



September 6, 2024

Illinois Power Agency
105 W Madison Street, Suite 1401
Chicago, IL 60602

RE: Stakeholder Feedback Request: Updating Distributed Generation (“DG”) Disclosure Forms for Supply-Only Net Metering

Palmetto Solar LLC (“Palmetto”) appreciates the opportunity to supply comments to the Illinois Power Agency (“Agency”) as it considers important revisions to the DG Disclosure Forms in light of upcoming changes to net metering in the State. Our limited comments focus on the transition process between the DG Disclosure Forms currently available and the updated DG Disclosure Forms being contemplated by the Agency.

I. Background

The DG Disclosure Forms have been a staple consumer protection measure under the Adjustable Block Program/ Illinois Shines (“Program”) since its launch on January 30, 2019. Over this time, the DG Disclosure Forms have gone through several minor and major revisions that have impacted the language, formatting and functionality of the DG Disclosure Forms. The Agency is now contemplating further revisions in response to upcoming changes in net metering, as defined in Public Act 102-0662. As the Agency considers further revisions to the DG Disclosure Forms, we strongly encourage applying lessons learned from prior revision processes to inform a transition with as little impact on industry and applicants as possible.

II. No Gaps in DG Disclosure Form Availability

Given the success and growing awareness of the Program amongst industry and the public over the past five years, a significant percentage of annual DG deployments in the State ultimately enroll in the Program. To facilitate consistent, efficient enrollments Approved Vendors (“AVs”) and Designees have designed internal and consumer-facing processes that incorporate Program and Consumer Protection requirements. This is particularly true for the DG Disclosure Forms which Palmetto and many other Program participants issue to customers via the Disclosure Form API functionality.

Section V.A.1 of the current Consumer Protection Handbook, effective June 1, 2024 states, “the Approved Vendor or Designee must provide the completed standard Disclosure Form, and the customer must sign that Disclosure Form, *before* (emphasis added) the customer signs a contract.” Disruptions in the availability of the DG Disclosure Forms or critical tools that enable efficient use of those forms, can have material impacts on participating entities and their ability to issue customer contracts necessary to conduct business.



On April 12, 2024 the Program provided additional details¹ on the closure of the Program from May 27 - June 3, 2024 in order to facilitate the end of the 2023-2024 Program Year and the beginning of the 2024- 2025 Program Year. The Program clarified that, “all Portal functions, including the ability to submit Part I project applications or to download or submit Disclosure Forms (in all forms and manners including API, CSV, PDF), will be unavailable during this period”. Without a way to access DG Disclosure Forms, Program participants across the State were unable to compliantly contract with new prospective customers, leading to significant market and customer confusion.

We implore the Agency and the Program Administrator to manage future transitions involving the disclosure form, including this transition contemplated for January 1, 2025, in a manner that does not restrict access to the DG Disclosure Forms necessary to contract with new prospective customers.

III. Effective Date of New DG Disclosure Forms & Formal Guidance

In the Agency’s August 21st Stakeholder Feedback Request, the Agency clarified that it “plans that the new Disclosure Forms will be available starting January 1, 2025.” While this provides insight into when the new disclosures will become available, it does not clarify when the new disclosures will be required to be used by all Program participants. With such significant changes being contemplated and the likelihood for technical revisions by the Program and participants to ensure API and CSV functionality, sufficient transition time should be afforded. We would strongly encourage the Agency to permit a transition period of at least *thirty days* from the date that final versions of the DG Disclosure Forms and the associated CSV and API functionalities are made available to Program participants.

Further, to promote an orderly transition in the market, the Agency and the Program Administrator should consider hosting a webinar or developing a guideline that addresses the changes made to the DG Disclosure Forms, the effective date that the new DG Disclosure Forms will be enforced and a decision matrix.

We greatly appreciate the opportunity to provide feedback to the Agency and look forward to continuing to participate in the DG Disclosure Form update process.

Respectfully submitted,

/s/ Daniel Pertwee

Manager, Policy & Markets

Palmetto Solar LLC

1616 Camden Rd #300

Charlotte, NC 28203

Email: [REDACTED]

¹<https://illinoisshines.com/year-end-program-closure-updated-mes-submission-materials-and-supplemental-guidance-stakeholder-feedback-published/>



August 22, 2024

Ag Technologies, Inc.
Approved Vendor ID #336
1268 East 100 South
Rochester, Indiana 46975
www.solarcam.us
574-224-8324

Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, Illinois 60602
IPA.Solar@illinois.gov

SUBJECT: Ag Technologies, Inc. – Stakeholder Feedback on DF Updates

Illinois Power Agency,

This letter serves as official feedback on the Illinois Shines Standard Disclosure Form update for supply-only net metering. Responses to the requested feedback are listed below, respectively.

FEEDBACK ITEM 1: Changes to User Inputs into the Portal

We find that the proposed changes are acceptable and the information to be input is already being gathered or can be granted access to by the customer.

FEEDBACK ITEM 2: Changes to Calculations in the Portal

We prefer to use both actual, historic data and data estimates of site energy use. Actual, historic data usage can be input and if the customer expects to construct an addition this estimated usage could be input. In another example, we would use estimated energy use on a new construction site.

FEEDBACK ITEM 3: Changes to Calculations in the Portal Continued

The approach proposed seems fine. We would prefer the option to toggle off the estimate of the value of savings for ARES customers. Only because some customers will only provide small snips of utility information for privacy. We would likely toggle off this option in that case.

FEEDBACK ITEM 4: Preferable Approve to Provide Clear Information to Customers of a Municipality or Rural Electric Co-Operative.

We prefer the toggle option. It is beneficial to remove the Unavailability of Net Metering Credits Form and reduce the number of forms needing reviewed and signed by the customer. However, it is sometimes time consuming and difficult to find the correct crediting available in the relevant jurisdiction since they sometimes fluctuate. We prefer to use an average state-wide retail rate and

average state-wide supply rate, with blended 55%, 75%, and 95% rates. We believe this will reduce the chance of input error.

FEEDBACK ITEM 5: Acceptable Level of Granularity

We find that the proposed level of granularity is acceptable when comparing apples-to-apples. Increasing the level of granularity might confuse the customer and create margin for error when inputting.

FEEDBACK ITEM 6: Changes to Disclosure Form PDF Presented to Customer

For Proposed Change 1, having a toggle switch to remove this section if there is not a battery streamlines the view of the Disclosure Form and reduces the number of fields needing input. If there is a battery, the requested information is fine and should be addressed.

For Proposed Change 2, the language is fine as proposed. We do believe the fine print is likely to be overlooked and it would be more likely for the customer to see the offset percentage disclosed in this section. The proposed location is fine.

Proposed Change 3 is fine as proposed.

FEEDBACK ITEM 7: Proposed Change 4

We prefer to have the toggle option in the event that the customer opts out of the rebates. If the customer opts for the rebates we find that having the battery and the inverter rebates shown on separate lines or as a single line are both valuable options. A single line streamlines and simplifies the Disclosure Form. While have them separated provides detail that requires less explanation.

Thank you for the opportunity to provide feedback. We look forward to serving our customers through this upcoming change.

Ag Technologies, Inc.
Approved Vendor ID #336

Thank you for the opportunity to provide comment to the IPA on updating the DG Disclosure Forms for Supply-Only Net Metering.

Please accept these comments on behalf of the Illinois Municipal Utilities Association (IMUA). The IMUA is a nonprofit service organization that represents Illinois municipalities that own and operate public utility systems, of which there are 42 municipally owned electric utilities in Illinois.

Feedback Item #4

With regards to Feedback Item #4, we concur with your recommendation for the disclosure form to include a section in which the Approved Vendor or Designee provides a short explanation of the type of crediting available in that jurisdiction. Each municipal electric utility is committed to ensuring residential and small commercial customers can install renewable generating facilities, self-generate electricity and receive appropriate credits for electricity not used onsite. Illinois law recognizes that municipal systems and electric cooperatives may reasonably implement different policies than investor-owned utilities (220 ILCS 5/17-900). As such, not all policies are identical and the option to include a summary of the appropriate crediting policy in the relevant jurisdiction is appropriate.

Illinois municipal electric utilities are still vertically integrated. Therefore, they have a bundled rate that includes both supply and delivery. There is not a separate “supply” line item on a customer bill. As such, a municipal utility either offers full retail net metering, or in its place the local municipal governing body has developed a policy to calculate a credit that is similar to the “supply” rate offered by an investor-owned utility.

Due to these differences, we agree with your recommendation to include a short explanation of the type of crediting available rather than a generic average state-wide retail rate and supply rate.

Feedback Item #9

With regards to Path 2 in Feedback Item #9, we refer to our previous statement that Illinois municipal utilities have a bundled rate that does not have a separate “supply” rate. However, each municipal electric utility has a rate that they credit for excess solar (electricity not used onsite and is sent back to the local distribution system), hence this could replace the “supply” rate. Therefore, we would recommend the following change:

- Residential and small commercial customer’s average supply net metering credit rate for energy not used onsite and sent back to the local distribution system over the past 12 months

Feedback Item #10

In order to best estimate the percentage of electricity used directly onsite, we would recommend the automatic calculator allow for the input of at least one year of monthly historical kWh usage for the customer and compare that to the estimated production levels of the proposed solar array to produce an automatic calculation of how much energy would be used on site by month. This would ensure accuracy, rather than a vendor needing to develop an estimate of the percentage of electricity used directly onsite.

Thank you for your consideration. We are available for any questions.



Sunnova Energy Corporation

20 Greenway Plaza, Suite 540

Houston, TX 77046

sunnova.com

Illinois Power Agency

105 w Madison Street, Suite 1401

Chicago, IL, 60602

September 6, 2024

Sunnova appreciates the opportunity to provide feedback on the proposed changes to Illinois Shines and Illinois Solar For All distributed generation disclosure forms. Founded in Houston, Texas in 2012, Sunnova is a leading adaptive energy services company. Sunnova has a network of independent dealers and more than 430,000 customers across 51 U.S. States and Territories.

Sunnova appreciates that the use of standardized assumptions and calculations can be a tool for consumers to use in comparing offers from solar and storage providers. However, Sunnova understands and wishes to confirm that the standardized assumptions and calculations required in the disclosure are not intended to prohibit a provider from supplying to consumers other reasonably based non-misleading calculations and assumptions.

Additionally, Sunnova proposes that the disclosure include language informing consumers that there may be other reasonable assumptions and calculations and that solar and storage providers may share those assumptions, calculations, and projections based on those assumptions and calculations, outside of the mandated disclosure form, provided they are reasonable and not misleading. Sunnova suggests that official language to this effect will help avoid the erosion of consumer confidence that might otherwise occur if providers share additional estimates and consumers are not informed that the practice is permissible.