

Consumer Protection Principles

SEIA is committed to strong consumer protection for Americans who invest in solar and storage. For the solar and storage industry to realize its full potential as an American economic engine, and provide Americans with competitive power choices, customers must fully understand solar transactions and companies must hold themselves to the highest ethical standards and business practices. Equally important to the customer experience, any and all delays in inspections and approval from utilities and Authorities Having Jurisdiction (AHJs) should be minimized. These principles should be coupled with other SEIA Principles, such as the Rate Design Guiding Principles for Solar Distributed Generation.

Clear Contract Terms for Customers

It's critical for customers to understand the terms of their contracts before signing. Contracts must be written in legible font and in clear language, be structured in a way that is easy to understand and avoid unclear or deceptive spacing or layout. Material terms should be prominently placed in the contract.

To aid customers, solar contractors should provide a short and simple standardized disclosure that includes the key terms of the contract such as contract length, payment schedule, and financing terms, if applicable. SEIA provides solar contractors with a standard disclosure form.

Warranties

Solar panels are designed to last for many decades and are low-maintenance, two factors that help make them a great investment. To help ensure that customers get the full value of their solar over the system's lifetime, customers should be offered comprehensive service and product coverage. Warranties provided to customers should include a clear statement of coverage under the warranty and the obligations of the installation company, equipment manufacturer, and customer.

Cooling Off Period

Federal and state law mandate a cooling off period for home solicitations. All customers making investments in home improvement should be provided with a cooling off period of at least 5 business days after contracts are signed. Within the cooling off period, customers must be able to cancel their contract without penalty.

Fair Lending Practices

Any companies providing customers with financing options are responsible for complying with all applicable state and federal lending laws and regulations, including the Equal Credit Opportunity Act, which prohibits discrimination on the basis of race or color, religion, national origin, sex, marital status, age, the applicant's receipt of income derived from any public assistance program, or the applicant's exercise, in good faith, of any right under the Consumer Credit Protection Act, the Truth in Lending Act, and the Unfair, Deceptive or Abusive Acts or Practices Act.

Salesperson Training and Conduct

Well-trained sales personnel, whether an employee or independent contractor, are best positioned to help the customer find the best solution for their energy needs. Solar contractors are responsible for training sales personnel in their company's Code of Conduct, solar and storage technology, relevant policy, and how to comply with applicable law. In all interactions with customers, sales personnel should clearly introduce themselves, identify the company on whose behalf they are selling, both orally and in the contract. Sales personnel should provide customers with sales presentations, materials, proposals, and contracts in their preferred language.

Accountability for Bad Actors

Solar companies or sales personnel that repeatedly do not comply with existing consumer protection laws or Codes of Conduct should be held accountable, including by regulators with the proper authority or by their trade associations including being removed from membership.

Good Faith Dispute Resolution

While uncommon, disputes may arise. Existing laws govern dispute resolution in most cases and should be relied upon. As a general principle, during a good faith dispute resolution there should be due process for all parties and clear definitions of terms, including what constitutes a "good faith" effort.

Timely and Clear Permitting and Interconnection Process

Certain aspects of the solar customer experience depend on institutions and processes beyond the control of solar installers and customers. AHJs and utility rules and timelines for permitting and interconnection have a large impact on a customer's ability to go solar and experience throughout the process. Unclear processes and long wait times can create a bad customer experience and delay adding clean energy to the grid. All AHJs should have a clearly defined permit process, timeline estimates, and project tracking functionality on their website and should adopt online, automated permitting (such as SolarAPP+) to reduce permitting wait time and free up staff to review permits for more complex projects.

Utilities should have a clearly defined interconnection process, along with required information and samples, on their website to ensure uniform and transparent procedures. Utilities should have a mandated interconnection deadlines and penalties (not recoverable from ratepayers) should be applied to utilities and paid to the interconnection customer if the required interconnection timeline is not met. Utilities should utilize technologies like smart inverter functions to reduce the need for costly upgrades and avoid unnecessary delays and studies.

Customers' Right to Generate and Consume Their Own Power

Consumers must maintain the right to generate and consume their own power. Customers that generate or store their own power through rooftop solar or battery storage should not be regulated as utilities and should always be able to self-consume the energy that they generate. Utilities cannot charge customers for the energy that the customer generates and consumes, and utilities cannot require that customers export the energy that they generate to the grid.

Legacy Status for Customers

While policies and regulations may change over time, existing solar and storage customers should be granted legacy status to the extent the new policy would change the economics to the customer's detriment. Solar customers are making investments that benefit all ratepayers and support the grid. Providing existing customers with legacy status for policies such as net metering can give customers stability in investment decisions and regulatory certainty when deciding whether to go solar.

Transparency with Consumer Complaints

Collaboration between government, industry, and other stakeholders is critical. Agencies responsible for consumer protection or attorneys general should provide information about consumer complaints on a disaggregated and anonymized basis when requested by solar trade associations or other relevant stakeholders. Providing solar trade associations with information about customer complaints can create an avenue to revamp practices, provide additional training to solar companies, and/or create new standards to prevent future customer complaints. Knowing the type and volume of complaints will only help the solar industry improve.