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Adjustable Block Program
Request for Stakeholder Feedback – Marketing Guidelines
April 28, 2020

Dear Mr. Anthony Star and the Illinois Power Agency:

SRECTrade, Inc. (“SRECTrade”) appreciates the opportunity to provide feedback on the Draft Marketing Materials and Marketing Behavior Guidelines (“the Guidelines”). SRECTrade provides our comments on specified “Questions on the Draft Marketing Guidelines” from the Request for Stakeholder Feedback below.

2. SRECTrade comments that the majority of the disciplinary process is outlined adequately, however notes two sections which could use greater clarification.

First, the added item 9.b. is a requirement “...for all outgoing marketing or solicitation calls.” Section 9.b. appears to be written in similar nature as Section 9.a., which addresses telemarketing specifically “...for the purpose of selling or leasing PV systems.” SRECTrade believes that similar clarification should be added to Section 9.b. that the call log requirement is for “...for all outgoing marketing or solicitation calls [for the purpose of selling or leasing PV systems].”

Second, the added item 16.c. should clarify the timeline that Approved Vendors will have to provide a complete list of agent names and ID numbers upon request, instead of saying “promptly”, as many other similar requirements throughout the Guidelines clarify a timeline or deadline that must be followed. Due to the large number of salespeople across a variety of Designees that some Approved Vendors work with and since Approved Vendors are reliant on their Designees for help maintaining these records, SRECTrade proposes a timeline of five business days to comply with this request which should provide Approved Vendors with sufficient time to review and organize their records with their Designees.

5. SRECTrade comments on other specific revisions to the Guidelines that the IPA should consider below:

Section 4.c.

SRECTrade comments that testimonials should not be required to include a disclaimer that user experience may differ. SRECTrade believes that this reality is already implicit in testimonials and that consumers generally assume that their experience could differ from others. Testimonials stating the following, for example, are not required in many other programs:

“My solar company (X) was the best!” (Your experience may differ).

Section 12.a.

Regarding Section 12.a.iv., SRECTrade comments that Approved Vendors should only be required to conduct refresher training on the Guidelines with individual representatives if there are changes made to the Guidelines. An initial training with each representative and the representative’s frequent exposure



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to the Guidelines through their line of work on their own should be sufficient in maintaining an understanding of them. SRECTrade also comments that due to the increased and more-outlined disciplinary actions which could be taken as a result of violating the Guidelines, these increased regulations facilitate the same goal as increasing training frequency does.

Lastly, regarding Section 12.a.vi., SRECTrade comments that Approved Vendors should be provided with standardized training materials for its own employees and those of its Designees for the same reasons that regulating the content and distribution of marketing materials is done to protect consumers. It is clear from the Guidelines that the IPA's goal is to clearly outline the process by which Approved Vendors and Designees are trained on the Guidelines, and standardizing training materials should help achieve this goal as well from the top-down. This would also eliminate the need for Sections 12.a.i. and 12.a.ii.

Thank you for your time and consideration on SRECTrade's comments and please contact us with any questions.

Sincerely,

SRECTrade, Inc.