approved Vendor field on the disclosure form should be allowed to improve the customer experience when addressing potential project changes. Allowing a schedule of potential projects and a schedule of Approved Vendors are intertwined because most times each project has its own Approved Vendor. A change to the project name would likely result in a changed to the Approved Vendor as well.



b. If a schedule of possible Approved Vendors were to be permitted, what requirements should be put into place to ensure that the customer is notified of the specific Approved Vendor eventually associated with the subscription?

Customers should be informed in writing via email or mail of the assigned Approved Vendor and project without the need for a new disclosure form to be executed by the customer when the Approved Vendors



are affiliates. The assigned Approved Vendor or its designee would send a “Hello” letter informing the customer of its assigned project and Approved Vendor prior to energization. The Program Administrator currently tracks self-identified affiliated Approved Vendors.



c. Should a new disclosure form be required if that subscriber was moved between Approved Vendors? What other procedural requirements should apply if a customer’s subscription is reassigned between Approved Vendors?

Moving customers between Approved Vendors as result of a project change should not require a new disclosure form so long as no other material terms of the disclosure form change.

d. What other concerns should the IPA be aware of in this vein?

Adding too many variables to the disclosure form might distract from the firm community solar terms that are being conveyed to the customer at point-of-sale. We suggest that the IPA consider using “TBD” for the Approved Vendor field in the disclosure form so customers understand that they will be assigned to a project and Approved Vendor at a later date closer to the time when the project will energize.

Again, Clearway appreciates the IPA posing these questions and seeking stakeholder feedback to increase program efficiency and ensure consumer protection.

Sincerely,
Clearway Energy Group LLC