



June 29, 2023

**Re: Stakeholder Feedback Request for the 2024 IPA Long-Term Plan**

Solstice Power Technologies  
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Solstice Power Technologies appreciates the opportunity to provide comments to the Illinois Power Agency regarding the Long-Term Plan for 2024.

**ADDITIONAL TOPIC: Illinois Solar for All Waitlist**

**SOLSTICE RESPONSE:** As an additional topic, beyond those that the Illinois Power Authority specifically requested feedback on, Solstice would like to raise an issue with the new language in the Illinois Solar for All Approved Vendor Manual for Program Year 6. Solstice notes that these same comments were submitted in the Vendor Manual feedback process, but the proposed changes were not implemented.

The new language states that vendors may maintain a waitlist of interested customers but cannot collect payment methods or signed contracts for customers who are placed on the waitlist. Only until there is space available can vendors collect this information. This language makes the Daily Average target (100% of subscriptions) impossible to maintain since it will take several days or even weeks for a customer to provide payment information, sign a contract, and be fully verified. If subscription managers cannot maintain a waitlist of customers who are ready to be allocated immediately, there will always be a delay between a project subscription shortfall and fully enrolling a replacement customer.

Solstice appreciates the Program Administrator's consideration, but reiterates particular concern about this issue because, as suggested in Topic 8, the Daily Average REC reporting requirements may only be adjusted for future projects, even though that would create an extreme disadvantage for existing projects. In that case, the ability to keep contracted customers on the waitlist would be critical to filling churn as quickly as possible.

Consumer protections and transparency are of course extremely important in community solar, and particularly so for low-income households. The Program Administrator, in its response to comments, stated that "Signing contracts while only in a waitlist status limits households' ability to transfer to another project, if one becomes available, which can allow them to start realizing savings sooner." But this is not the case on Solstice projects, which include straightforward termination clauses without any termination fees and do not preclude a customer from signing up on a different project; if that project energizes



before the Solstice project, then that customer will start realizing savings sooner and Solstice moves on to fill that spot. If other subscription managers are including termination fees, then Solstice recommends the Illinois Power Authority and Program Administrator prohibit the use of termination fees, which would protect consumers and easily assuage the concern of contracted customers not being able to switch projects.

If the ultimate goal is to help customers realize their savings sooner, then allowing waitlisted customers to sign contracts is a far better approach. The process of enrolling a customer in the waitlist and signing a contract simultaneously is a much smoother experience than if they have to enroll in a waitlist and then get chased down later on to provide more information and sign contracts. The more touch points required between a vendor and a customer, the more likely they are to drop out of the enrollment process. If they have already signed a contract before joining the waitlist, Solstice can start delivering savings immediately as capacity is available.

Thank you for the opportunity to provide comments on these matters. Please contact Alex Pasanen (Policy Coordinator) at [alex@solstice.us](mailto:alex@solstice.us) if you would like to further discuss these matters.

Sincerely,  
Sandhya Murali  
Solstice Power Technologies