

## **US Solar – Feedback re LTP Chapter 9 (Consumer Protection)**

Dear IPA,

US Solar respectfully submits this feedback regarding the IPA's May 26, 2023, request for stakeholder feedback on the 2024 IPA Long-Term Plan. As an active developer of distributed generation and community solar projects under the Illinois Shines program, we based these comments on our experience in Illinois and several other states.

### **Chapter 9: Consumer Protection**

#### **Topic 8. Approval Process for IL Shines Designees**

One aspect of the Illinois Shines program that is unique to the state of Illinois is the level of administrative compliance requirements necessary for participation. We would like to point out the increased administrative burden that would result from requiring explicit pre-approval for each and every Designee operating under the program today and in the future. This would only exacerbate existing workload concerns for the Agency and the administrator, which is already far behind in processing project applications. New requirements would also impose additional burdens, for example timeline delays, on new Designees. The Illinois Shines program already has robust consumer protection measures in place, so creating an additional barrier for designees to participate could result in less participation and increased administrative workload, without actually benefiting consumer protection.

By all appearances, the current process that requires Approved Vendors to oversee their Designees appears to be working. While as the notice points out there are more complaints made against Designees than against Approved Vendors, this is likely an artifact of the business models which see Designees often performing customer-facing roles like sales and marketing. Given the typical role of Designees in the program, it is not surprising that they receive relatively more customer complaints.

In situations where a complaint is filed against a Designee, the relevant Approved Vendor should of course be notified, both for their awareness and so they can direct their Designee to address any concerns. The new requirement for Approved Vendors to have and follow a Designee Management Plan beginning September 1, 2023, is another step in ensuring Designees are following all program requirements and requires Approved Vendors to vet new Designees themselves. To require additional work from the already overburdened program administrator that is already being done by the individual Approved Vendors would put an unnecessary strain on program resources without meaningfully contributing to consumer protection.

Thank you for your consideration in this matter.