

# **CONSUMER COMPLAINTS & DISCIPLINARY ACTIONS**



**Illinois Power Agency**

**Illinois Shines  
and Illinois Solar for All  
Consumer Complaints &  
Disciplinary Actions  
Annual Report - 2023**

February 29, 2024

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## 1. Introduction

The Illinois Power Agency (“IPA” or “Agency”) committed in its initial Long-Term Renewable Resources Procurement Plan (“Long-Term Plan” or “Plan”) to “provide an annual written report to the [Illinois Commerce] Commission (“the Commission”) documenting the frequency and nature of complaints” related to the Illinois Shines program (the “Program”) and Illinois Solar for All (“ILSFA”), as well as “any enforcement actions taken.”<sup>1</sup> Since October 2019, both Illinois Shines (legislatively known as the “Adjustable Block Program”) and ILSFA allow customers to file complaints via email and telephone, and Illinois Shines also accepts complaints by webform. The Program Administrators track the complaints received and related information, including topic, the company against which the complaint was lodged, and resolution of the complaint.

The first annual complaint report, covering calendar year 2019, was provided to the Commission through a filing in Docket No. 17-0838 on March 2, 2020. The Agency filed subsequent annual reports covering calendar years 2020 and 2021 in Docket No. 19-0995 and 2022 in Docket No. 22-0231. This annual report addresses complaints received during calendar year 2023.

### *Impact of Legislative Efforts and the Passage of the Climate and Equitable Jobs Act*

On September 15, 2021, Governor Pritzker signed Public Act 102-0662 (the Climate and Equitable Jobs Act). This Act includes significant changes to the Illinois Shines and ILSFA programs and provides funding to support both programs for the foreseeable future. With the renewed funding and reopening of Illinois Shines, the Illinois Shines Program Administrator saw a reduction in waitlist complaints from 63 complaints in 2021 down to zero in 2022.

With the passage of Public Act 102-0662, the annual complaints report evolved from an administrative requirement into a statutory requirement. Section 1-75(c)(1)(M)(v) of the IPA Act requires the Agency to provide an annual written report to the Commission documenting the frequency and nature of complaints arising from its programs, as well as any enforcement actions taken in response to those complaints.

Section 9.7 of the 2022 Long-Term Plan reiterates the Agency’s commitment to publication of the annual report and explains that “[the] report is a vital way that the Agency ensures transparency with the public concerning complaints received regarding program participants.”<sup>2</sup>

### *Consumer Protection Updates in 2023*

In 2023, the Agency and Program Administrators made important updates and improvements to consumer protection materials and efforts.

In April 2023, the Agency released updated versions of the Consumer Protection Handbook<sup>3</sup> and the Contract Requirements (for both Illinois Shines and ILSFA) for use in the 2023-24 Program Year commencing on June 1, 2023. Approved Vendors and Designees were given 45 days from publication

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<sup>1</sup> Initial Long-Term Renewable Resources Procurement Plan (August 6, 2018) at 128, available at <https://illinoisabp.com/wp-content/uploads/2020/09/Long-Term-Renewable-Resources-Procurement-Plan-8-6-18.pdf>.

<sup>2</sup> 2022 Long-Term Renewable Resources Procurement Plan (Modified Plan upon Reopening) (May 9, 2023) at 330, available at <https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/modified-2022-long-term-plan-upon-reopening-9-may-2022-final.pdf>.

<sup>3</sup> The Consumer Protection Handbook is available at <https://illinoisshines.com/wp-content/uploads/2023/06/Consumer-Protection-Handbook-Final-4.17.23.pdf>.

to comply with the new requirements. One significant update to the Consumer Protection Handbook is the addition of Designee Management Plan requirements in Section X.B. The Designee Management Plan section sets out requirements for Approved Vendors, who are responsible for managing and actively supervising their Designees (including nested Designees) and ensuring compliance with all Program requirements. Every Approved Vendor that works with or uses Designees is required to have and follow a Designee Management Plan as of September 1, 2023.

Another significant update in the Consumer Protection Handbook is the addition of a Program Violation Response Matrix (the “Matrix”) in Section X.D. The Matrix lays out the various responses that the Program Administrator may take in response to customer complaints and potential and confirmed consumer protection Program violations. The Matrix includes information on when each type of response is used, the process provided, communications around the action, publication, and appeals. The Matrix also includes a non-exhaustive list of factors that the Program Administrator may consider when determining what response is appropriate.

The Agency and Program Administrators also implemented significant revisions to the required Disclosure Forms. These changes helped streamline the Disclosure Forms for all project types and improved the clarity, consistency, and accuracy of the text. The new Disclosure Forms incorporate more dynamic elements, which allow for information that is only relevant for some offers to only appear on the Disclosure Form for those offers where it is relevant, and not be shown when not relevant, allowing for shorter and more useful Disclosure Forms. To support customer education, the Agency developed Disclosure Form supplementary guides that offer details and explanations specific to the type of solar project (distributed generation (“DG”) or community solar (“CS”), financial arrangement (subscription, lease, PPA, purchase), and utility provider. The guides, referred to as Disclosure Form “Deep Dives,” walk through the document, section by section, providing clear information and context to aid customers in understanding their Disclosure Forms. Additionally, there is a glossary of terms provided at the end of each Deep Dive. Each Disclosure Form includes hyperlinks to the Deep Dives.

In accordance with the 2022 Long-Term Plan and Section 1-75(c)(1)(M)(vi) of Illinois Power Agency Act,<sup>4</sup> the Agency and Program Administrators continue to hold monthly Consumer Protection Working Group meetings with Approved Vendors, Designees, consumer protection organizations, consumers, and other interested stakeholders. The purpose of these meetings is to discuss market trends, best practices, consumer education, and consumer protection requirements and enhancements. Some topics covered in 2023 included: process improvements to increase Approved Vendor and Designee assistance with stranded customers;<sup>5</sup> soliciting feedback on situations that should require customers to sign a new Disclosure Form; potential enhancements to improve Disclosure Form functionality and efficiency; suggestions surrounding a future customer satisfaction survey; and the market’s use of e-signature and software systems to obtain customer signatures on Disclosure Forms and other Program related documentation.

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<sup>4</sup> “The Agency shall schedule regular meetings with representatives of the Attorney General, the Illinois Commerce Commission, consumer protection groups, and other interested stakeholders, to share relevant information about consumer protection project compliance, and complaints received.” 20 ILCS 3855/1-75(c)(1)(M)(vi).

<sup>5</sup> “Stranded customers” are Illinois Shines program DG customers whose Approved Vendor and/or Designee has gone out of business, is unable or unwilling to meet Program requirements, or is suspended because of disciplinary action and prohibited from advancing projects through the application process.

As in 2022, participation and interest remained strong in the expanded Consumer Protection Working Group meetings in 2023; stakeholders continue to provide helpful feedback to the Agency and Program Administrators that have resulted in Program improvements.

## 2. Scope of Report

This 2023 Report is the fifth annual Consumer Complaint Report. Previous versions of the Report focused primarily on complaints related to the Illinois Shines program and had limited discussion of the few ILSFA complaints received.<sup>6</sup> To date, there continue to be many fewer complaints related to ILSFA, and they have tended to be less serious in nature. However, with the growth of both Programs and corresponding increase in complaints, and the increased focus on consumer protection in P.A. 102-0662, the Agency decided it would be appropriate to have a separate section in the 2022 Report specifically for ILSFA complaints and trends. This 2023 Report is also organized with a separate section for ILSFA.

The scope of this 2023 Report includes complaints received by the Program Administrators of both Illinois Shines and ILSFA from January 1, 2023, to December 31, 2023, and provides summarized data on these complaints. For Illinois Shines complaints, the report includes a narrative summary of a sampling of complaints in each of the five major complaint categories. These top complaint categories represent approximately 90% of all the complaints received. The sample complaints were selected based on how well they exemplified the category of complaint under which they fall. The Illinois Solar for All section includes a chart of each complaint received in 2023, the status, Approved Vendor, complaint subject, program type, and date opened and closed or resolved.

In addition to the summary of complaints received, this report includes a summary of suspensions issued by the Program Administrators against Approved Vendors or Designees. In calendar year 2023, the Program Administrator suspended 39 entities. Three suspensions were overturned on appeal by the Agency. Nine of the suspensions related to issues first brought to the Program Administrator's attention through consumer complaints. The Program Administrator for ILSFA did not initiate any suspensions of any entities from ILSFA. However, suspensions in Illinois Shines are automatically applied to participation in ILSFA as well, and the ILSFA Program Administrator did therefore apply suspensions to entities suspended by the Illinois Shines Program Administrator.

The IPA strives to constantly improve and adjust Program operations to advance consumer protections, including utilizing this complaint information, which may result in changes to the content or presentation of the annual Consumer Complaints Report in future years.

## 3. Complaint and Disciplinary Action Process

### How Complaints Are Received

When considering solar offers that are part of Illinois Shines and ILSFA, consumers receive materials—specifically, the Program informational brochure and Disclosure Form—that provide information on how a complaint may be submitted. When a customer wishes to lodge a complaint,

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<sup>6</sup> Prior years' reports are available at <https://illinoisshines.com/annual-complaints-reports-3/>.<sup>7</sup> For example, complaints outside the scope of the Illinois Shines program could include complaints against Program-registered companies but for systems that are not intended to be applied to the Program (e.g., systems outside of Illinois).

they have multiple options available to them. In some cases, complaints are first submitted to the Agency rather than to the Program Administrator. In other cases, complaints may be received by another entity (e.g., a solar company, the Office of the Attorney General, Citizens Utility Board, the Illinois Commerce Commission, local or municipal officials, or a state legislator); this report covers only those complaints received by the Program Administrator, whether directly or through referral from another entity. Consequently, the number of complaints received by the Programs may not reflect the totality of consumer complaints related to Illinois Shines or ILSFA. The IPA encourages any entities that receive a complaint regarding Illinois Shines or ILSFA to share the complaint with the Program Administrators.

### *Investigation of Complaints*

The Program Administrators seek to respond to and investigate all complaints as soon as possible upon receipt. After receiving a consumer complaint, the Program Administrator follows up with the complainant and the Approved Vendor and/or Designee involved to seek more information. The Program Administrators then attempt to work with the Approved Vendor and/or Designee to come to a suitable solution to the complainant's issue. The Program Administrators record all complaints received and document steps taken toward resolution. In some cases, a complaint or the complainant's preferred resolution is outside the scope of the Program or the jurisdiction of the Program Administrator.<sup>7</sup> However, even when the Program Administrators determine they do not have the authority to direct the Approved Vendor or Designee to take a specific action, the Program Administrators may take reasonable steps to encourage the relevant Approved Vendor or Designee to resolve a complaint as completely and satisfactorily as possible. If, during a complaint investigation, the Program Administrator believes that an Approved Vendor or Designee may have violated Program requirements, the Program Administrator may issue a Notice of Potential Violation to that entity and will require a response (usually within a week's time). After providing an opportunity to respond to a Notice of Potential Violation, the Program Administrator will determine whether the relevant entity violated a Program requirement.

### *Pre-Disciplinary and Disciplinary Processes*

Upon a determination that Program requirements have been violated, the Program Administrators may take additional action (including disciplinary action) against an Approved Vendor and/or Designee. While the IPA lacks plenary authority to restrict market activity generally, Program Administrators may limit an offending entity's ability to participate in transactions that benefit from these state-administered incentive Programs.

If the Illinois Shines or ILSFA Program Administrator suspects or determines that an Approved Vendor, Designee, or other entity working through the Programs is not acting or has not acted in compliance with Program requirements, the Program Administrator will email that entity a Notice of Potential Violation and outline the problematic behavior, explain how the behavior is noncompliant with Program requirements, and request explanatory information and/or supporting documentation on the issue. After a review of any such response and further investigation into the facts and circumstances of a potential violation, the Program Administrator will determine what additional actions, if any, should be taken to address a confirmed Program violation. Options include, but are not limited to, a warning letter or disciplinary action such as a suspension. A formal warning is a

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<sup>7</sup> For example, complaints outside the scope of the Illinois Shines program could include complaints against Program-registered companies but for systems that are not intended to be applied to the Program (e.g., systems outside of Illinois).

letter that notifies Approved Vendors or Designees of behavior that violates Program requirements and directs them to stop this behavior. If the Program Administrator determines a suspension is merited, it sends a letter to that entity detailing the infraction, the terms of the suspension, and the available steps to appeal the suspension. The Program Administrators communicate the opportunity to appeal, and the appeal deadline, to the offending entity.

An Approved Vendor or Designee may appeal non-disciplinary and disciplinary actions to the IPA. To appeal to the IPA, the entity must send its appeal in writing on company letterhead explaining its rationale for why it believes the Program Administrator's determination is in error, as well as sharing any supporting information, documents, or communications. The IPA may request more information and materials from the entity and/or discuss with them to learn more about the basis for its position.

The IPA attempts to issue final determinations on appeals, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information. Further explanation of the pre-disciplinary and disciplinary processes can be found in Section 4.d below.

## 4. Illinois Shines Program Complaints

### a. Consumer Complaint Data Summary

This section of the report summarizes the complaints received by the Illinois Shines Program Administrator in various displays of data. In 2023, the Illinois Shines Program Administrator received 304 complaints. This was an increase from the 257 complaints received in 2022,<sup>8</sup> 165 complaints received in 2021, 77 complaints received in 2020, and 28 complaints received in 2019. It is worth noting that a consumer's complaint may be associated with an application submitted during a prior year. While a complaint in 2019 would have either been connected to an application submitted in 2019 or an application that had not yet been submitted, a complaint received in 2023 could be connected to an application submitted in 2019, 2020, 2021, 2022, or 2023, or connected to a not yet submitted application. As the number of customers involved in the Program accumulates from year to year, this creates a larger pool of potential complainants in each subsequent year.

Additionally, the Agency and Illinois Shines Program Administrator have worked to increase communication and coordination on complaints received from the Commission and the Office of the Illinois Attorney General. These efforts include a monthly meeting with the Commission and Office of the Illinois Attorney General as part of a Consumer Protection State Agency Working Group. Consumer complaints that are originally filed with these state agencies and relate to projects and participants of Illinois Shines are often provided to the Illinois Shines Program Administrator for further investigation, and this has led to both increased visibility of market issues affecting Illinois Shines consumers, as well as complaints lodged against Illinois Shines Approved Vendors and Designees.

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<sup>8</sup> There is a discrepancy between the 2022 Consumer Complaints Report and the data reflected here for the total number of complaints received in 2022. The number of complaints has been updated to reflect that the Program Administrator received 257 (not 259) complaints during the 2022 calendar year. There is also a discrepancy between data in the annual complaint report for 2021, and subsequent reports. The number of total complaints for 2021 has been updated to reflect 165 (rather than 164) complaints.

### i. Complaints Received – By Entity Type

There are two entity types that participate in Illinois Shines: Approved Vendors and their Designees. The data in this section of the report organizes complaints received against each entity type that participates in the Program.

- An *Approved Vendor* is an entity registered with the Program that serves as the counterparty to Renewable Energy Credit (“REC”) delivery contracts under the Program. Approved Vendors submit applications to the Program on behalf of their customers. Approved Vendors may be large national solar companies, smaller local installers, aggregators acting on behalf of other Program participants, or other entity types. As this entity is contractually responsible for the delivery of RECs under contracts stemming from the Program, these entities are vetted through an application process. A company must become an Illinois Shines Approved Vendor before it may become an ILSFA Approved Vendor.
- A *Designee* is an entity acting on behalf of an Approved Vendor or another Designee in the Program (and thus are generally, although not exclusively, customer-facing marketing or sales, solicitation, or installation firms). Designees that have direct interaction with end-use customers on behalf of an Approved Vendor or another Designee must register with the Program. There are four different types of Designees, each reflecting a role Designees can fulfill for an Approved Vendor. A Designee must select at least one role and can register for more than one role to accurately reflect the Designee’s role and relationship with the Approved Vendor. The four types of Designee roles in the Illinois Shines Portal are as follows:
  - *Disclosure Form Designee* - An entity permitted to generate DG and CS Disclosure Forms on behalf of an Approved Vendor. Only Designees designated as Disclosure Form Designees by an Approved Vendor can create and generate Disclosure Forms on behalf of that Approved Vendor;
  - *Community Solar Subscriber Designee* - An entity that manages the CS subscription information for an Approved Vendor's CS projects. CS Subscriber Designees can only enter subscribers for Disclosure Forms that they have created; therefore, a CS Subscriber Designee must also be registered with the Program as a Disclosure Form Designee;
  - *Marketing or Sales Designee* - An entity that acts as a marketing agent and/or customer acquisition agent on behalf of an Approved Vendor or Designee. This includes, among others, entities that engage in solicitations through any channel (in-person, telephone, etc.), as well as entities that perform online lead generation services; and
  - *Installer Designee* - An entity that installs systems on behalf of an Approved Vendor or Designee.

Finally, the Program Administrator sometimes receives complaints concerning entities that are not registered with the Program. These complaints often concern companies marketing the Program or conducting installations for projects intended to be applied to the Program, but where the entity has not registered as an Approved Vendor or Designee with the Program.

The following is a breakdown of the 304 Illinois Shines complaints received in 2023 based on the Program participant:



- Complaints against Designees: 201
- Complaints against Approved Vendors: 98
- Complaints against entities not registered with the Program: 5

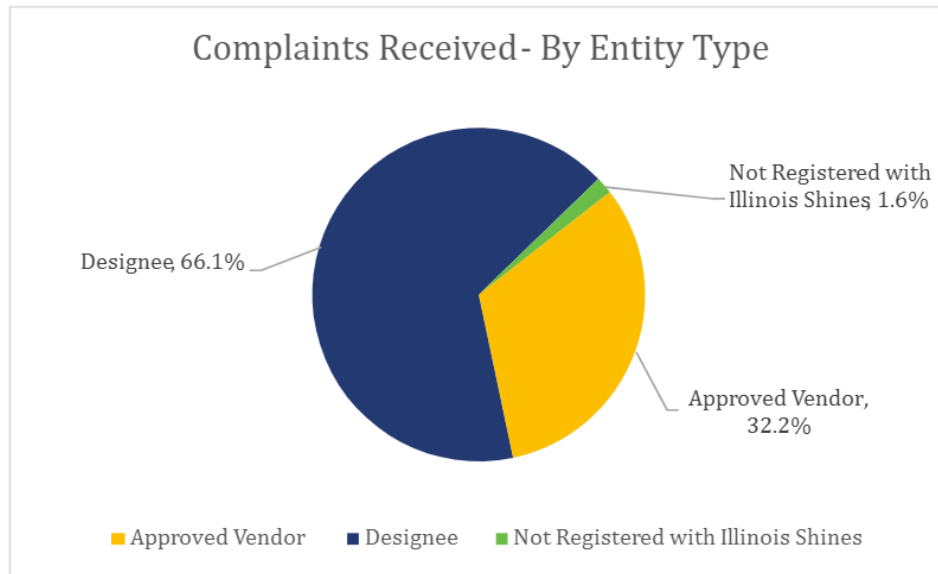


Figure 1: This chart shows the breakdown of entity type, by percentage, for all complaints received by the Illinois Shines Program Administrator in 2023.

#### ii. Complaints Received – By Complaint Subject

The Program Administrator tracks the primary subject of each complaint and creates new complaint subjects when the Program Administrator observes new trends in complaints. The complaints received in 2023 fell into one or more of nine categories. In cases where multiple categories apply to a single complaint, the Program Administrator identified the main issue of concern to the customer. For example, a customer filing a complaint regarding a delay in their Illinois Shines application submission may also have not received a response from their Approved Vendor or solar installer after attempting to contact the Program entity regarding these concerns. The complaint types and descriptions are summarized in the table below, along with a breakout of the number of cases in each category.

<b>Complaint Subject</b>	<b>Description</b>	<b>Number of Complaints</b>
Illinois Shines application issues	The customer is concerned about errors their Approved Vendor made with their Illinois Shines application, or with a delay in the Approved Vendor submitting the application.	79
Mechanical or installation issue	The customer is concerned about an issue with a physical component of their system (i.e., panel, inverter, microinverter, etc.), or reports property damage because of the installation.	77
Misleading marketing	The customer reports that they received misleading information related to expected savings after installing solar, expected impact of the federal tax credit, or expected amount of the Illinois Shines incentive paid to the customer by the Approved Vendor.	64
Failure to respond to customer	The customer has not received an adequate response from their Approved Vendor or Designee to a customer question or concern.	35
Installation contract terms	The customer is concerned about the terms of their installation contract, their financing agreement, etc.	19
Miscellaneous	A complaint that does not fit any of the other categories on this list.	13
CS subscription or payment delay	The customer is experiencing issues related to their community solar subscription or billing.	8
Disclosure Form issues	The customer was not provided with a Disclosure Form before signing an installation or Community Solar subscription agreement.	5
REC payment delay	The customer is concerned about a delay in receiving their expected payment from their Approved Vendor, after the Approved Vendor has already received the REC incentive payment for their project	4
<b>Total</b>		<b>304</b>

Figure 2: This table shows the number of complaints received by the Program Administrator for each subject category of complaint in 2023.

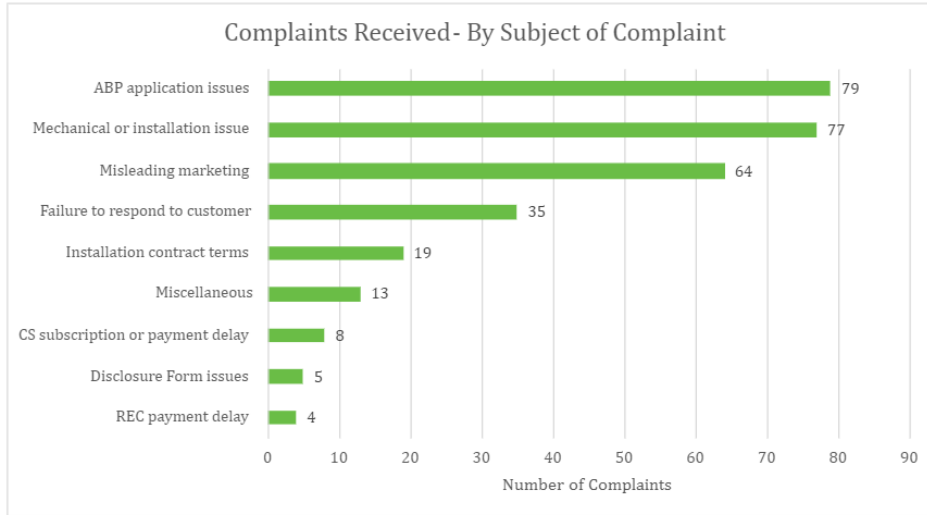


Figure 3: This graph shows the number of complaints received by the Program Administrator for each subject category in 2023.

### iii. Complaints Received – By Entity

Below is a list of all Approved Vendors, Designees, and non-Program entities about which customers have filed a formal complaint with the Illinois Shines Program Administrator since the Program’s inception. The tables list the number of complaints filed against each entity in each year from 2019 through 2023.<sup>9</sup> An entity may be listed in more than one section (for example, as an Approved Vendor and as a Designee) if they operated in different roles on different projects that led to complaints.

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<sup>9</sup> See footnote 5.

Company Name	2019	2020	2021	2022	2023	Total
<b>Approved Vendor</b>	<b>10</b> <sup>[10]</sup>	<b>40</b> <sup>[11]</sup>	<b>57</b>	<b>68</b>	<b>98</b>	<b>273</b>
Sunrun Installation Services Inc.	4	5	9	30	25	73
Tesla, Inc.		1	6	6	7	20
Vivint Solar Developer, LLC	1	2	12	2	1	18
Freedom Forever Illinois LLC			2	3	12	17
Eco-Solar Solutions, LLC		2	6	8		16
WCP Solar Services, LLC	1	11	2	2		16
Revolution Energy Systems <sup>12</sup>					15	15
Carbon Solutions SREC, LLC	2	6	3		3	14
SRECTrade, Inc.		1	9	3		13
SUNPOWER CAPITAL SERVICES, LLC		1		3	7	11
Novel Energy Solutions LLC		6				6
Vista Energy Marketing, L.P.					5	5
Summit Solar Solutions LLC			3	1	1	5
Simple Solar					5	5
Sunnova Energy Corporation					5	5
Certasun LLC		1		1	2	4
IL-Solar, Inc.	1	1		1		3
Solgen Power LLC				3		3
GRNE		1		1	1	3
EFS Energy				1	1	2
C.A. Jones					2	2
IGS Solar LLC					2	2
National Solar Service LLC					2	2
Tron Solar				1		1
Harvest Solar, LLC	1					1
Promethean Solar			1			1
Enertech Global, LLC		1				1
Clean Energy Design Group, Inc.			1			1
Iowa Wind and Solar DBA Simpleray				1		1
Verde Solutions LLC		1				1
JD Pro Electric Inc.			1			1
Balance Solar LLC				1		1
Acorn Management Group					1	1
Windssoleil Inc.			1			1
NextEra Energy Capital Holdings, Inc dba Everbright LLC					1	1
Clearway Community Solar LLC			1			1

<sup>10</sup> In the 2022 Annual Complaints Report, the total number of complaints against Approved Vendors for 2019 was listed as "11." In 2023, the Program Administrator updated this number to 10 due to the Program Administrator recategorizing one complaint to having been filed against a non-Program entity.

<sup>11</sup> In the 2022 Annual Complaints Report, the total number of complaints against Approved Vendors for 2022 was listed as "41." In 2023, the Program Administrator updated this number to 40 due to the Program Administrator recategorizing one complaint to having been filed against a non-Program entity.

<sup>12</sup> While Revolution Energy Systems only received 15 complaints in 2023, the Program Administrator has received 116 additional complaints against Revolution in 2024 as of the date of this report, alleging numerous issues including failure to pass through promised incentive payments, delays in submitting project applications, nonresponsiveness, mechanical and installation issues, misleading marketing, and others. The Program Administrator suspended Revolution on February 2, 2024 for failure to pass through promised incentives to customers.

Company Name	2019	2020	2021	2022	2023	Total
<b>Designee</b>	<b>12</b>	<b>35</b>	<b>106</b>	<b>186</b> <sup>[13]</sup>	<b>201</b>	<b>540</b>
Power Home Solar, LLC		1	17	46	20	84
Palmetto Solar LLC	2	4	12	21	11	50
Windsoleil Inc.		1	16	23	5	45
Standard Eco LLC	1	8	7	8	3	27
Headline Solar			12	3	11	26
Moxie Solar		1	1	7	7	16
Arcadia				11	5	16
Modern Mill LLC			2	4	10	16
Titan Solar Power				1	14	15
Sun Badger Solar		3	1	1	9	14
SunPro Solar			1	4	9	14
Solar Ready Solutions, LLC		1	3	5	4	13
Empire Solar Group, LLC	1	1	6	1	1	10
Excel Home Solar	1		1	4	4	10
Clearway Energy Group				6	4	10
Solis Energy Services				3	6	9
National Solar Service				4	4	8
Iconic Energy	4		3			7
CR Solar			3	4		7
Zenernet				2	5	7
SunAir Systems LLC		2	2	2		6
Ampion, Inc.				1	5	6
Eco Management Systems Limited LLC		1	4	1		6
Smart Energy Solutions				4	2	6
LGCY Power					6	6
Nexamp, Inc.				2	3	5
Green Solar Technologies		1		1	3	5
Noonday Solar					5	5
Eagle Point Solar LLC		3	1			4
Bright Planet Solar, INC.			1	1	2	4
SolarUp		1		2	1	4
Rethink Electric	1		1		1	3
Encor Solar LLC			2	1		3
Phoenix Exteriors, Inc.				1	2	3
Smart Money Solar		1	1		1	3
IGS Solar LLC					3	3
Kapital Electric, Inc.			1	1	1	3
Solar SME, Inc.			1	1		2
Tron Solar		1			1	2
Freedom Solar Pros					2	2
Direct Solar			1		1	2
Ailey Solar Electric, Inc.	1	1				2
Blue Sky Smart Solutions					2	2

<sup>13</sup> In the 2022 Annual Complaints Report, the total number of complaints against Designees was 187 for 2022. In 2023, the Program Administrator removed one of these complaints – which was previously under investigation at the time of the 2022 Annual Complaints Report – due to nonresponsiveness by the customer.

Company Name	2019	2020	2021	2022	2023	Total
Freedom Forever Illinois LLC			1		1	2
Caliber Solar					2	2
Clean.Tech			1	1		2
Prestige Solar Solutions				2		2
Windfree Solar		1			1	2
Route 66 Solar LLC				1	1	2
Helio Solar Power, LLC.					1	1
Springfield Electric					1	1
Fosler Construction Company, INC.					1	1
Earth Wind And Solar Energy, LLC					1	1
Cell Electric					1	1
OurWorldEnergy			1			1
Solar One, LLC					1	1
IM Sustainable			1			1
MC2 Energy Services, LLC				1		1
API Solar				1		1
Stateline Solar					1	1
JD Pro Electric Inc.		1				1
GRNE					1	1
Conscious Energy Solutions LLC				1		1
Common Energy				1		1
PSG LMTD					1	1
Solar Power Midwest, Inc.					1	1
EnergyBillCruncher					1	1
Magitek Energy Solutions, Inc.					1	1
Revolution Energy Systems				1		1
Cross Country Construction			1			1
Constellation NewEnergy, Inc.					1	1
FreeWorld Solar					1	1
Arrow Energy Solutions					1	1
Summit Solar Solutions LLC					1	1
Sigora Solar, LLC			1			1
Sun Solar, LLC					1	1
Campbell Electric					1	1
D&D Electric, LLC		1				1
Expert Energy Management LLC				1		1
Tri-State Renewable Energy					1	1
Solar Energy Solutions, LLC		1				1
Blue Raven Solar, LLC					1	1
Solar Grids Quad Cities LLC					1	1
Service 1st					1	1
Advanced Power USA					1	1
Legacy Solar, LLC	1					1

Company Name	2019	2020	2021	2022	2023	Total
<b>Non-Program Entity</b>	<b>6</b> <sup>[14]</sup>	<b>2</b> <sup>[15]</sup>	<b>2</b>	<b>3</b> <sup>[16]</sup>	<b>5</b>	<b>18</b>
Offset Solar LLC	4					4
Energy of Illinois Inc.				3		3
Total Solar Solutions	1	1				2
US Renewable Energy					2	2
Ultimate Energy					1	1
Sunsource Homes Inc.			1			1
EPO Energy					1	1
Brio Energy LLC	1					1
Woodside General Contracting/All Things Solar and Roofing					1	1
Phenomenal Power		1				1
Solarize South Carolina, LLC			1			1

Figure 4: These tables show how many consumer complaints were filed against each company throughout the life of the Program. If a solar company or Program entity is not listed here, it means that the Program Administrator has never received a formal complaint against that company. Companies are organized in this table according to their role in the Program. "Non-Program Entity" is defined as an entity that is not registered as an Approved Vendor or as a Designee with the Program.

#### Complaints Received Against Approved Vendors

In 2023, the Program Administrator received 98 complaints against companies serving as a customer's Approved Vendor. For some of these complaints, the Approved Vendor also serves as the customer's installation and/or sales company. For other complaints, the Approved Vendor only serves as the company that handles the submission of the customer's application to the Program. The below chart provides a list of all complaints received in 2023 specifically against a customer's Approved Vendor.

<sup>14</sup> The 2022 Annual Complaints Report listed five complaints against non-Program entities. One prior complaint against an Approved Vendor was later recategorized as against a non-Program entity after discovery that the company was not registered at the time of the complaint.

<sup>15</sup> In the 2022 Annual Complaint Report, there was one complaint listed against a non-Program entity. In 2023, the Program Administrator discovered that a complaint had been mischaracterized against an Approved Vendor when that company had not been accepted as an Approved Vendor in the Program.

<sup>16</sup> In the 2022 Annual Complaint Report, there were four complaints listed against non-Program entities. In 2023, the Program Administrator recategorized one of these complaints as it had been filed against a registered Designee.

Approved Vendor	Complaints Received Against Entity in 2023
Sunrun Installation Services Inc.	25
Revolution Energy Systems <sup>17</sup>	15
Freedom Forever Illinois LLC	12
SUNPOWER CAPITAL SERVICES, LLC	7
Tesla, Inc.	7
Sunnova Energy Corporation	5
Simple Solar	5
Vista Energy Marketing, L.P.	5
Carbon Solutions SREC, LLC	3
C.A. Jones	2
Certasun LLC	2
IGS Solar LLC	2
National Solar Service LLC	2
EFS Energy	1
Vivint Solar Developer, LLC	1
Summit Solar Solutions LLC	1
Acorn Management Group	1
GRNE	1
NextEra Energy Capital Holdings, Inc dba Everbright LLC	1
<b>Total</b>	<b>98</b>

Figure 5: This table shows the number of complaints received against Approved Vendors in 2023. If an Approved Vendor is not listed here, it means that the Program Administrator did not receive a formal complaint against that Approved Vendor (in its role as an Approved Vendor) in 2023.

#### Complaints Received Against Designees and Entities Not Registered with Illinois Shines, by Approved Vendor

In 2023, the Program Administrator received 206 complaints against a company other than the customer's Approved Vendor. These include complaints against entities registered as Designees and Nested Designees, and sales companies and installation companies that had failed to register as Designees but were marketing or installing projects intended to be applied to the Program. Below is a list of all complaints received in 2023 against a company other than the customer's Approved Vendor. These complaints are organized by the customer's Approved Vendor, when applicable.<sup>18</sup> The complaints are organized by Approved Vendor because Approved Vendors are ultimately responsible for the conduct of Designees and others acting on their behalf in the Program. Note that Designees may register under multiple Approved Vendors. For example, an Installer Designee may

<sup>17</sup> See footnote 11.

<sup>18</sup> Complaints may be unassociated with an Approved Vendor in several cases. For example, Community Solar complaints may be unassociated with an Approved Vendor if the customer's subscription is not connected to a project yet. (Note that under the Consumer Protection Handbook, if a Designee markets community solar subscriptions that are not connected to a specific Approved Vendor, any Approved Vendor to which the prospective customer might ultimately be assigned is responsible for any marketing, enrollment, and other Designee activities that occur prior to the assignment of the customer to a specific project.) In other cases, the Program Administrator has received complaints against a Designee for marketing the Program while suspended (Designees are not affiliated with any Approved Vendor during their suspension).



perform installations for multiple Approved Vendors but is required to register separately under each of its Approved Vendors. In the below table, Designees that received complaints related to their work under more than one Approved Vendor are listed separately by Approved Vendor, based on the relevant Approved Vendor for the customer who raised the complaint.

Company Name	Complaints
<b>Carbon Solutions SREC, LLC</b>	
Titan Solar Power	13
Sun Badger Solar	8
Palmetto Solar LLC	7
Moxie Solar	6
Solis Energy Services	5
SunPro Solar	4
Headline Solar	4
Noonday Solar	4
Windsoleil Inc.	3
Green Solar Technologies	3
Modern Mill LLC	3
LGCY Power	2
National Solar Service	2
Smart Energy Solutions	2
Windfree Solar	1
Fosler Construction Company, INC.	1
Empire Solar Group, LLC	1
Advanced Power USA	1
Helio Solar Power, LLC.	1
Earth Wind And Solar Energy, LLC	1
Magitek Energy Solutions, Inc.	1
Route 66 Solar LLC	1
Stateline Solar	1
Service 1st	1
Sun Solar, LLC	1
Campbell Electric	1
GRNE	1
Smart Money Solar	1
Cell Electric	1
Solar Grids Quad Cities LLC	1
SolarUp	1

<b>Company Name</b>	<b>Complaints</b>
<b>SRECTrade, Inc.</b>	
Power Home Solar, LLC	15
Modern Mill LLC	6
Headline Solar	6
SunPro Solar	5
Zenernet	5
Standard Eco LLC	3
Solar Ready Solutions, LLC	3
Palmetto Solar LLC	3
National Solar Service	2
Phoenix Exteriors, Inc.	2
Bright Planet Solar, INC.	1
Springfield Electric	1
Tron Solar	1
Arrow Energy Solutions	1
Kapital Electric, Inc.	1
Excel Home Solar	1
Titan Solar Power	1
Solar Power Midwest, Inc.	1
Direct Solar	1
Windssoleil Inc.	1
Blue Raven Solar, LLC	1
<b>Sunrun Installation Services Inc.</b>	
Freedom Solar Pros	1
Bright Planet Solar, INC.	1
Solar Ready Solutions, LLC	1
EnergyBillCruncher	1
Freedom Forever Illinois LLC	1
<b>Vista Energy Marketing, L.P.</b>	
Excel Home Solar	3
<b>Freedom Forever Illinois LLC</b>	
Freedom Solar Pros	1
Caliber Solar	1
<b>SUNPOWER CAPITAL SERVICES, LLC</b>	
Summit Solar Solutions LLC	1
Rethink Electric	1
<b>MENNIE SOUTH FC, LLC</b>	
Nexamp, Inc.	2
<b>Sol Systems, LLC</b>	
Solar One, LLC.	1
<b>Prophet Solar, LLC</b>	
Clearway Energy Group	1

<b>Company Name</b>	<b>Complaints</b>
<b>NextEra Energy Capital Holdings, Inc dba Everbright LLC</b>	
LGCY Power	2
<b>SRC IL REC, LLC</b>	
Arcadia	1
<b>CLAY FC, LLC</b>	
Nexamp, Inc.	1
<b>Sunnova Energy Corporation</b>	
Power Home Solar, LLC	1
<b>Long John Solar, LLC</b>	
Clearway Energy Group	1
<b>Olmstead Solar II, LLC</b>	
Clearway Energy Group	1
<b>Peterman Solar II, LLC</b>	
Clearway Energy Group	1
<b>No Approved Vendor</b>	
Ampion, Inc.	5
Power Home Solar, LLC	4
Arcadia	4
IGS Solar LLC	3
Blue Sky Smart Solutions	2
LGCY Power	2
FreeWorld Solar	1
Caliber Solar	1
Palmetto Solar LLC	1
Noonday Solar	1
PSG LMTD	1
Headline Solar	1
Solis Energy Services	1
Constellation NewEnergy, Inc.	1
Sun Badger Solar	1
Tri-State Renewable Energy	1
Moxie Solar	1
Windssoleil Inc.	1
Modern Mill LLC	1
<b>Non-Program Entity</b>	
US Renewable Energy	2
Woodside General Contracting/All Things Solar and Roofing	1
EPO Energy	1
Ultimate Energy	1
<b>Total</b>	<b>206</b>

Figure 6: This table shows the number of complaints received against Designees and companies not registered with the Program in 2023, grouped by the relevant Approved Vendor. If a Designee (or company not registered with the Program) is not listed here, it means that the Program Administrator did not receive a formal complaint against that company in 2023.

*Distributed Generation Projects — Share of Complaints Received Compared to Share of Applications Submitted by Corresponding Approved Vendor*

Approved Vendors submit varying numbers of project applications to the Program. Some submit a single application to the Program while other Approved Vendors submit hundreds or thousands of applications. Some Approved Vendors serve as REC aggregators and submit applications from many different installation partners to the Program; other Approved Vendors only submit applications for systems that they also sell and install. It is helpful to compare the total number of applications submitted to the number of complaints received against an Approved Vendor, to better understand factors that may affect why the Program Administrator receives more complaints associated with some Approved Vendors than others.

The following chart presents the number of complaints associated with each Approved Vendor's DG projects in 2023, including complaints directed against the Approved Vendor, as well as complaints against Designees that partnered with that Approved Vendor on the complainant's project. The chart also provides the number of Part I applications that the Approved Vendor submitted in 2023, and the total number of Part I applications that the Approved Vendor submitted since the Program began accepting applications. The chart shows the percentage of total complaints and total Part I applications each entity was responsible for in 2023—essentially, a rough estimate of the Approved Vendor's "market share" of projects and complaints.

Approved Vendor	Complaints Associated with Approved Vendor in 2023		Approved Vendor's Part I Application Data for Comparison			
	Number of Complaints	Percent of Total DG Complaints in 2023	Number of Part I Apps Submitted by Entity in 2023	Percent of Total Part I Apps Submitted in 2023	Total Part I Apps Submitted by Entity from 2019-2023	Percent of Total Part I Apps Submitted from 2019-2023
Carbon Solutions SREC, LLC	86	30.5%	7,812	30.4%	15,943	22.5%
SRECTrade, Inc.	61	21.6%	29	0.1%	6,079	8.6%
Sunrun Installation Services Inc.	30	10.6%	9,251	36.0%	23,919	33.7%
Revolution Energy Systems, Inc. <sup>19</sup>	15	5.3%	1,045	4.1%	1,045	1.5%
Freedom Forever Illinois LLC	14	5.0%	1,049	4.1%	1,283	1.8%
SUNPOWER CAPITAL SERVICES, LLC	9	3.2%	2,017	7.8%	5,327	7.5%

<sup>19</sup> See footnote 11.

Approved Vendor	Complaints Associated with Approved Vendor in 2023		Approved Vendor's Part I Application Data for Comparison			
	Number of Complaints	Percent of Total DG Complaints in 2023	Number of Part I Apps Submitted by Entity in 2023	Percent of Total Part I Apps Submitted in 2023	Total Part I Apps Submitted by Entity from 2019-2023	Percent of Total Part I Apps Submitted from 2019-2023
Vista Energy Marketing, L.P.	8	2.8%	367	1.4%	403	0.6%
Tesla, Inc.	7	2.5%	230	0.9%	1,089	1.5%
Sunnova Energy Corporation	6	2.1%	741	2.9%	782	1.1%
Simple Solar	5	1.8%	26	0.1%	39	0.1%
NextEra Energy Capital Holdings, Inc. dba Everbright LLC	3	1.1%	152	0.6%	152	0.2%
Certasun LLC	2	0.7%	544	2.1%	1,433	2.0%
National Solar Service LLC	2	0.7%	-	0.0%	-	0.0%
C.A. Jones	2	0.7%	1	0.0%	2	0.0%
Vivint Solar Developer, LLC	1	0.4%	-	0.0%	4,140	5.8%
IGS Solar LLC	1	0.4%	128	0.5%	287	0.4%
EFS Energy	1	0.4%	-	0.0%	7	0.0%
GRNE Solutions LLC	1	0.4%	89	0.3%	1,019	1.4%
Acorn Management Group	1	0.4%	132	0.5%	160	0.2%
Summit Solar Solutions, LLC	1	0.4%	-	0.0%	758	1.1%
Sol Systems, LLC	1	0.4%	-	0.0%	-	0.0%

Figure 7: This chart compares (a) the number and 'market share' of complaints associated with a given Approved Vendor's DG projects to (b) the number and 'market share' of Part I DG applications that the Approved Vendor submitted in 2023, and (c) the number and 'market share' of Part I DG applications that the Approved Vendor submitted since the beginning of the Program. The chart does not list Approved Vendors with no complaints, and as a result the percentages for Part I applications do not total 100%. The chart does not include complaints associated with no Approved Vendor or a non-Program entity, so the "Percent of Total Complaints" column does not total 100%. The chart is limited to complaints associated specifically with DG applications (and does not include CS) because the number of projects for which a DG Part I application has been submitted more closely correlates with the number of customers / potential complainants.

#### iv. Complaints Received – By Complaint Status

Currently, the Illinois Shines Program Administrator has four status categories for complaints. These status categories are:

- **Under Investigation** – This status indicates a complaint that is actively being investigated by the Program Administrator as of the date of release of this Report. A complaint remains in this status until (a) it is marked as Resolved, or (b) the Program Administrator determines that it is unable to reach a resolution between the parties, or (c) the complainant becomes unresponsive to the Program Administrator.
- **Resolved** – This status indicates a complaint where the Program Administrator was able to help the customer reach a resolution with the company, where the customer is satisfied with the company's explanation for the issue, or where the Program Administrator is satisfied with the explanation given by the company.
- **Closed** – Closed complaints can be divided into two categories: “Closed” and “Closed – Customer Nonresponsive.”
  - **Closed** – This status indicates a complaint where, after multiple attempts by the Program Administrator to help resolve the customer's concerns, the company did not resolve the customer's concerns, or the Program Administrator and the customer were unable to receive a satisfactory explanation from the company regarding the customer's concerns. If the company violated Program requirements, the Program Administrator will consider disciplinary action.
  - **Closed – Customer Nonresponsive** – This status indicates a complaint where the customer did not provide all the information necessary for the Program Administrator to investigate the complaint, or where the customer did not respond to the Program Administrator's attempts to address their complaint. If the Program Administrator does not receive adequate documentation from the customer, the Program Administrator is unable to adequately work to resolve the complaint with the entity the complaint was filed against.
- **Reopened** – This status indicates a renewed complaint that had previously been marked as either “Resolved” or “Closed” by the Program Administrator. Reopened complaints are complaints where the customer contacts the Program Administrator stating that the same issue in their original complaint has recurred, or that a new similar issue has arisen.

Before categorizing a complaint status as either “Resolved” or “Closed,” the Program Administrator performs a full investigation of the complaint. This process includes working with the complainant to obtain any relevant documentation and information related to the complaint to determine the relevant facts. Complaints are marked as either “Resolved” or “Closed” only if the investigation of the complaint has reached an end point. This end point differs depending on the particular facts of the case. For example, the Program Administrator will only list a complaint as “Resolved” if the Program Administrator successfully facilitated an agreeable outcome for both parties, or where the Program Administrator is satisfied with the explanation given by the entity who is the subject of the complaint. A complaint is marked as “Closed” for cases where, after multiple attempts by the Program Administrator to help the parties reach a resolution, the customer's Approved Vendor or Designee did not offer the customer a satisfactory resolution and/or explanation for the issues in the customer's complaint.

If during (or at the conclusion of) an investigation, the Program Administrator has reason to believe a Program violation occurred, the Program Administrator will issue a Notice of Potential Violation to the relevant entity. After receiving a response to such a Notice, the Program Administrator may

implement consequences for violations of Program requirements as laid out in the Consumer Protection Handbook's Program Violation Response Matrix ("Matrix"). Based on the facts of the case and by referencing the Matrix, the Program Administrator will determine whether non-disciplinary action, such as a corrective action and/or a formal warning, is appropriate, or if more serious disciplinary action such as suspension is warranted. Additionally, if a company is not responsive to the Program Administrator during the investigation of the customer's complaint, the Program Administrator may restrict the company's access to the Illinois Shines Portal until they become responsive to the Program Administrator's requests for information. Restricted portal access suspends the ability for the company to submit customer Disclosure Forms or project applications, as well as other portal capabilities, and may be paired with non-disciplinary or disciplinary actions.

The Program Administrator strives to resolve each complaint submitted to the satisfaction of customers. However, some complaints received by the Program Administrator do not constitute violations of specific Program requirements and may therefore be considered outside of the Program's scope. As Program requirements evolve over time, the Agency strives to address and prevent negative customer experiences more fully in updates to Program documents. For example, in the initial Consumer Protection Handbook issued July 14, 2022—which Approved Vendors and Designees were required to comply with beginning August 28, 2022—the Agency added the explicit requirement and retained it in the subsequent version, that all Approved Vendors and Designees must "ensure that their work does not create safety hazards or property damage from poor workmanship" and must "comply with all contractual obligations to customers."<sup>20</sup> However, the Program Administrator may still receive complaints outside the scope of the Program, or complaints that implicate contractual disputes that the Program Administrator cannot weigh in on.

When the Program Administrator receives a complaint from a customer that is considered outside the scope of the Program or that implicates ambiguous contractual issues, the Program Administrator may still seek to assist the customer in any way it can within the confines and scope of the Program. This response includes contacting the customer's Approved Vendor and/or Designee to facilitate a discussion between the two parties and obtaining a response from the Approved Vendor and/or Designee regarding the issue. The Program Administrator may also give the customer instructions on how to submit a complaint to the Commission and/or the Office of the Illinois Attorney General, or refer the complaint to another agency, depending on the facts involved.

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<sup>20</sup> 2022 Consumer Protection Handbook, p.7.

The following shows the breakdown of total complaints received by the Program Administrator from January 1, 2023, to December 31, 2023, by complaint status, as of the release of this Report on the final report date:<sup>21</sup>

Complaint Status	Number of Complaints
Resolved	151
Closed	104
Under investigation	35
Closed – customer nonresponsive	10
Reopened	4
<b>Total</b>	<b>304</b>

Figure 8: This table shows the status of each complaint received in 2023 as of the date of this Report.

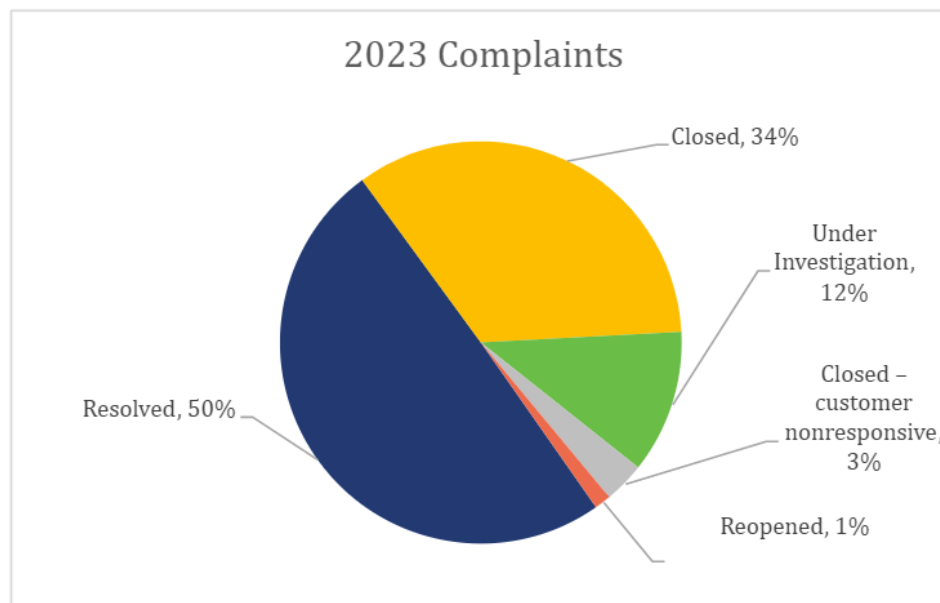


Figure 9: This chart shows the percentage of complaints in each complaint status for complaints received in 2023.

### b. Illinois Shines Consumer Complaint Data Analysis

Since 2019, the Illinois Shines Program Administrator’s dedicated consumer complaint phone number and email address have been available to consumers on both the Illinois Shines and (former) Illinois ABP websites. Further, the Program Administrator created a web form customers may use to file complaints with the Program.<sup>22</sup> These resources create a user-friendly experience for customers seeking to file a complaint.

<sup>21</sup> All complaints received in 2020-2022 are either Resolved or Closed; no complaints received before 2023 remain under investigation.

<sup>22</sup> The web form is available at <https://illinoisshines.com/consumer-complaint-center/>.



### i. Complaints Received Compared to Total Applications Received

During calendar year 2023, the Program Administrator received 304 complaints, which is an increase from previous years' complaints received.

Calendar Year	Complaints Received
2023	304
2022	257
2021	165
2020	77
2019	28

The rate at which applications were submitted to the Program peaked in the second quarter of 2023, further speeding the increase in the number of consumers with projects in the Program. The increasing number of consumers across DG and CS project categories and those interacting with Approved Vendors and Designees across various stages of the project lifecycle may explain the increased number of complaints received by the Program each year.

In 2023, Approved Vendors submitted a total of 25,699 DG Part I project applications – constituting a 123% increase (more than double) from the 11,516 DG Part I applications submitted in 2022. The number of complaints regarding DG projects also increased from 2022 to 2023, but to a much lesser degree. The Program received 282 complaints in 2023 related to DG projects which is an increase of 19% from the 237 DG related complaints received in 2022.

Regarding CS complaints, at the end of 2023, there were 29,707 active CS subscribers subscribed across 115 CS applications.<sup>23</sup> However, the number of CS complaints remained steady at 22 (the same as in 2022), despite the number of active subscribers increasing 21% since the end of 2022.

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<sup>23</sup> A total of 1,191 CS applications were submitted to the Program, but only 108 applications were awarded capacity with active subscribers.

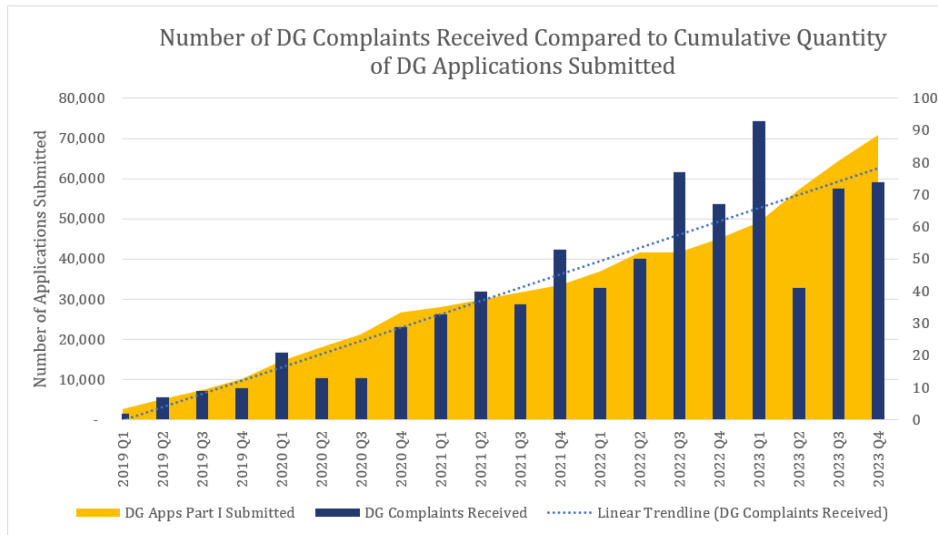


Figure 10: This graph shows the cumulative total number of Part I DG applications submitted to the Program Administrator and the number of DG customer complaints received on a quarterly basis since the Program opened in 2019 through the end of 2023. This graph demonstrates how the total base of Illinois consumers with DG applications and the number of DG in Illinois Shines have grown over time.

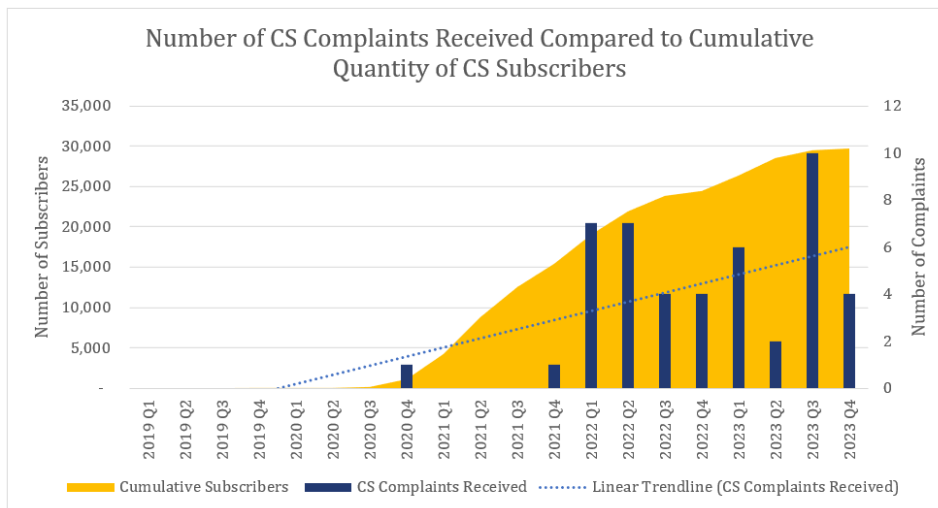
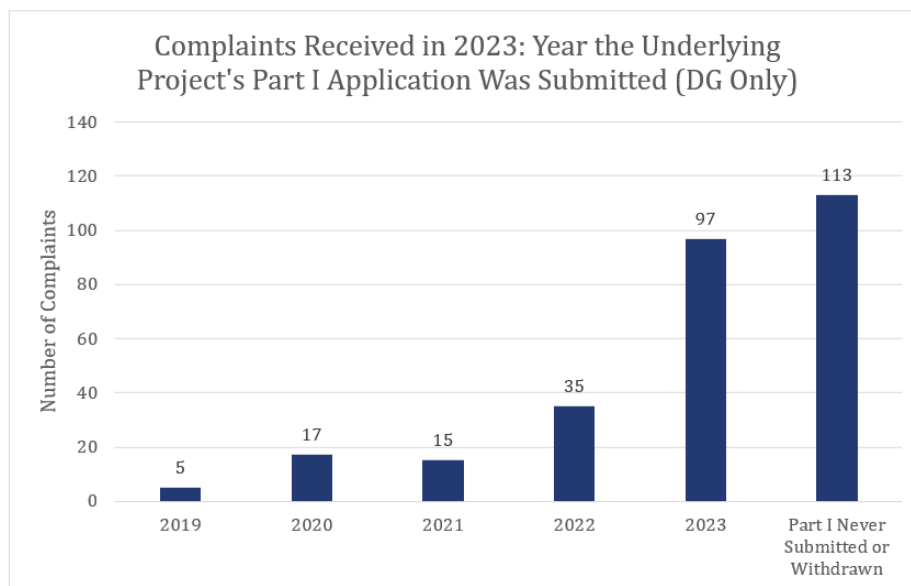


Figure 11: This graph shows the cumulative total number of CS subscribers and the number of CS complaints received quarterly since the Program opened in 2019 through the end of 2023.

Figure 10 shows that the number of DG complaints received each quarter over the life of the Program follows a generally increasing trend line. However, Figure 11 illustrates that the number of CS complaints each quarter has a weak correlation with the increasing number of cumulative CS subscribers; as shown in the second and final quarters of 2023 when complaints were relatively low despite cumulative number of subscribers increasing.

As noted above, a consumer may submit a complaint years after they signed an installation or subscription contract. Around 25% of consumers who submitted complaints during 2023 did so in relation to a Part I application that was submitted in a previous year.



*Figure 12: This graph shows—for complaints submitted in 2023—when the Part I application for the underlying project was submitted to the Program. It includes bars to indicate complaints submitted by customers who have an application submitted, as well as customers who do not have an application submitted to the Program (“PI Never Submitted or Withdrawn App”). “Part I Never Submitted or Withdrawn App” includes customers who decided not to participate in the Program or canceled their solar contract as well as customers whose Part I applications have not been submitted to the Program. Complaints can be submitted to the Program Administrator at any point, including before an associated application is submitted to the Program. This chart does not include CS complaints received by the Program Administrator in 2023, as CS subscribers do not have individual applications.*

Figure 12 shows that of the 282 complaints received in 2023 relating to DG projects, 72 were submitted by customers who had a Part I application submitted in a previous year. Five of the 72 complainants had Part I applications submitted in 2019, and 17 had a Part I application submitted in 2020, up to almost four years before the customer filed a complaint in 2023. Complaints received long after the relevant Part I application was submitted can relate, for example, to issues with the system that have appeared several months to several years after the installation, or to issues receiving an incentive payment from the customer’s Approved Vendor.

Figure 12 also shows that 113 of the 282 customers that submitted complaints in 2023 did not yet have a submitted Part I application (40%). Complaints that are received before a customer’s Part I application is submitted can relate to many issues, including installation issues, responsiveness issues, a delay in a customer’s Part I application submission, or issues relating to an Approved Vendor or Designee going out of business or leaving the Illinois market. In 2022, the Program Administrator received nearly the same number of complaints (114) as in 2023 (113) from customers without submitted Part I applications. While the number of complainants without Part I submitted applications stayed even, the percentage share of overall complainants dropped from 48% to 40% due to the overall number of complaints increasing by 19%.

The 113 complaints received in 2023 from customers who do not have a submitted Part I application demonstrates that while the total number of Part I applications received may be used as a proxy for total customer base, it does not represent the full universe of potential complainants.

ii. Program Entities with Multiple Complaints, Few Complaints, or No Complaints

The majority of companies participating in the Program as DG and/or CS Approved Vendors or Designees were not the subjects of formal complaints in 2023.

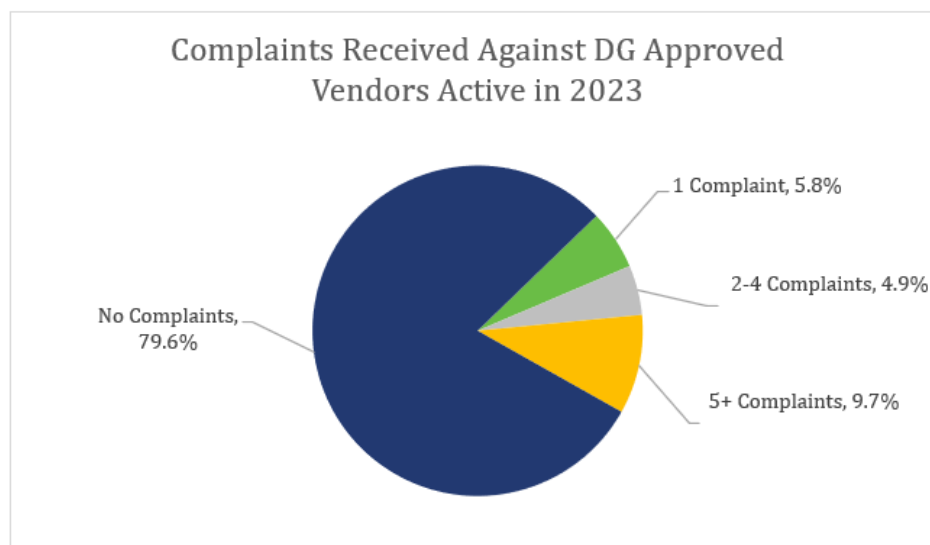


Figure 13: This chart shows all active DG Approved Vendors, and the number of complaints filed against each Approved Vendor in 2023. An active DG Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one DG Disclosure Form in 2023. There were 103 active DG Approved Vendors in 2023.

Figure 13 shows that 79.6% of DG Approved Vendors active in 2023 did not have a complaint filed against them. An active DG Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one DG Disclosure Form in 2023. This percentage is 12.4% lower than the 92% of DG Approved Vendors active in 2022 who did not have a complaint filed against them in 2022. About 5.8% of Approved Vendors active in 2023 only had one complaint filed against them, which does not necessarily indicate a widespread issue within the company. A higher percentage, 14.6%, of Approved Vendors active in 2023 had more than one complaint filed against them. This is an increase from 5% of DG Approved Vendors in 2022 who had more than one complaint filed against them. Finally, 9.7% of Approved Vendors had more than five complaints filed against them in 2023 (up from 1% in 2022). While an increase in complaints for the Approved Vendors with the largest market share of DG customers is to be expected, the Program Administrator notes some relatively smaller Approved Vendors with five or more complaints were due, at least in part, to the Approved Vendor's nonresponsiveness to customers following financial distress and/or staffing layoffs.

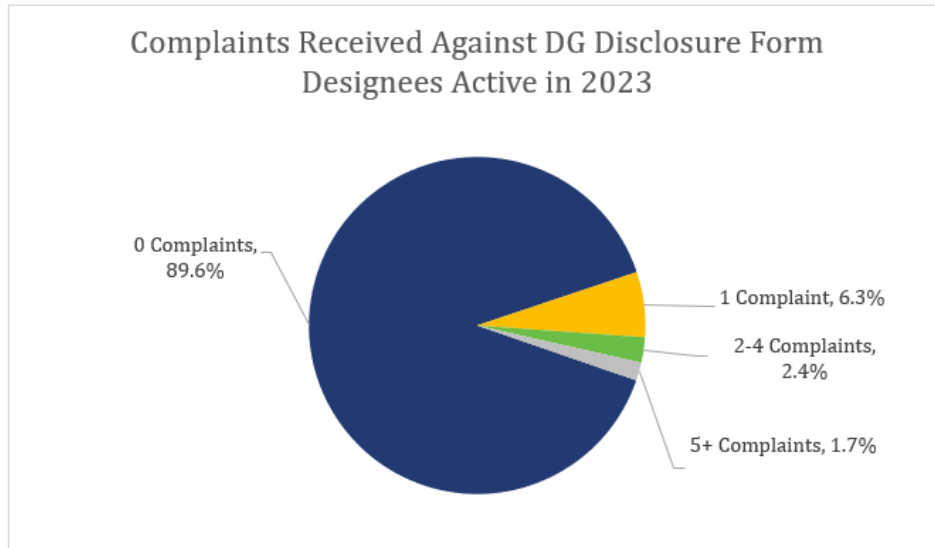
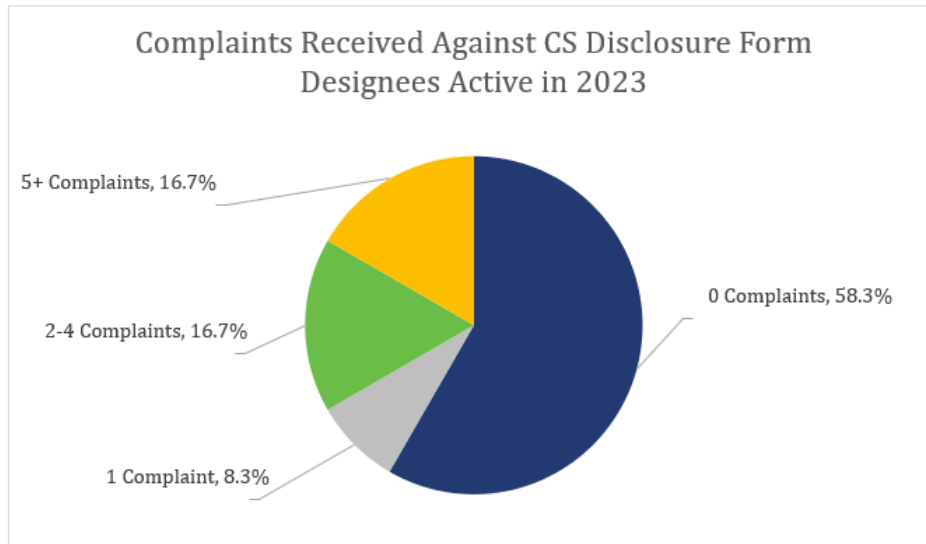


Figure 14: This chart shows all active Disclosure Form Designees, and the number of complaints received against each Disclosure Form Designee in 2023. An active Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one DG Disclosure Form in 2023. There were 288 active Disclosure Form Designees in 2023.

Figure 14 shows that 89.6% of DG Disclosure Form Designees active in 2023 did not have a formal complaint filed against them. An active DG Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one DG Disclosure Form in 2023. Additionally, 6.3% of Designees active in 2023 only had one complaint filed against them, which does not necessarily indicate a widespread issue within the company. Only 4.1% of Designees active in 2023 had more than one complaint filed against them.

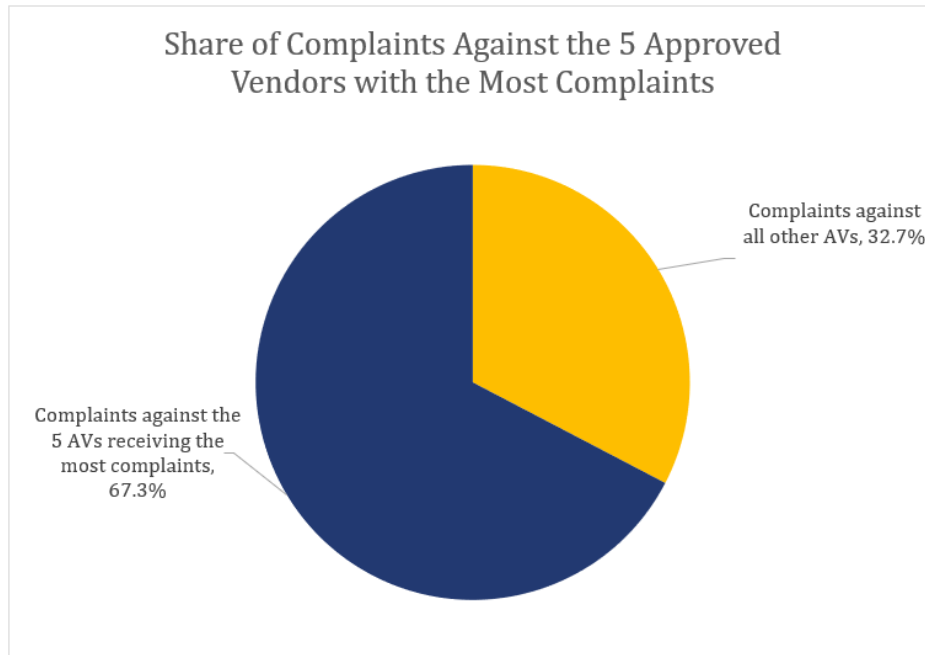
With respect to CS Approved Vendors, there were 32 active CS Approved Vendors in 2023 and the Program Administrator received only one complaint against an active CS Approved Vendor in 2023. An active CS Approved Vendor is defined as an Approved Vendor that secured a customer signature on at least one CS Disclosure Form in 2023. All other CS complaints in 2023 were lodged against CS Designees, who are responsible for most consumer interactions.



*Figure 15: This chart shows all active CS Disclosure Form Designees, and the number of complaints received against each CS Disclosure Form Designee in 2023. An active CS Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one CS Disclosure Form in 2023. There were 12 active CS Disclosure Form Designees in 2023.*

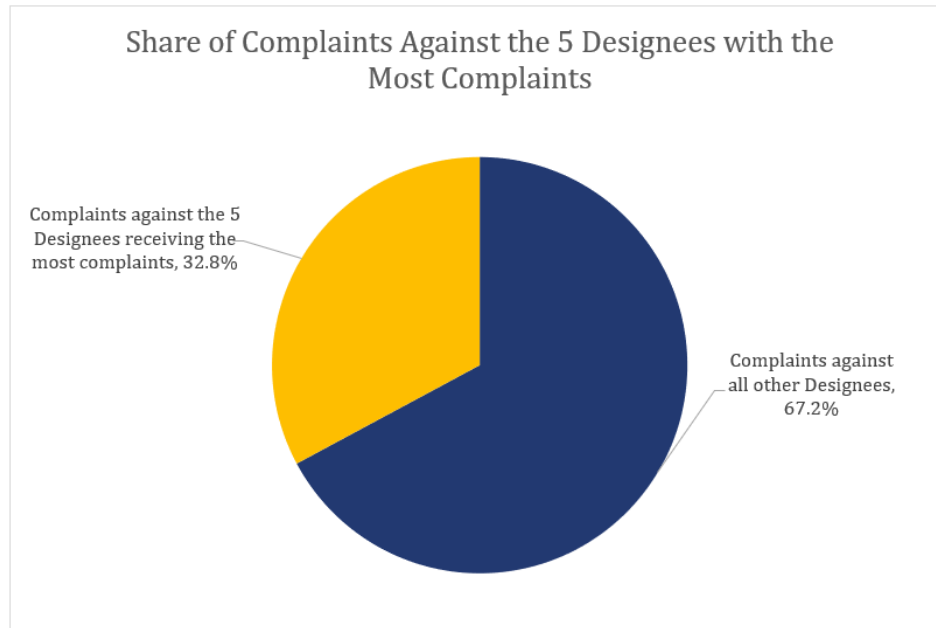
Figure 15 shows that 58.3% of CS Disclosure Form Designees active in 2023 did not have a formal complaint filed against them (an increase from 34% in 2022). An active CS Disclosure Form Designee is defined as a Disclosure Form Designee that secured a customer signature on at least one CS Disclosure Form in 2023. There were 8.3% of CS Designees active in 2023 that had only one complaint filed against them, which does not necessarily indicate a widespread issue within the company. A larger portion, 33.4%, of CS Designees active in 2023 had more than one complaint filed against them. One reason there are higher percentages observed for Figure 15 may relate to the lower number of active Disclosure Form Designees for CS compared to DG. There are only 12 active Disclosure Form Designees for CS (about one for every 2167 subscribers), while there are 288 for DG (about one for every 226 customers). Since there are fewer CS Disclosure Form Designees, there are a higher number of subscribers, and therefore potential complainants, per entity.

It is a positive sign that as the Program continues to expand in size, in terms of applications, customer base, and entities participating in the Program, the share of Approved Vendors and Designees with complaints filed against them is relatively small. This likely indicates that while there are consumer protection issues and customer service issues within the market, these issues are not widespread across all entities participating in the Program and suggests that Program requirements and consumer protection efforts may have a positive deterrent effect on problematic activities.



*Figure 16: This chart shows the share of complaints against the five Approved Vendors with the most complaints in 2023 versus the rest of Approved Vendors who received a complaint. The five Approved Vendors receiving the most complaints each had five or more complaints in 2023.*

Figure 16 shows that 67.3% of all complaints filed against Approved Vendors were filed against the five Approved Vendors with the most complaints in 2023. Complaints against all other Approved Vendors made up only 32.7% of complaints filed against Approved Vendors in 2023. The number of active DG Approved Vendors increased from 146 in 2022 to 288 in 2023. Seventeen Approved Vendors received complaints in 2022, while 19 Approved Vendors received complaints in 2023. Although there was a significant increase in the number of Approved Vendors in 2023, the percentage of complaints against the five Approved Vendors with the most complaints in 2023 (67.3%) was in a similar range to that of 2022 (72%).



*Figure 17: This chart shows the market share of complaints against the five Designees with the most complaints in 2023 versus the rest of Designees who received a complaint. Customers made ten or more complaints in 2023 about each of the five designees with the most complaints.*

Figure 17 shows that 32.8% of all complaints filed against Designees were filed against the five Designees with the most complaints in 2023. Complaints against all other Designees made up 67.2% of complaints filed against Designees in 2023.

Together, Figures 16 and 17 show that a small number of companies were responsible for most complaints received by the Program Administrator.

In this way the Illinois Shines market appears to be different from the Alternative Retail Electric Suppliers (“ARES”) market, where the majority of active ARES have complaints. In the six-month period from March 2023 to August 2023, 43 of the 69 active ARES had at least one complaint lodged against them, representing 62% of all ARES.<sup>24</sup> By contrast, only about 20% of DG Approved Vendors active in 2023 had complaints in the 12 months of 2023, and only about 10% of DG Disclosure Form Designees active in 2023 had complaints in 2023. Even with active CS Disclosure Form Designees, less than half of the Designees received any complaints.

When the Program Administrator observes a pattern of consumer protection or customer service issues from an Approved Vendor or Designee, the Program Administrator works with the company to resolve the issues. If there appears to be a potential violation of Program requirements, the Program Administrator may issue a Notice of Potential Violation and allow reasonable time for the company’s response. After an entity responds to a Notice of Potential Violation, the Program Administrator determines whether a Program violation took place and, if so, whether additional pre-disciplinary (i.e., warning letter, corrective action, compliance plan) or disciplinary action (i.e., suspension or Program removal) is warranted. See Section X.D. of the Consumer Protection

<sup>24</sup> See <https://perma.cc/U2AL-CAYL> for a permalink to the March to August 2023 ARES complaint data, and the Plug-In Illinois website (<https://www.pluginillinois.org>) for more information on ARES or for updated complaint data. Note that the Commission may track or count complaints differently than the Program Administrator.



Handbook<sup>25</sup> for a more detailed explanation of the potential consequences for Program violations. See also Section 8 of this report for a full list of all suspensions issued in 2023.

### c. Trends in 2023 Complaints Received

The Program Administrator identified several patterns and issues of note among the complaints received in 2023.

- Concerns that Designees, Approved Vendors, or unregistered companies failed to submit applications in a timely manner or portray an accurate timeframe of the application process continued to account for the largest number of complaints. Sometimes, complaints concerning a company's failure to submit a customer's application in a timely manner can indicate systemic issues with that company's operations and ability to continue in the Program. When companies go bankrupt and/or reduce or discontinue operations in Illinois, it can result in the stranding of customers, who then need another Approved Vendor to usher their application through the Program. As described below, the Program Administrator has spent significant time and resources developing a stranded customer assistance process and continues to reach out to Approved Vendors and Designees in good standing with the Program to join a shortlist of companies willing to assist stranded customers.
- While concerns about delays related to Illinois Shines applications (79) remained the top complaint topic, mechanical/installation issues had only two fewer complaints (77), and the largest percentage increase in a complaint topic concerned misleading marketing (up 7% from 2022).
- As the number of projects grew, so did the percentage of active DG Approved Vendors with more than one complaint filed against them. This number increased from 5% to 14.6% in the past year, with 9.7% having more than five complaints filed against them.
- Nonresponsiveness to customers continued to be a significant source of customer complaints as it was the primary complaint subject for 35 complaints and the secondary complaint subject for 120 complaints in 2023. (This is an increase over the previous year from 22 and 83 complaints, respectively.)
- Designees continued receiving the majority (66.1%) of the complaints while Approved Vendors received 32.2% of the complaints in 2023.

#### *Most Frequent Complaint Topic – Illinois Shines Applications Submission Delays and Market Exits*

The Program Administrator received 79 complaints in 2023 where the customer expressed concern about a delay in processing their Illinois Shines application or errors within the submitted documents. Many of the delays were caused by Designees' nonresponsiveness and/or incomplete submission of application materials to the Approved Vendor, which resulted in the application being withdrawn from the Program. Of these 79 complaints, 43 or approximately 54% were against entities that had received a warning letter in 2023 or were suspended from the Program. Additionally, about 35% of the complaints in this category were driven by entities that have exited the marketplace either by business decision or through bankruptcy, leaving behind "stranded customers." "Stranded customers" are Illinois Shines DG customers whose Approved Vendor and/or Designee has gone out

<sup>25</sup> The Consumer Protection Handbook is available at <https://illinoisshines.com/wp-content/uploads/2023/06/Consumer-Protection-Handbook-Final-4.17.23.pdf>.

of business, is unable or unwilling to meet Program requirements, or is suspended because of disciplinary action and prohibited from advancing projects through the application process. The stranded customer may be left without an Approved Vendor and/or Designee to submit application materials, causing a delay in advancing through the Program.

The Program Administrator tracks customers who have become “stranded,” and has developed a detailed process by which it takes appropriate steps to help connect these customers with a new Approved Vendor and/or Designee. The Program Administrator provides links to Program website resources<sup>26</sup> that can help the customer find a new Approved Vendor and/or Designee (including lists of Approved Vendors and Designees registered with the Program, and the link to the complaint database so that customers can use that publicly available information in selecting a company). In 2023, the Illinois Shines Program Administrator created a Stranded Customer Shortlist of registered Approved Vendors and Designees that meet heightened eligibility requirements and have indicated that they are willing to take on stranded customers. The Program Administrator maintains this list on the Program website to assist stranded customers with finding a new Approved Vendor or Designee that may be willing to complete their solar project installation and/or Illinois Shines application process.<sup>27</sup>

For non-stranded customers experiencing delays and errors in the submission of their Illinois Shines program application, the Program Administrator reaches out to the Approved Vendor and/or Designee to request information on the status of submission and an updated timeline for all submission materials to be submitted into the Program. The Program Administrator notes that in 2023, it documented an increase in the number of complaints related to delayed application submission in which the Approved Vendor misrepresented to its customers that such delays were attributable to the Program Administrator. In many of these situations, the Program Administrator’s investigation determined that the Approved Vendor had either not submitted the application to the Program or had failed to respond to the Program Administrator’s requests for information required to process the application. The Program Administrator continues to emphasize to registered entities the importance of providing accurate information to their customers, and during a 2023 Consumer Protection Working Group meeting, discussed with Program participants the importance of efficient and timely responses to information requests from the Program Administrator so that customers’ applications can continue through the application process without undue delay.

#### *Other Complaint Topics – Mechanical/Installation Issues*

Mechanical and/or installation issues comprised the primary subject for 77 of the 304 complaints filed in 2023. This represented an increase of 14 complaints compared to 2022, and a 25% overall share of 2023 complaints. Over a quarter of these complaints (18) were related to entities who had exited the market through bankruptcy and/or ceasing operations. Nonresponsiveness by the Approved Vendor or Designee was another commonality with mechanical/installation complaints. Sixty-one percent (47 out of 77) of these complaints included a secondary complaint subject regarding the Approved Vendor or Designee’s failure to respond to the customer. The Program Administrator notes that while it may have played a factor in prior years, based on feedback from stakeholders provided during an Expanded Consumer Protection Working Group meeting, supply

<sup>26</sup> <https://illinoisshines.com/find-an-av-or-designee/>.

<sup>27</sup> Pursuant to Section 7.7.1 of the 2022 Long-Term Plan, the Agency may refer customers to an Approved Vendor that is willing to take on stranded customers since many customers will not have the time, interest, or ability to find a new Approved Vendor or Designee on their own.

chain issues do not appear to have played a role in the increase of mechanical/installation complaints.

The Program Administrator continues to work with Program entities and customers to resolve mechanical/installation issues. These complaints can sometimes take the longest to resolve—particularly where it concerns issues like roof leaks—as multiple companies may need to support the resolution. Given the complexity of some of these complaints and the need for a third-party to confirm details of the alleged issues, the Program Administrator is exploring the possibility of using a third-party company to perform inspections in certain cases of alleged poor workmanship.

#### *Other Complaint Topics – Misleading Marketing*

Misleading marketing was a primary subject for 64 of the 304 complaints filed in 2023, which represents a 7% increase over the percentage of complaints alleging misleading marketing filed in 2022. Many of these complaints involved sales agents inaccurately representing to customers that they were affiliated with a utility or a government agency or program. The Program Administrator has also noticed a continuing trend of complaints regarding misleading marketing practices arising from in-person, usually door-to-door interactions, often by a Designee or Nested Designee (a Designee of a Designee).

The Program Administrator responded to this increase in complaints by increasing market monitoring efforts and issuing more Notices of Potential Violation. The Program Administrator reviews online and paper marketing materials at the time of Approved Vendor application and renewal. The Program Administrator also regularly audits marketing materials of Designees. In addition, Approved Vendors' Designee Management Plans are required to include a process for ensuring adequate training of Designee employees and agents and a process for vetting Designee marketing materials. The Program Administrator has begun requesting copies of such Designee Management Plans and giving feedback to Approved Vendors on the same to encourage improved adherence to, among other things, Program marketing requirements.

#### *Other Complaint Topics – Failure to Respond to Customers and the Program Administrator*

Failure to respond to customers was the primary subject for 35 of the 304 complaints received in 2023. While it was only the fourth highest primary complaint topic, it was the secondary subject for 120 of the 304 complaints received in 2023. This indicates that it remains a significant issue, although it was often seen in conjunction with other more substantive issues. Typically, customers do not contact the Program Administrator regarding a mechanical issue, installation issue, or delay in receiving payment from their Approved Vendor unless the customer was not able to obtain a response from their solar installer or Approved Vendor regarding the issue. Many complaints therefore involve inadequate communication or responsiveness from Designees, Approved Vendors, and in some cases, solar companies unregistered with the Program. The failure of Approved Vendors and Designees to meet deadlines set by the Program Administrator remains a leading cause for complaints to be marked as “Closed” rather than “Resolved.”

#### *Continuing Trend – Majority of Complaints Lodged Against Designees rather than Approved Vendors*

In 2023, 98 of 304 complaints received were filed against Approved Vendors, representing approximately 32% of all complaints received, while complaints against Designees (201 received)

represented approximately 67% of complaints received.<sup>28</sup> In 2022, there were also more complaints received against Designees than against Approved Vendors. Complaints against Designees represented approximately 72% of complaints received, while complaints against Approved Vendors only represented 26% of complaints received. The numbers in 2021 were similar to those in 2023 with a 65%-34% split.

In cases where there is both an Approved Vendor and a Designee (or multiple Designees) involved with a customer’s project, the customer typically interfaces more with the Designee (which is often the installer and/or sales company) than with their Approved Vendor. Often, it is the Designee that markets and explains the offer to the customer and presents the Disclosure Form and contract(s) for execution. When there is an Approved Vendor and Designee, the Designee may also be the entity that installs the project (for DG) or manages subscriptions and billing (for CS). The greater level of interaction with customers remains the likely reason for the higher number of complaints against Designees.

**d. Complaint Examples by Complaint Subject**

The complaints received by the Program Administrator in 2023 fall into nine categories: eight categories that describe the complaint subject, and a miscellaneous category for complaints that do not represent a trend in complaints received, and therefore do not fall into one of the other categories. This section summarizes a representative complaint for each of the top five complaints received by the Program Administrator in 2023, excluding the miscellaneous category. These top complaint categories represent ~90% of all the complaints received. The sample complaints were selected based on how well they exemplified the category of complaint under which they fall.

**Illinois Shines Application Issues**

<b>Complaint date:</b> December 2023
<b>Complainant Type:</b> Small DG Customer
<b>Type of Entity:</b> Designee
<b>Complaint Summary:</b> In December 2023, the customer informed the Program Administrator that its Designee had been unresponsive regarding submitting Part II application materials to their Approved Vendor. The Part I application had been verified in November 2022. The customer was concerned by the delay in having the Part II application submitted to the Program and the lack of responsiveness from their Designee.
<b>Program Administrator Response:</b> The Program Administrator notified the Designee and Approved Vendor of the complaint and requested the Designee contact the customer and provide an update regarding the progress to have the Part II application materials submitted to the Approved Vendor.
<b>Entity Response:</b> The Designee acknowledged its delay in submitting the Part II materials to the Approved Vendor and confirmed that it would prioritize the customer’s application. The Designee submitted the Part II materials to the Approved Vendor within five days of this complaint being opened. The Approved Vendor submitted the Part II application to the Program shortly thereafter.

<sup>28</sup> Complaints against entities not registered with the Program represented the final 1% of complaints received in 2023.

**Mechanical or Installation Issue**

<b>Complaint date:</b> January 2023
<b>Complainant Type:</b> Small DG Customer
<b>Type of Entity:</b> Designee
<b>Complaint Summary:</b> This project received permission to operate by the utility, but the system was not functioning. The AC disconnect was not sealed properly so there was water damage. The customer reached out to their Designee to address these issues but did not receive a response.
<b>Program Administrator Response:</b> The Program Administrator contacted the Designee and requested the Designee provide a response to the customer's installation concerns.
<b>Entity Response:</b> The Designee scheduled and performed a site visit where it was able to properly energize the system and address the water damage. The customer confirmed that their concerns were adequately addressed.

**Misleading Marketing**

<b>Complaint date:</b> March 2023
<b>Complainant Type:</b> Small DG Customer
<b>Type of Entity:</b> Approved Vendor
<b>Complaint Summary:</b> The customer was marketed free solar funded by the government and did not expect to be charged for the system. The customer filed a complaint when they began receiving monthly bills for the system from their Approved Vendor. Note: The Approved Vendor was also the sales company and installer for this project.
<b>Program Administrator Response:</b> The Program Administrator notified the Approved Vendor of the complaint. The Program Administrator requested the Approved Vendor investigate the customer's claims and work towards a resolution.
<b>Entity Response:</b> The Approved Vendor discussed this situation with the customer and agreed to modify their monthly payments to \$0/month. The customer confirmed the Approved Vendor adequately addressed their concerns.

**Failure to Respond to Customer**

<b>Complaint date:</b> December 2023
<b>Complainant Type:</b> Small DG Customer
<b>Type of Entity:</b> Approved Vendor
<b>Complaint Summary:</b> The customer's application had to be removed and resubmitted because the system size changed by more than the allowable amount between the Part I and Part II applications. The customer was concerned that they would receive their incentive payment much later than they were told to expect by their sales company. Note: The Approved Vendor was also the sales company and installer for this project.
<b>Program Administrator Response:</b> The Program Administrator notified the Approved Vendor of this complaint. The Program Administrator requested the Approved Vendor contact the customer to explain why a new application was required and address the customer's concerns about the timing of their incentive payment.
<b>Entity Response:</b> The Approved Vendor responded to the customer and Program Administrator, stating that it would make monthly payments to the customer until their incentive payment was received. The customer agreed to this resolution.

## Installation Contract Terms

<b>Complaint date:</b> October 2023
<b>Complainant Type:</b> Small DG Customer
<b>Type of Entity:</b> Approved Vendor
<b>Complaint Summary:</b> The customer stated they had signed an installation contract for 19 modules and two batteries. The Approved Vendor only installed 17 modules and one battery. Note: The Approved Vendor was also the sales company and installer for this project.
<b>Program Administrator Response:</b> The Program Administrator contacted the Approved Vendor and requested it address this discrepancy with the customer.
<b>Entity Response:</b> The Approved Vendor explained this issue was caused by a disconnect between its sales team and its installation team. The Approved Vendor agreed to install the system as specified in the installation contract and issued the customer a credit on their account due to this error.

### e. Suspension Summaries

The Program Administrator issued 39 suspensions from January 1, 2023, through December 31, 2023. (Three suspensions were overturned on appeal by the Agency.) Nine of the suspensions are related to issues first brought to the Program Administrator’s attention through consumer complaints. In each of these instances, after receiving a consumer complaint that included potential violations of Program requirements, the Program Administrator thoroughly investigated the actions of the company and confirmed the company was not in compliance with Program requirements. Out of the 304 complaints received in 2023, 77 complaints were against entities that were subsequently or already suspended by the Program Administrator based on information discovered during the investigation of consumer complaints.<sup>29</sup> Thirty entities were suspended solely for failing to submit their required annual Minimum Equity Standard (“MES”) Report.<sup>30</sup> Six entities were suspended for multiple Program violations primarily including misrepresentation and/or nonresponsiveness to customers and/or nonresponsiveness to the Program Administrator. The remaining three suspensions related to one entity failing to submit its Annual Report, one entity failing to submit its required annual Approved Vendor renewal application, and another entity marketing projects intended to be applied to Illinois Shines without properly being registered as an Approved Vendor or Designee with the Program.

Below is a summary of the suspensions of 39 entities issued by the Program Administrator from January 1, 2023, to December 31, 2023, related to customer complaints or consumer protection violations, along with information regarding any appeal decisions made by the IPA<sup>31</sup>:

<sup>29</sup> There were 20 total complaints made against entities who subsequently or already received a Warning Letter from the Program Administrator regarding Program violations.

<sup>30</sup> More details on the MES requirement can be found under the “Minimum Equity Standard” section of the Illinois Shines website’s FAQs: <https://illinoisshines.com/vendor-faqs/>

<sup>31</sup> This information is up-to-date as of the publication of this report, but as this information changes periodically, the most up-to-date disciplinary action information can be found here: <https://illinoisshines.com/violations-report-cp-complaint-report/>

**Headline Solar, LLC (“Headline Solar”)**

**Entity Type:** Approved Vendor and Designee

**Reason for Suspension:** Headline Solar failed to respond to multiple consumer complaints and the Program Administrator’s Notice of Potential Violations related to these complaints. Entity originally suspended for 3 months.

**Suspension Start Date:** November 3, 2023

**Appeal:** None filed

**Suspension Status:** Suspended (entity may not be reinstated before February 3, 2023)

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**Modern Mill LLC (“Modern Mill”)**

**Entity Type:** Designee

**Reason for Suspension:** Modern Mill was suspended for multiple reasons, including failing to comply with the Illinois Shines Consumer Protection Handbook, repeated lack of responsiveness to the Program Administrator while investigating customer complaints, failing to provide truthful and accurate information to its customers, and failing to follow the Program’s Disclosure Form requirements. Entity originally suspended for 3 months.

**Suspension Start Date:** February 22, 2023

**Appeal:** None filed.

**Suspension Status:** Suspended (entity has not satisfied reinstatement requirements)

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**Prestige Solar Solutions, LLC (“Prestige Solar”)**

**Entity Type:** Designee

**Reason for Suspension:** Prestige Solar was suspended for multiple reasons, including failing to comply with the Illinois Shines Consumer Protection Handbook, failing to provide truthful and accurate information to its customers, and repeated lack of responsiveness to the Program Administrator while investigating customer complaints. Entity originally suspended for 3 months.

**Suspension Start Date:** May 19, 2023

**Appeal:** None filed.

**Suspension Status:** Suspended (entity has not satisfied reinstatement requirements)

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**SeaSpire Advisors, LLC**

**Entity Type:** Approved Vendor

**Reason for Suspension:** SeaSpire Advisors, LLC failed to timely submit a complete Approved Vendor renewal application. The Suspension followed a Warning letter on October 13, 2023, and a Notice of Potential Violation on September 7, 2023, for the same infraction to which SeaSpire Advisors, LLC did not respond.

**Date of Suspension:** November 20, 2023

**Appeal:** None filed

**Suspension Status:** Suspended (entity may not be reinstated until February 20, 2024)

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**Simple Solar, LLC (“Simple Solar”)**

**Entity Type:** Approved Vendor

**Reason for Suspension:** Simple Solar was suspended for failing to file its 2023 Annual Report, as required by the Program Guidebook. An Approved Vendor’s Annual Report is the basis for verifying that Renewable Energy Credits (RECs) from projects are being delivered to the applicable utility. Entity originally suspended for 3 months. The Program Administrator later extended the suspension period due to the entity’s failure to timely submit its Minimum Equity Standard Compliance Plan.

**Suspension Start Date:** August 17, 2023

**Appeal:** None filed

**Suspension status:** Suspended (entity may not be reinstated before November 29, 2023)

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**Solar Ready Solutions, LLC (“Solar Ready Solutions”)**

**Entity Type:** Designee

**Reason for Suspension:** Solar Ready Solutions was suspended for multiple reasons, including failing to comply with the Illinois Shines Consumer Protection Handbook, failing to provide truthful and accurate information to its customers, repeated lack of responsiveness to the Program Administrator while investigating customer complaints, and failure to maintain business registration. Entity originally suspended for 3 months. The Program Administrator later extended the suspension period due to a failure to timely submit its Minimum Equity Standard Compliance Plan.

**Start Date of Suspension:** August 29, 2023

**Appeal:** None filed.

**Suspension Status:** Suspended (entity may not be reinstated before November 29, 2023)



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**Solis Energy Services (“Solis”)**

**Entity Type:** Designee

**Reason for Suspension:** Solis was chronically nonresponsive to the Program Administrator during complaint investigations and in response to pre-disciplinary letters. Solis failed to respond to two separate Notices of Potential Violation and a Warning letter related to its nonresponsiveness. Entity originally suspended for 3 months.

**Suspension Start Date:** December 12, 2023

**Appeal:** None filed

**Suspension Status:** Suspended (entity may not be reinstated before March 12, 2024)

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**Sun Badger Solar LLC (“Sun Badger Solar”)**

**Entity Type:** Approved Vendor and Designee

**Reason for Suspension:** Sun Badger Solar failed to submit its Minimum Equity Standard (“MES”) Compliance Plan to the Program by the June 1, 2023, deadline. Sun Badger Solar failed to respond to the Program Administrator’s Notice of Potential Violation and Warning Letter related to its failure to submit its MES Compliance Plan. Entity originally suspended for 3 months. On November 9, 2023, the Program Administrator extended Sun Badger Solar’s suspension for an additional three months due to misrepresentations to customers and nonresponsiveness both to customers and the Program Administrator.

**Suspension Start Date:** August 29, 2023

**Appeal:** None filed

**Suspension Status:** Suspended (entity may not be reinstated before February 29, 2024)

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**Ultimate Energy**

**Entity Type:** Non-Program entity

**Reason for Suspension:** Ultimate Energy violated the terms of the Illinois Shines program when it marketed solar projects on behalf of Noonday Solar without properly being registered with the Program. Ultimate Energy failed to respond to an October 11, 2023, Notice of Potential Violation on the same issue. Entity originally suspended for 6 months.

**Suspension Start Date:** December 20, 2023

**Appeal:** None filed

**Suspension Status:** Suspended (entity may not be suspended until June 19, 2024)

The following Approved Vendors and Designees were suspended on August 29, 2023, for three months for failure to comply with Minimum Equity Standard (“MES”) requirements; each entity also failed to respond to Notices of Potential Violations and Warning Letters related to this noncompliance.<sup>32</sup> None of the below suspensions are related to customer complaints.

Entity Name	Status
5 Star Solar, LLC (“5 Star Solar”)	Suspended
Advanced Energy Innovations LLC (“Advanced Energy Innovations”)	Suspended
Ark Master DG Solar CEI, LLC (“Ark Master”)	Suspended
Astrum Solar Inc. (“Astrum Solar”)	Suspended
B and J Construction	Suspended
Chrono Pop LLC (“Chrono Pop”)	Suspended
Distributed Generation and Storage LLC (“Distributed Generation and Storage”)	Suspended
Ehbed Consultants LLC (“Ehbed Consultants”)	Suspended
Fosler Construction Company, Inc. (“Fosler Construction”)	Suspended
Greenbacker Renewable Energy Corporation (“Greenbacker”)	Suspended
Gritstone Professional Services, LLC. (“Gritstone”)	Suspended
Illinois Current, LLC (“Illinois Current”)	Suspended
InterUrban Solar, Inc. (“InterUrban Solar”)	Suspended
MC Power Companies, Inc. (“MC Power Companies”)	Suspended
Miacomet Solar, LLC (“Miacomet Solar”)	Suspended
National Solar Energy	On September 29, 2023, the IPA rescinded this Suspension on appeal by National Solar. The IPA reasoned that the Program Administrator had sent the underlying Warning Letter and Notice of Potential Violation to an old/unused email address for National Solar. Approved Vendor status maintained.
Primergy Solar (Illinois) LLC (“Primergy Solar”)	Suspended
RER Energy Group LLC (“RER Energy Group”)	Suspended
Rivers Edge Solar LLC (“Rivers Edge Solar”)	Suspended
SGC IL DEVELOPMENT ONE LLC (“SGC IL Development One”)	Suspended
Solar America Group LLC (“Solar America Group”)	Suspended
Solar Star Always Low Prices IL 2019, LLC (“Solar Star Always Low Prices IL 2019”)	Suspended

<sup>32</sup> The below list excludes Simple Solar, Solar Ready Solutions and Sun Badger Solar – all of whom were suspended both for failing to timely submit an MES Compliance Plan as well as specific consumer protection-related Program violations. These entities are instead included in the section directly preceding this list.

SOLAR STAR HD ILLINOIS, LLC (“SOLAR STAR HD ILLINOIS”)	Submitted September 12, 2023. Granted September 19, 2023. The Illinois Power Agency (“IPA”) granted the appeal because the Notice of Potential Violation and Warning Letter were sent to an out-of-date email address for Solar Star Prairie Holding. Solar Star Prairie Holding had previously provided an updated email address to the Program Administrator, which was not used when sending the Notice of Potential Violation and Warning Letter. Approved Vendor status maintained.
Solar Star Prairie Holding, LLC (“Solar Star Prairie Holding”)	Submitted September 12, 2023. Granted September 19, 2023. The Illinois Power Agency (“IPA”) granted the appeal because the Notice of Potential Violation and Warning Letter were sent to an out-of-date email address for Solar Star Prairie Holding. Solar Star Prairie Holding had previously provided an updated email address to the Program Administrator, which was not used when sending the Notice of Potential Violation and Warning Letter. Approved Vendor status maintained.
Solgen Power LLC (“Solgen Power”)	Suspended
Strong's Marketing Group, LLC (“Strong's Marketing Group”)	Suspended
Sunrise Illinois, LLC (“Sunrise Illinois”)	Suspended
Tatleaux Illinois Solar, LLC (“Tatleaux Illinois Solar”)	Suspended
Timberlyn Lighting Management, Inc. (“Timberlyn Lighting Management”)	Suspended
Trusted Energy	Suspended

## 5. Illinois Solar for All Complaints and Analysis

### a. ILSFA Consumer Complaint Data Summary

In 2023, the ILSFA Program Administrator received 16 customer complaints. This was a slight increase from 13 complaints received in 2022. The ILSFA Program Administrator received seven complaints in 2021<sup>33</sup> and six complaints in 2020. The 16 complaints were against two Approved Vendors (Sunrun and Nelnet) and related to the Residential (DG) Program. These two Approved Vendors also have the largest number of completed residential projects in the ILSFA program with a combined total of 106 out of 127 projects. As the ILSFA program grows each year in terms of number of projects and participants, an increase in complaints can be expected. As mentioned previously, and similar to Illinois Shines, a complaint can be filed not only during marketing or installation, but at any

<sup>33</sup> This is a correction from the 2021 report that stated there were 13 complaints in 2021; the complaint type table shows the corrected data. As we set standard complaint categories this year, six complaints that were reported in 2021 were actually in the inquiry/request category and will not be included as complaints moving forward.

time during the following years. This open-ended time frame for complaints to be received by the Program makes it possible for the pool of possible complainants to accumulate because a customer could sign a contract in 2020 and then file a complaint in 2023. This leads to an expected increase in potential complaints.

**i. Complaints Received – By Complaint Subject**

The Program Administrator tracks the subject of each incoming complaint. The subject categories of complaints have been modeled similarly to the Illinois Shines program where appropriate. Additional categories are added as new complaints arise or are created because the ILSFA program has different requirements than the Illinois Shines program and new trends may develop. The complaints received in 2023 were categorized under five topic areas, with the last category being new in 2023: (1) Failure to respond to customer, (2) Mechanical or installation issue, (3) Provided insufficient customer service, (4) Miscellaneous, and (5) Failure to screen for income eligibility. Failure to screen for income eligibility is an example of a new category specifically for the ILSFA program since the Illinois Shines Program does not have income requirements. Under the Consumer Protection Handbook, Approved Vendors that participate in both Illinois Shines and ILSFA must be able to adequately screen customers for eligibility to participate in ILSFA.

Like the previous year, in ILSFA, the most common complaints were about Approved Vendors failing to contact interested participants and providing insufficient customer service. Examples of insufficient customer service include providing updates to their customer in an inconsistent and untimely manner.

Details regarding the complaints received<sup>34</sup> by category can be found in the table below. Nine categories are included, as complaints were received in prior years in additional categories not relevant in 2023.

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<sup>34</sup> For the year 2023 and previous years the Illinois Shines and ILSFA programs did not use the same determination factors to categorize incoming customer calls as complaints. The differences between the Programs being primarily between the labeling of an inquiry versus a complaint or issue. Going forward there will be alignment between both Programs regarding the intake process to categorize and document complaints.

Complaint Subject	Description	2020	2021	2022	2023	Total
ILSFA application issues	The customer is concerned about errors their Approved Vendor made with their ILSFA application, or with a delay in the Approved Vendor submitting the application.			1		1
Failure to respond to customer	The customer has not received an adequate response from their Approved Vendor or Designee to a customer question or concern.	3	3	3	6	15
Issues related to contract terms	The customer is concerned about the terms of their installation contract, their financing agreement, etc.			1		1
Mechanical or installation issue	The customer is concerned about an issue with a physical component of their system (i.e., panel, inverter, microinverter, etc.), or reports property damage as a result of the installation.			2	3	5
Miscellaneous	A complaint that does not fit any of the other categories on this list.	1			1	2
Misleading marketing	The customer reports that they received misleading information related to expected benefits of the Program from the Approved Vendor.			1		1
Provided insufficient customer service	The customer reports lack of sufficient customer service (i.e., aggressive sales tactics, receiving insufficient program information, inconsistent or lack of communication, etc.)	2	4	5	4	15
Failure to screen for income eligibility	The customer is concerned they were not screened for income eligibility for the ILSFA Program.				2	2
<b>Total</b>		<b>6</b>	<b>7</b>	<b>13</b>	<b>16</b>	<b>42</b>

Figure 18: This table shows the number of complaints received by the Program Administrator for each subject category of complaint for the years 2020, 2021, 2022, and 2023 with cumulative totals by subject, year and overall.

## ii. Complaints Received – Against Approved Vendors

In 2023, complaints were received against two Approved Vendors—Sunrun and Nelnet (formerly GRNE). These Approved Vendors are both the sales and installation company and work with the customer throughout the entire ILSFA process. These two Approved Vendors in combination have completed 83% of the residential projects in the ILSFA program to date. See the table below for

complaints received against Approved Vendor by calendar year. A separate category is listed at the end of the table for complaints against entities not registered with the Program.

Approved Vendors	2020	2021	2022	2023	Total
Sunrun Installation Service Inc	1	2	3	9	15
Nelnet (formerly GRNE Solutions LLC)		1	3	7	11
Windfree Wind and Solar Energy Design Company	2		1		3
Nexamp Solar LLC	1	1	1		3
ComEd Give-A-Ray			2		2
Trajectory Solar, IL LLC	1	1			2
StraightUp Solar LLC		1	1		2
Xolar Renewable Energy			1		1
Advanced Energy Solutions Advanced Energy Solutions Group Inc		1			1
<b>Non-Program Entity</b>					
Kapital Electric Company			1		1

Figure 19: This table shows how many consumer complaints were filed against each company throughout the life of the Program. If a solar company or Program entity is not listed here, it means that the Program Administrator has never received a formal complaint against that company. Companies are organized in this table according to their role in the Program. "Non-Program Entity" is defined as an entity that is not registered as an Approved Vendor or as a Designee with the Program

### iii. Complaints Received – By Complaint Status

The ILSFA Program Administrator currently has four status types for complaints. The status types are:

- **New:** The complaint has been received and recorded but review or investigation has not begun.
- **In Progress:** The complaint is currently being reviewed or investigated.
- **Resolved:** The complaint has reached a resolution with the customer and all parties involved have been notified.
- **Closed:** The complaint has not reached resolution, but no further action can be taken, and all parties involved have been notified.

In 2023, 13 complaints were Resolved and three were Closed. The majority of complaints were resolved with the Approved Vendor contacting the customer and providing additional information or clarification. Nine complaints were Resolved within 30 days. An additional six complaints were Closed or Resolved within 70 days; with four of these, the customer's delay in following up or deciding to pause the investigation led to additional time. The remaining complaint was Closed in 227 days due to the complicated nature of the complaint and because the customer paused the investigation for a period.

Status	Approved Vendor	Complaint Subject	Program Type	Date Complaint Opened	Date Complaint was Resolved or Closed
Resolved	GRNE	Provided insufficient customer service	Residential	1/30/2023	2/9/2023
Resolved	Sunrun	Mechanical or installation issue	Residential	2/7/2023	2/24/2023
Resolved	Sunrun	Failure to respond to customer	Residential	2/22/2023	3/16/2023
Resolved	Sunrun	Provided insufficient customer service	Residential	3/1/2023	4/3/2023
Resolved	Sunrun	Provided insufficient customer service	Residential	3/7/2023	3/27/2023
Resolved	Sunrun	Failure to screen for income eligibility	Residential	3/10/2023	4/5/2023
Closed	Sunrun	Mechanical or installation issue	Residential	3/13/2023	5/20/2023
Resolved	GRNE	Failure to respond to customer	Residential	3/15/2023	4/7/2023
Resolved	GRNE	Failure to respond to customer	Residential	3/19/2023	5/23/2023
Closed	Sunrun	Mechanical or installation issue	Residential	4/4/2023	11/17/2023
Closed	Sunrun	Failure to screen for income eligibility	Residential	5/16/2023	6/30/2023
Resolved	GRNE	Provided insufficient customer service	Residential	6/6/2023	7/19/2023
Resolved	Sunrun	Failure to respond to customer	Residential	6/8/2023	6/30/2023
Resolved	GRNE	Failure to respond to customer	Residential	8/15/2023	8/24/2023
Resolved	GRNE	Delay/failure to pass through Renewable Energy Credit ("REC") payment	Residential	9/17/2023	11/1/2023
Resolved	GRNE	Failure to respond to customer	Residential	12/19/2023	12/20/2023

Figure 20: This table shows the status of each complaint received in 2023 listed by Approved Vendor, subject category of complaint, Program type, date the complaint was opened and closed or resolved, and an ID number.

### b. Trends in 2023 Complaints Received

As previously mentioned, with the growth of the ILSFA program, there has been a slight increase in the number of complaints. As the program grows, specifically in the Residential sub-program, Approved Vendors are working with more participants, which establishes a larger pool of possible complainants. Also, with the increase of projects in the Residential program, more complaints are based on issues that occur further along the ILSFA project process after projects have been completed and energized.

## 6. Conclusion

Consumer protections are a fundamental element of both Illinois Shines and Illinois Solar for All. By tracking customer complaints, the Agency and Program Administrators are better able to understand market behaviors, potential gaps in Program requirements, and opportunities to address new trends or consumer protection concerns. The publication of complaint information, including visualizations and analysis, creates transparency for customers, companies, and other stakeholders. The Agency's 2024 Long-Term Renewable Resources Plan includes additional information on consumer protection measures, including the Agency's plans for new consumer protection initiatives to address consumer complaints and other program violations.