

# REC Prices and Draft Contracts, Application Prioritization, and Expiration of Disclosure Form Timing Exception

August 5, 2022

## Program News

- **Publication of REC Prices Pursuant to the Approval of the 2022 Long-Term Plan**

On July 14, 2022, the Illinois Commerce Commission approved the Illinois Power Agency's 2022 Long-Term Renewable Resources Procurement Plan. The Final 2022 Plan will be published by the Agency on its website in accordance with the [Commission's Order](#) within 60 days, or by September 12, 2022. Due to the scheduled reopening of the Adjustable Block Program on September 1, 2022, the Agency committed to publishing updated REC Prices consistent with the Commission's Final Order by August 1, 2022. The [REC Pricing Model](#) has accordingly been updated to reflect the modifications approved by the Commission, including adjustments to certain inputs in the model for the Adjustable Block Program. In addition, REC Prices by program will also be published in the next iterations of the Adjustable Block Program Guidebook. The REC prices reflected within the REC Pricing Model are applicable for the 2022-2023 Program Year, from September 1, 2022 through May 31, 2023, or any project that was submitted between December 14, 2021 and June 30, 2022, which was placed on a waitlist.

- **Approved Long-Term Renewable Resources Procurement Plan, including Consumer Protection Handbook and Contract Requirements**

In conjunction with the Illinois Commerce Commission's approval of the IPA's 2022 Long-Term Plan, the Commission also approved consumer protection documents filed with the Plan, with minor modifications. The IPA has updated the Consumer Protection Handbook and Contract Requirements consistent with the Commission's Order and **AVs/Designees must be in full compliance with new requirements in these documents by August 28, 2022.** Please carefully review these important documents:

- 1) [Cover Letter – Consumer Protection Handbook and Contract Requirements;](#)
- 2) [Consumer Protection Handbook;](#)
- 3) [ABP Contract Requirements – Distributed Generation;](#)
- 4) [ABP Contract Requirements – Community Solar](#)

**PLEASE NOTE** – The Consumer Protection Handbook replaces both the Distributed Generation and Community Solar Marketing Guidelines documents. The Marketing Guidelines documents are now out-of-date. More information on this can be found in the cover letter linked above.

The Consumer Protection Handbook includes several new requirements and clarified requirements, including but not limited to:

- Explanations of what would make an act or practice unfair or abusive
- A requirement that Approved Vendors and Designees be responsive to customer questions and concerns and respond as promptly as possible, but no later than within seven business days
- Requirements regarding compliance with contractual obligations, conducting business in a professional manner, and providing services in a workmanlike manner
- Requirements regarding cooperation with investigations and truthfulness to the Program Administrator and IPA
- Required disclosures for all marketing channels
- Required disclosures and record retention requirements for telemarketing

- Requirement that the relevant utility account holder must be the signatory on the Disclosure Form (or, if the account holder is a company or organization, an individual authorized to sign on behalf of the account holder)
- Requirements regarding the use of third-party commercially available e-signature platforms
- Requirements regarding how Disclosure Forms should be completed

- **Application Prioritization**

The Agency has determined that the review of applications received prior to portal closure will be prioritized by type as outlined below. Prior to the transition of Program Administrators, project applications have been reviewed in the order that they were received. This new prioritization is temporary and is designed to successfully manage a high volume of applications that affect large numbers of customers (community solar) and applications for customers who will most directly benefit from quicker application processing (residential customers who are anticipating payment for the RECs that will be generated by their systems). This prioritization strategy will only be used until Program opening on September 1, 2022, when the Program Administrator will resume reviewing applications in the order that they are received.

The planned prioritization is as follows: 1) Community solar projects (both Part I and Part II); 2) Part I Small DG for purchased systems; 3) Resolution of Need Info requests; 4) Part II Small DG for purchased systems; 5) Part I Large DG for purchased systems; 6) Part II Large DG for purchased systems; 7) Part I Small DG for leased and PPA systems; 8) Part II Small DG for leased and PPA systems; 9) Part I Large DG for leased and PPA systems; and 10) Part II Large DG for leased and PPA systems.

- **REC Contract Updates**

On August 3, 2022, the Agency posted drafts of the REC Contracts revised in light of the ICC approval of the 2022 Long-Term Plan (August 2022 Draft REC Contracts), which are available at <https://illinoisabp.com/rec-contract/>. This [Request for Stakeholder Comments](#) is to seek feedback on the August 2022 Draft REC Contracts.

**Written Comments are due by 5:00 PM Central Prevailing Time (“CPT”) on August 15, 2022 and should be sent to: [IPA.Solar@illinois.gov](mailto:IPA.Solar@illinois.gov)**

The Agency plans to finalize and publish the contracts prior to the opening of additional capacity under the Adjustable Block Program on September 1, 2022. All comments/proposed edits received in accordance with the process outlined will be reviewed by representatives from the IPA, the Program Administrator (Energy Solutions), Ameren Illinois Company, Commonwealth Edison Company, MidAmerican Energy Company, Staff of the Illinois Commerce Commission, and NERA Economic Consulting.

- **Project Application Reports Now Live**

Project Application Reports, current as of 6/30/2022, have been restored and can be found on the [Project Application Reports page](#) on the ABP website. The reports, including *Project Applications Received (Report #1)*, *ICC-Approved Part I Applications (Report #2)*, and *Part II of Project Application Complete (Report #3)*, are available as downloadable spreadsheets.

We thank AVs and Designees for continuing to collaborate and share questions and feedback that are helping to optimize our support, software development, and more. Thank you for your continued commitment to strengthening and supporting the Adjustable Block Program.

## Transition Updates

- **Limited Exceptions on Disclosure Form Timing and Compliance Requirements – DEADLINE TODAY**  
As previously shared, the Program is allowing a **limited exception** from the requirement that customers review and sign Disclosure Forms prior to executing their installation or subscription contract, in consideration of temporary Portal unavailability during the transition period. This exception will **only apply** for contracts that were signed by the customer on June 30 through **August 5, 2022**, and all impacted customers must still subsequently receive and sign a Disclosure Form. **On August 6, 2022, the requirement that customers review and sign Disclosure Forms before the contract is signed will apply again in full.** As a reminder, if your company has new customers who signed a contract between June 30 through August 5 and who did not sign a Disclosure Form prior to contract execution, **you must follow the below steps to qualify for this exception:**
  - By **August 19, 2022**, provide to the Program Administrator **EITHER** 1) a list of the affected customers (customer name and contract execution date) **OR** 2) copies of the executed contracts, which must include the customer name and execution date. These documents should be shared via an Approved Vendor's secure SharePoint and organized by Designee (if Designees were being used to conduct sales).
  - Provide completed Disclosure Forms for the affected customers within 3 weeks of the customers' contract execution date.
  - Submit the signed Disclosure Forms for the affected customers to the Portal within 6 weeks of the customers' contract execution date.
- **Community Solar Subscriber Management Process**  
The AV Informational Webinar on July 6, 2022 discussed a SharePoint-based process for subscriber management, including the creation of a workbook for each Approved Vendor, allowing for the input of subscribers from the legacy Portal, as well as any unassigned disclosure forms. This process, which will allow AVs and Designees to create subscribers based on Disclosure Forms and for the Program Administrator to input Disclosure Forms from the Portal or via temporary CSV option, is forthcoming, with more information available soon. You can [view a recording](#) and the [presentation slides](#) from the July 6 webinar.

**REMINDER:** During the Program Administrator transition, the IPA has placed a temporary pause on all new ABP project application submissions between July 1, 2022 through September 1, 2022. New Approved Vendor applications will be accepted again beginning on September 1, 2022. All transition updates can be found on the [ABP Transition Hub webpage](#).

**CONTACT US:** For Portal, application, or Program-specific questions and inquiries, please contact [admin@illinoisabp.com](mailto:admin@illinoisabp.com) or call 877-783-1820.

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## Requirements and Reminders

- **August Invoicing**  
August invoicing is supported via email and SharePoint, outside of the Portal, with Energy Solutions generating invoices and quarterly netting statements upon request by Approved Vendors. On August 1, 2022, Energy Solutions emailed Approved Vendors with projects eligible for invoicing in August. Approved Vendors will need to respond to that email, and have until **August 10, 2022** to request invoicing documents. Energy Solutions will provide the invoicing documents by SharePoint, for AVs to submit to utilities via the usual process.