

Carbon Solutions SREC

# Designee Management Plan

Jun 1, 2024

This plan provides a structured approach to supervising Designees in the Illinois Adjustable Block Program (ABP) to ensure compliance with both Carbon Solutions SREC (CSS) and Program requirements. Carbon Solutions SREC will conduct an annual review and update this plan each June 1st, with additional revisions as necessary.

CSS mandates that all Designees review this plan, and sign the Designee Attestation Form as acknowledgement of their understanding of their responsibilities as Designees of CSS and participants of the Adjustable Block Program.

## Step 1: New Designees

### ***Screening Process for Potential New Designees***

Prior to entering into new partnerships with designees, CSS will vet potential partner companies by reviewing their online Reviews and any ABP complaints or suspensions made against the Designee to assess their potential liability as a partner.

### ***Designee Identification and Good Standing Status***

CSS will request new designees to provide all names under which their company and affiliate companies are registered. Additionally, the Designee must possess an ICC Certification, and provide an active ICC Docket number for their company and customer-facing affiliate companies, as an Installer Designee. The Designee must also provide to CSS a Certificate of Good Standing from the State of Illinois.

### ***Designee and Sub-Designee Registration Requirements***

All Designees must register and annually renew their registration with the Program. The Designee is responsible for providing all training materials and certifications demonstrating that employees have been trained in accordance with Program requirements and cover all applicable sections of the Illinois Power Agency's [Consumer Protection Handbook](#). All sub-designees or nested designees, i.e. any third-party hired by a direct Designee who has "interaction with end-use customers of Illinois Shines" (p.38 of the ABP Guidebook), are required to register with the Program. To register a sub-designee, the [Designee Registration form](#) must be completed by the sub-designee and submitted to the Program Administrator.

## **Marketing Materials**

Designees must provide CSS with a copy of all sales contracts, example marketing materials, and links to marketing sites. CSS may review these materials for any potential consumer protection violations. All marketing and sales materials must adhere to all consumer protection requirements set out by the Program. The DG sales contract must meet [the program's requirements outlined here](#).

## Step 2: Designee Onboarding and Understanding the Application Requirements

### **Application Timeline Review and Attestation**

Designees must sign an attestation affirming their understanding of the application process timelines, as well as the required documents and processes for each stage of the application process.

### **ABP Application Timeline**

*General timeline:* 12-18 months for the full application process

*Part 1 submit & cure period:* 1-3 months

*Part 1 verification:* 1-3 months

*ICC approval:* 2-4 weeks

*GATS Registration:* 7-14 days

*Part 2 submit & cure period:* 1-3 months

*Part 2 verification:* 1-3 months

*Approval to payment:* 3-3.5 months

*All timelines are estimates, fluctuate based on program demand, and are subject to change at any point. Note - this timeline includes CSS's review time, and may differ from other Approved Vendors.*

### **Disclosure Forms and Installer ABP Training Passing Grade**

Designees must complete a test Disclosure form to demonstrate their understanding of the Disclosure Form process, which they must then provide to CSS.

Designees are required to take and pass the [Designee ABP Training](#) provided by CSS. They may be required to review the training with a CSS onboarding employee to address any miscomprehension.

## Application Process

### Part 1

#### 1. *Required documentation*

- Installation contract (signed by both installer and customer)
- Plot Diagram
- Shading study
- Net metering waiver (if utility/co-op does not offer net metering)
- Signed Interconnection Agreement for systems over 25 kW AC
- Other documentation as requested by CSS or the Program Administrator

#### 2. *Disclosure forms*

Designees are required to generate and complete a Disclosure form signed by the customer using the ABP portal. The Disclosure form must be completed after the project's design and before the customer's signing of an installation agreement or REC contract. All information provided must be accurate and true.

#### 3. *Online monitoring access*

Designees are required to provide online monitoring access and related information to CSS within 50 days of installation, and to ensure that the customer has granted access as well.

#### 4. *Expansions and co-location*

Designees are required to make known of any expansion or co-located projects. It is important to provide all requested information for expansions/co-locations in a timely manner as there are often delays with invoicing by 1-3 months for these types of projects. Co-located systems will receive a REC price for the size of both systems at the time of the second system's application. If the second project is submitted more than 2 years after the initial project's ICC approval date, this price adjustment does not apply. If the project has been built and interconnected at the time of the project's application, the interconnection date must be 2 years after the ICC approval of the original system in order to avoid this REC price adjustment (p. 51-54 of ABP Guidebook).

*The documentation listed above is not comprehensive and additional documents may be required. These requirements are also subject to change.*

### Part 2

#### 1. *Required documentation*

- Online monitoring access
- COC/PTO that has been the customer's name and/or address, is dated and signed by a utility representative



- Net metering approval from utility that states customers name or address, or a recent utility bill in the customer's name
- a photograph of the make and model for both system's the inverter and production meter
- photos of all constructed arrays for the project
- Other documentation as requested by CSS or the Program Administrator

## 2. *Meter requirements*

Systems 10kW AC and smaller are required by the Program to utilize a production meter or inverter that is accurate to +/-5% (inverter must have digital or web-based monitoring display).

Systems larger than 10kW AC and smaller than 25kW AC are required to utilize a revenue grade production meter that meet ANSI C.12 standards.

Systems 25kW AC and larger are required to utilize a production meter that not only meets ANSI C. 12 standards, but is also new (not refurbished). A photo of the meter make and model are required in order to submit a Part 2 application.

## 3. *Prevailing Wage and Certified Transcripts of Payroll*

All commercial projects are required by law to adhere to the IPA Act's prevailing wage. Exceptions to the prevailing wage law include residential projects and houses of worship whose project is smaller than 100kW AC. Designees are required to provide Illinois Certified Transcripts of Payroll (not transcripts from the US DEpartment of Labour).

## 4. *Demographic Information*

Designees are required to provide accurate and truthful demographic information about their project workforce.

*The documentation listed above is not comprehensive and additional documents may be required. These requirements are also subject to change.*

## **Additional Requirements**

Designees will attest to understanding the following requirements related to the application process:

### 1. *Waitlists*

Designees are expected to understand the waitlist process for small and large DG projects and to effectively communicate these timelines and expectations with their customers.

### 2. *Transfer of contract with sale of property*

In the event that the sale of a system occurs, CSS maintains all rights to RECs generated following this sale. The current REC contract will be transferred to the new system owner, and any remaining collateral will be returned to the new system owner at the end of the contract. If the Designee becomes aware that a mutual customer has sold their home/system, or has become deceased, the Designee is required to alert CSS via email within 30 days of becoming aware.

3. *Designee badge ID numbers*

Individuals interfacing with customers possess an official badge which includes their name, an employee ID number and a company logo.

### ***Minimum Equity Standard Requirements***

All Designees must adhere to the Illinois Shine's Minimum Equity Standard, which mandates that 10% of an entity's workforce be Equity Eligible Persons (EEPs). This requirement is expected to be increased in future program years. Additionally, all Designees are obligated to submit a compliance plan, mid-year review, and end-of-year-report to the Program according to the specified deadlines for each document. Further details regarding the Minimum Equity Standard Requirements can be found [here](#).

## **Step 3: Monitoring Designee Enrollment**

Designees will undergo vetting procedures outlined in this plan, and must sign an installer agreement with CSS before being submitted to the ABP.

Onboarding with both CSS and the ABP will follow a sequential process:

1. Designee will submit a [Designee Registration Form](#)
2. Designee will submit all applicable marketing materials to CSS for review
3. Designee will sign the installer agreement with CSS
4. Designee will review the CSS's customer contract and sign timeline attestation
5. Designee will be granted access to the portal (and will input all marketing links). Should any issues arise with a Designee, designee status and/or portal access may be withdrawn at any time.

## **Step 4: Monitoring Designee Training of Employees and Agents**

### ***Designee Internal Training Materials***

The Designee is required to provide CSS a copy of their internal training processes and code of conduct related to any SREC activities (including marketing and sales). Should these documents not currently exist, CSS reserves the right to request the

Designee to establish formal procedures, demonstrating their commitment to becoming a CSS partner Designee.

### ***Carbon Solutions SREC Designee Training***

Designees (including all applicable employees that are customer facing or involved in submitting documents to the ABP admin or CSS) are required to attend a designee webinar training session hosted by CSS, review the [CSS ABP Overview and Portal Training webinar](#) recording, and complete [CSS's ABP Training](#). This Training will encompass all ABP related knowledge necessary for success as a Designee, as well as how to use the ABP portal, CSS portal, and all necessary documents and requirements needed to process applications.

Designees must also undergo [Sales and Marketing Training](#) which covers Disclosure Forms, application costs and fees, Group A and B REC pricing disparities, REC quantities, Consumer Protection practices, and communication guidelines.

## Step 5: Monitoring Designee Marketing Materials

Designees must provide all ABP related scripts, channels, and marketing materials to CSS. They are required to complete the initial Designee registration form, where marketing links will be collected. A CSS employee will then record before portal access will be granted to the Designee. Additionally, Designees are required to add all marketing links into the CSS portal.

Designees are responsible for reviewing the Program Guidebook and Consumer Protection Handbook to ensure that all marketing materials accurately adhere to the guidelines set forth in these documents before making any changes or additions. If unsure, the Designee must contact CSS or the Program to confirm the accuracy of the information.

Unless explicit permission is given, the Designee is required to provide all marketing materials to CSS for approval before dissemination.

## Step 6: Check-ins and Communication between CSS and its Designees

### ***Required Communications***

Designees may be required to attend weekly, bi-weekly or monthly calls with CSS, as necessary and agreed upon. These meetings will facilitate the review of high-priority tasks and applications, and act to highlight any issues or delays regarding the

application process and project statuses. Designees are required to answer all Program and application related inquiries to ensure the prompt progress of projects.

Designees are advised to stay alert for CSS's, the Illinois Power Agency, and the ABP Admin's email blasts containing important updates, links and resources.

### **Quality Assurance**

If a designee demonstrates a pattern of failing to meet Program requirements during the application process, such as providing insufficient information or documentation, or failing to answer to tasks delegated through the CSS portal, the Designee may be flagged for an internal audit. This audit will result in a temporary pause in processing the Designee's applications. An internal review where the Designee will be given a specified timeframe to provide the required documentation for projects before processing resumes.

## **Step 7: Monitoring Designee Updates on Material Changes and Business Practices**

Designees are required to communicate via email to CSS any material changes to their business practices in advance of action. Designees must notify CSS of the following changes:

1. A change to the Designee's business name
2. If the Designee is halting or introducing a new service (i.e. selling or installing)
3. If the Designee is bringing on a new subcontractor to their business (sub-designee enrollment, training and badging process)
4. If the Designee is commencing sales with a new company
5. If the Designee is exiting the industry or ABP market
6. If the Designee is declaring bankruptcy

## **Step 8: Submission of Application Materials Deadlines**

### **Required Documents Timelines**

Designees are required to submit project application materials to CSS in a timely manner, and must respect the following timeframes:

1. Within 30 days of design finalization, the Designee must submit all required Part 1 documents.
2. Within 60 days of a system's Permission to Operate, the Designee must submit all required Part 2 documents.



3. Online monitoring access must be provided to CSS within 60 days of system installation.

### ***Specific Partner and Utility Timelines***

Partner specific timelines may be re-determined on a case-by-case basis, and specific utility timelines may be discussed and implemented in the same manner.

## **Step 9: Reporting Customer Complaints, and Designee Violation of Program Requirements and Designee Management Plan**

### ***Designee's Process for Reporting Customer Complaints***

In the event that a Designee receives a customer complaint, they will agree to notify CSS no later than 10 business days after receiving the complaint. The Designee is required to submit all complaints via email to [srec@carbonsolutionsgroup.com](mailto:srec@carbonsolutionsgroup.com).

The Designee will then have no longer than 10 business days to respond back to any communication from CSS regarding the complaint. Failure to respond to this communication within the allotted time will result in an internal flag to a CSS manager, and the appropriate actions will be taken towards the Designee.

A high volume of customer complaints will result in an re-assessment of the Designee's partner status with CSS, and may result in an internal audit of the Designee's projects statuses and internal practices.

### ***Procedure for Violation of Program or CSS Requirements and Designee Management Plan***

Should a Designee violate any Program or CSS requirements, the following steps may be taken towards the Designee by Carbon Solutions SREC:

1. The Designee may be subject to a modified fee structure in which fees increase based on the volume and severity of violations.
2. The Designee may be required to start paying to CSS a monthly or annual partnership fee to prove the Designee's intent to improve their performance and comply with the Program and CSS expectations.
3. The Designee may be required to attend additional training and meetings with CSS during an agreed upon "probationary" period to monitor and resolve any shortcomings identified through an audit of project applications. If this process fails to ensure the Designee has begun to adhere to all necessary requirements, CSS will issue a notice of intent to terminate the partnership. During the 60-day period, the Designee may demonstrate improved

performance to potentially have the termination notice rescinded. CSS may alert the Program Administrator of the notice of termination, and may request for the suspension of the Designee's ability to create new Disclosure Forms.

*Response to Program and CSS violations is not limited to the above steps, and additional punitive actions may be taken by CSS in response to the severity of the violation.*

### ***Additional Information***

1. Page references from the ABP guidebook are based on the ABP Guidebook at the time of writing this plan, and are subject to change in future versions.
2. Timelines listed in this DMP are subject to change without notice in the future.
4. Requirements in this DMP are not exhaustive, but are meant to highlight the most important components of the ABP. All partners are expected to meet ABP Requirements as well as any other applicable local, state, and federal, rules and regulations.
5. ABP Documentation, Guidelines, notices and other program information information are maintained by the ABP Admin and located on <https://illinoisshines.com/> and/or in emails sent out by the program admin.

## Designee Attestation Form

“ \_\_\_\_\_ (designee name), including all employees and sub-designees, attests to understanding and complying with the following:

1. Attests that all installations completed in Illinois have been, and will be, performed by an ICC Certified DG installer.
2. Attests that all Designees and customer facing sub-Designees, including but not exclusive to operations and maintenance and sales and marketing entities, are actively registered with the ABP, and will continue to renew their registration as required.
3. Attest to fully comply with all Illinois Shines Consumer Protection requirements as outlined in the Consumer Protection Handbook and the ABP Program Guidebook.
4. Attests to notifying CSS within 10 business days of a customer complaint being received, and attests to taking no longer than 10 business days to respond to CSS communications regarding the complaint.
5. Attests to respond to all communications from CSS within 10 business days of receiving communications (unless an Out of Office notice has been received) , and to attend all meetings requested by CSS.
6. Attests to fully understanding all parts of the Application Process, estimated timelines and DG waitlists. It is acknowledged that failure to provide adequate documents or complete necessary tasks, such as the signing of Disclosure, signing of REC contracts and payment of invoices and Certified Transcripts of Payroll, will result in applications not being submitted to the Illinois Shines.
7. Attests to understanding and complying with the Program's requirements for Designees to adhere to Illinois' prevailing wage, providing Certified Transcripts of Payroll when necessary, as well as complying with all Minimum Equity Standards and providing accurate and truthful demographic information for all projects.
8. Agree to participate in all audits/performance reviews that CSS facilitates.
9. Agree to accept consequences outlined in plan, such as monetary fines and the additional fee structures, as well as any other punitive action taken by CSS in response to violations of Program and CSS partner obligations.
10. Attests to understanding all of the Program's system meter requirements, including revenue grade meter requirements of ANSI C.12 for systems above 10kW AC.
11. Attests to understanding co-location and expansion REC pricing, and to effectively communicate this with respective customers.
12. Attests to understanding that CSS is not responsible for changes in ABP incentive amount due to program rule changes, violations, incorrect or incomplete information provided by designees, or other program rulings.
13. Attests to understanding how the AC Size impacts the customer's REC quantity, in particular how an AC size decrease from Part 1 to Part 2 decreases REC quantity proportionally, irrespective of any change or non-change in DC kW Size.

By signing this document, the designee confirms the accuracy and truthfulness of all provided information. The designee acknowledges full comprehension of the requirements and expectations established by both Carbon Solutions SREC and the Adjustable Block

Program, as delineated in this Designee Management Plan, the IPA's Consumer Protection Handbook (<https://rb.gy/t3nhcf>), and the Illinois Shine's Program Guidebook (<https://rb.gy/qzzh6k>).

Signed by: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_