

Rationale Document:

2026-2027 Program Year Document Update

Consumer Protection Handbook

Contract Requirements

Stranded Customer REC Adder Categories

April 24, 2026

On March 4, 2026, the IPA released a draft of the 2026 Consumer Protection Handbook, Contract Requirements for the 2026-27 Program Year, and an updated version of the Stranded Customer REC Adder Categories. The IPA provided stakeholders the opportunity to submit feedback until March 20, 2026. Several stakeholders submitted feedback on the proposed changes, and the Agency has carefully reviewed and considered this feedback. This rationale document provides an overview of the final changes to these documents, discusses the stakeholder feedback received by the Agency, and explains the Agency’s final decisions with respect to the updates. The Agency did review and consider all stakeholder comments, although not every issue raised in comments is discussed below.

Overview of Updates to the Consumer Protection Documents*Consumer Protection Handbook*

Updates in the 2026 Consumer Protection Handbook include:

- Updates to Solar Restitution Program caps, in accordance with the 2026 Long-Term Renewable Resources Procurement Plan;
- A new definition of customer to clarify scope and applicability of various initiatives and processes;
- Modified requirements related to marketing of the Federal Investment Tax Credit, based on changes to federal policy (*see discussion below*);
- A new requirement to provide periodic updates to Community Solar customers when their assigned project has not yet been energized (*see discussion below*);
- Updates related to how Disclosure Forms are signed, including explicitly prohibiting sales agents from helping customers access email accounts and requiring sales agents to explain to customers how e-signed documents can be accessed (*see discussion below*); and

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- A prohibition on retaliation against customers for filing complaints with the Program Administrator.

Contract Requirements

Updates to the Illinois Shines and ILSFA Contract Requirements for PY 2026-27 include reorganizing and reformatting of the requirements to increase clarity and flow, and clarifying requirements. Pursuant to stakeholder comments, the Agency is removing the requirement to provide the subscription size in community solar contracts (*see discussion below*).

Stranded Customer REC Adder Categories

The updated version of the Stranded Customer REC Adder Categories consolidates categories with the same REC adder value and also makes clarifications to address minor inconsistencies. Please note that in the redline version published for stakeholder feedback, the text in the Notes column for the new #9 category was inadvertently not marked as new. The Agency is not adding an additional category at this time, but will continue to explore and consider ways to help stranded customers (*see discussion below*).

Consumer Protection Handbook*Marketing and the Federal Investment Tax Credit*

The Consumer Protection Handbook updated language regarding marketing that mentions the Federal Investment Tax Credit (“ITC”) in light of the phase-out of the ITC. One comment stated that “the tax credit remains one of the primary incentives customers consider when evaluating solar” and requested “examples of acceptable explanations” about the ITC. Given that the federal ITC is not available for customer-owned solar projects put in service after December 31, 2025, and the ITC for third-party owned projects would be claimed by the third-party owner, the Agency does not see a need for sample language marketing the ITC.

Sales Agent Assistance with Customer Email Access

The Agency proposed expanding the existing requirement in Section V.A that sales agents may not facilitate the creation of an email account for a customer to also prohibit sales agents from “assist[ing] the customer with accessing their email account.”¹ While some stakeholders supported the new requirement, others expressed concern that this

¹ The Agency also expanded the requirement to include a prohibition on sales agents “send[ing] the Disclosure Form to the sales agent’s own email account.” The Agency only received supportive feedback on this additional requirement, so it is not discussed here.

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requirement was overly stringent and asked that the Agency clarify what would constitute acceptable technical assistance if a customer is unable to log into their email account.

The Agency acknowledges that the new requirement may lead to the more frequent use of hardcopy documents. It also recognizes that the majority of sales representatives may not have malicious intentions when they assist customers with technical issues such as browser or connectivity issues, locating the website where the customer may log into their email, and/or helping the customer set up an email. However, if a customer does not have the technical expertise to access their email account without assistance from the sales agent, the Agency believes that electronic signing is not appropriate for that customer. For example, the customer may not be able to access the email account in the future in order to locate and read documents sent to that account, such as the Disclosure Form or solar contract, and may similarly not receive related notices.

Given these considerations, the Agency will maintain the prohibition on sales agents providing technical assistance of any kind to customers when customers are attempting to access their email accounts. If a customer is unable to access their email account or does not have an email account, the sales representative must discontinue the sale or provide paper copies of all documents to the customer.

Additional Suggestions and Feedback

Some stakeholder feedback included proposals for requirements that are already in effect. For example, one suggestion was to require Nested Designees that do in-person marketing to undergo the same training as Approved Vendors and Designees. This training is already required under Section VII, which states that “Each Approved Vendor or Designee shall ensure that individual representatives that engage in in-person solicitation and telemarketing . . . on behalf of that Approved Vendor or Designee receive appropriate training prior to interacting with customers on the Approved Vendor’s or Designee’s behalf.” The Consumer Protection Handbook’s use of the term “Designee” includes both “parent” and “Nested” Designees. Another suggestion was to implement a 24-month publication period for Warning letters on the Illinois Shines website for entities that have had their status revoked. The Agency notes that if an entity has its status revoked, it will receive a Revocation letter, which is different from a Warning letter. Although the Agency currently publishes Warning letters for only 12 months, any suspensions or revocations are published on the website permanently.

Next, there were several stakeholder suggestions that the Agency finds to be overly burdensome on Program participants at this time. For example, a stakeholder suggested that the Program prohibit sales representatives from having customers sign a Disclosure

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Form or contract during the initial door-to-door visit. Although this requirement could help reduce instances of predatory practices where customers feel excessive pressure to enter contracts (or are potentially deceived into entering a contract), the requirement would necessitate significant changes to existing vendor business practices. Similarly, another stakeholder suggestion would require sales representatives to include the trade name and logo of every company related to the transaction on their ID badges during customer interactions. Given the diversity of business models in the Programs, it would be challenging to determine exactly which vendor logos need to be included on any given badge, and numerous logos may actually create confusion. In addition, one sales representative may work for multiple Designees and Approved Vendors. At this time, the Agency does not find that the benefits to consumers outweigh the burden to vendors of complying with this requirement.

The Agency also declines to create more stringent requirements for status updates to community solar subscribers who have been assigned to a community solar project that has not yet been activated. The notice requirement for these customers is new in the 2026-27 Consumer Protection Handbook. The Agency will monitor the impacts of the new requirement but at this time believes that the burden of monthly updates would outweigh the consumer protection benefits.

A commenter also suggested that the Program develop quantitative thresholds for identifying patterns of issues, with corresponding escalating enforcement actions. While the Program Administrator does monitor trends across the Program and for individual vendors, and issues escalating responses for patterns of violations, it would be very difficult to set quantitative thresholds for specific responses. There is a wide range of possible Program violations, of differing severity and impact on consumers and the Program. Even different instances of the same “violation,” such as misrepresentation or poor workmanship, may differ in severity. In addition, the vendors that participate in the Program can be very disparate in terms of size, type or scope of work within the Program, and business model. Because of these variables, the Agency believes that case-by-case disciplinary determinations may be necessary. However, the Agency also notes that the Illinois Shines Program Administrators is making updates to its information systems to enable data reports related to pre-disciplinary and disciplinary letters and determinations, which should improve the Program’s ability to identify patterns, and the Agency will continue to consider whether numeric thresholds may be feasible and/or useful.

Lastly, there were several stakeholder suggestions that related to broader aspects of Program implementation. The Agency will continue to consider and potentially implement these suggestions in future Program changes, but it finds that these suggestions are beyond

ILLINOIS POWER AGENCY

the scope of this round of document updates. For example, one suggestion involved proposed categories for future phases of the Solar Restitution Program (“SRP”). The Agency is considering these suggestions in its planning for the next phase of the SRP and notes that it will seek additional feedback on the next phase of the SRP in the coming months. Another suggestion was for the Agency to include a separate registration category for entities that provide financing services. In accordance with the 2026 Long-Term Plan, which was approved in early 2026, the Agency will seek additional information from Approved Vendors and Designees regarding their relationships with financing entities in the coming months. Once that information is collected, the Agency may implement additional changes to Program entity registration and requirements. Finally, a stakeholder suggested that the Agency evaluate the effect of the sunset of the Investment Tax Credit on consumer outcomes. The Agency agrees that changes to federal law will have effects on solar market trends and consumer outcomes, and it will continue to evaluate the consumer protection impacts of these changes. However, the Agency does not find that additional changes to Program documents related to this issue are necessary at this time.

Contract Requirements*Community Solar Subscription Size*

The Agency received feedback on the proposed updates to the Illinois Shines and ILSFA Contract Requirements from three entities. Two commenters expressed support for the reorganization and reformatting of the Contract Requirements. Two commenters opposed the proposal to require community solar subscription contracts to include the subscription size and estimated production, noting that this information is already included in the Disclosure Form and inclusion in the contract could cause difficulties and limit flexibility around right-sizing subscriptions. The Agency understands these concerns and has removed the proposed requirements from the Contract Requirements.

REC Adder Categories*Proposed “Administrative Stewardship” Category*

One stakeholder requested that the Agency create a new “Administrative Stewardship” category for the stranded customer REC adder. Under this proposed category, an Approved Vendor would agree to take assignment of a defunct Approved Vendor’s master REC contract as a “last resort” attempt to unstrand the defunct entity’s customers and ensure delivery of its promised RECs. The proposal recommends that in exchange for taking this assignment, the new Approved Vendor would receive the Low REC adder value but have no obligation to deliver the RECs to the utility. Instead, the new Approved Vendor would attempt to sign new contracts with the defunct entity’s stranded customers to ensure

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delivery of the RECs. The Low REC adder value would compensate these efforts, even for projects where the new Approved Vendor is unsuccessful in obtaining a new contract. Where the new Approved Vendor is successful in obtaining new contracts, the customers would then receive the High or Very High REC adder value over time, as the RECs generated by their projects are delivered to the utility, minus the Low REC adder value already paid to the new Approved Vendor.

The Agency does not plan to implement this proposal in this update to the stranded customer REC adder, in part because it would require an amendment to the REC contract. However, the Agency appreciates the concerns that gave rise to this proposal and believes that they warrant further consideration. The Agency will continue to explore ways to assist stranded customers through its various initiatives.