

The Joint Solar Parties, generally speaking, do not wish to raise objections to the proposed changes to the behind-the-meter or community solar marketing guidelines, with the exception of the following:

- Section 4.b.ii.2 (Community Solar only)
 - The Joint Solar Parties oppose ComEd using its logo in conjunction with lead generation services for participating Approved Vendors, including of the type proposed by ComEd in ICC Docket No. 19-1121. If ComEd is acting as a lead generator, it should be treated as any other lead generator that is prohibited from using the utility logo. The Joint Solar Parties do not object to ComEd including its logo on a webpage that includes contact information for all (at least all interested) community solar facilities.
 - Should ComEd and/or Ameren receive ICC approval to provide lead generation and or marketing services, the Joint Solar Parties further encourage the IPA to impose the same obligations and restrictions on ComEd or Ameren as would be imposed on any other lead generator or marketing agent.
- Sections 18.c (Behind-the-Meter) and 19.c (Community Solar)
 - In order to avoid ambiguity, the Joint Solar Parties request the following revision:
 - Approved Vendors may also be subject to conditional approval, or denial of status as Approved Vendors, upon the demonstration of ~~a pattern of negative customer experiences~~ or ongoing misrepresentations to customers (whether in Illinois or other jurisdictions) or violations of these requirements.
 - Joint Solar Parties believes that any negative customer experiences justifying disciplinary action would generally fall under the broad categories of either “ongoing misrepresentations” or “violations of these requirements;” thus the revision maintains the intent of the clause without introducing unnecessary ambiguity.
- Section 12.a (Behind-the-Meter) and Section 12.a (Community Solar)
 - If Approved Vendors are affiliated, then only one of the affiliated Approved Vendors should have to conduct training (in the name of all affiliates). It would make little sense for a single long-term owner with—for instance—five separate single-project Approved Vendors to have each Approved Vendor separately train each member of the long-term owner’s sales force.
 - The Joint Solar Parties recommend annual training rather than every six months for sales agents. However, if the six month “refresher” requirement is maintained, IPA should provide accommodation to Approved Vendors for whom this requirement is past due. Also, the marketing guidelines for both types of systems should be clarified that the enhanced agent training requirements are only for agents participating in residential in-person and telemarketing solicitation (as opposed to any customer with a 25 kW or below system or subscription).
 - The Joint Solar Parties encourage the IPA to produce standard model training materials as guidance. However, Approved Vendors and agents should not be prohibited from customizing required content and integrating it into their own training materials, subject to 12.a.i and 12.a.ii.
- Section 11.a (Behind-the-Meter) and Section 11.a (Community Solar)

- The IPA should allow for additional information collection – not just zip code or electric service territory – prior to making the Illinois Shines Informational Brochure available. Other additional information is important to collect prior to showing the brochure in order to ensure a customer has a good chance of qualifying for the program. This information collection is in compliance with existing federal guidelines on consumer data collection which provides for consumer protection. Specifically, information collection authorized prior to showing the brochure, which is for pre-qualification purposes only, should include:

- Name, address, email, phone #, estimated energy bill costs per month
- Roof space, age and type of roof, more specific electrical usage, if they are the homeowner,

Once this information is collected, and the customer is pre-qualified, the customer should be shown the brochure prior to continuation of any additional communication.

Individual companies involved in behind-the-meter and community solar are expected to comment separately in more detail on a range of issues.