



To: Illinois Power Agency  
Adjustable Block Program Guidebook  
Request for Stakeholder Comment  
[admin@illinoisabp.com](mailto:admin@illinoisabp.com)

**RE: Comments of Constellation NewEnergy, Inc. on Adjustable Block Program Guidelines for Distributed Generation Marketing Materials and Marketing Behavior (Marketing Guidelines)**

Constellation NewEnergy, Inc. (Constellation) submits these comments to the Illinois Power Agency and the Program Administrator for the Illinois Adjustable Block Program on the Adjustable Block Program Guidelines for Distributed Generation Marketing Materials and Marketing Behavior (Marketing Guidelines).

Page 59 – Section 7A (under Annual Report Requirements):

“A signed disclosure form is required in order for a given subscriber to count towards a community solar project’s subscriber tally in either an annual or quarterly report. If the AC size of a community solar subscription submitted to the Program Administrator differs by more than the greater of 1kW or 5% from the subscription size noted in that subscriber’s corresponding disclosure form, a new disclosure form will be required.”

Comment: Constellation believes that the requirement for a new disclosure form will be burdensome on Approved Vendors and their agents and could discourage Approved Vendors and their agents from right-sizing subscription allocations, or worse, discourage customers from completing subscription enrollments. In many cases, when an Approved Vendor or its agent signs up a subscriber, the initial subscription allocation is based on an estimate. In those instances the Approved Vendor provides that estimate on the disclosure form without knowing the actual usage of that subscriber. It is not until a customer is enrolled in the Program and the actual customer usage is known that the actual allocation is determined. The Approved Vendor needs to have the actual usage to match the subscription size to the load. Based on these circumstances the current draft of the Marketing Guidelines, the greater of 1kW or 5% subscription variance, would require most customers to re-execute a disclosure form. One of the goals of the Illinois Shines program is to provide customers savings on their electricity bills by giving them easy access renewable energy credits. Approaching a single customer on multiple occasions prior to enrollment into the Program would create the unintended consequence of making it more difficult to enroll customers. Constellation would prefer to amend the draft guidelines with the following:

**“A signed disclosure form is required in order for a given subscriber to count towards a community solar project’s subscriber tally in either an annual or quarterly report. In instances where the community solar subscription includes (1) an upfront or structured series of pre-determined payments; or (2) includes a fee for early termination; and in either case the AC size of a community solar subscription submitted to the Program Administrator differs by more than the greater of 1kW or**



**5% from the subscription size noted in that subscriber's corresponding disclosure form, a new disclosure form will be required; In instances where neither of the conditions under (1) and (2) above exist, then no new disclosure form will be required where the AC size of a community solar subscription submitted to the Program Administrator differs from the subscriber's corresponding disclosure form so long as the subscription remains within the limits of the Program."**

Constellation believes this change will allow for an easier enrollment process and give greater access to Illinois customers without sacrificing the protections that the original language promoted.

We thank you for your consideration. Please feel free to reach out to us with any questions.

Respectfully submitted,

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