

DEVELOPER BROCHURE

This document has been prepared by Community Solar Representatives (CSR) to provide developers, program administrators, utilities, and industry partners with a clear understanding of our enrollment capabilities, compliance standards, and operational approach. Community solar programs operate within regulated environments, and participating successfully requires a disciplined process, accurate qualification, and a respectful approach to customer education. This brochure outlines how CSR supports those expectations.

Inside, you will find detailed information on how CSR trains its representatives, verifies eligibility, manages documentation, and aligns with program rules and developer requirements across multiple states. The content is structured to be both informative and easy to reference, whether the reader is reviewing compliance procedures, operational methods, or partnership expectations.

This document is intended for decision makers, compliance reviewers, operational leads, and partnership teams evaluating subscriber acquisition partners. We welcome discussion and clarification on any portion of the material and look forward to the opportunity to support responsible, scalable program participation.

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Executive Overview & Partnership Framework

Supporting the responsible expansion of community solar through accurate enrollment, regulatory alignment, and dependable partnership practices.

1.1 Introduction to Community Solar Representatives

Community Solar Representatives (CSR) is a dedicated subscriber enrollment partner focused on accurate, compliant, and program-aligned community solar enrollments. We work with community solar developers, program administrators, and utilities to ensure that residential customers are properly qualified, clearly informed, and enrolled under the rules that govern each individual program.

CSR operates with the understanding that community solar is not a generic retail offer. It is a structured, policy-based program with eligibility criteria, consumer protections, documentation requirements, and verification steps that must be followed consistently. Our work is built around that reality.

1.2 Our Role in Community Solar Programs

CSR's role is to connect eligible households with community solar opportunities in a way that respects:

- State policy objectives
- Program design and rules
- Developer-specific stipulations
- Utility billing and verification processes

We do not simply bring interested customers to a program. We ensure that the customers we enroll:

- Meet eligibility criteria
- Provide acceptable verification documentation where required
- Understand the key terms of participation

 Are submitted in a format that is ready for review, activation, and long-term participation

1.3 Partnership Philosophy & Value to Developers

CSR views every developer relationship as a partnership. Our goal is to reduce friction, not create it. That means:

- Fewer incomplete enrollments
- Fewer avoidable rejection or correction cycles
- Fewer unclear expectations with customers
- Less strain on internal developer and program staff

We align with developer processes instead of expecting developers to adapt to us. This includes adapting to:

- Required documentation formats
- Preferred reporting structures
- Submission timing and batching
- Program goals and pacing

1.4 Positioning Statement

CSR is a compliance-grounded, professionally trained enrollment partner that helps developers scale community solar participation while protecting program integrity and supporting operational efficiency.

Regulatory Framework & Program Governance

Understanding the policies, oversight structure, and compliance standards that shape responsible enrollment practices.

2.1 The Role of Regulation in Community Solar

Community solar programs are built on state-level policy and regulatory frameworks designed to expand renewable access while protecting consumers. Enrollment activity, therefore, must follow clear rules and documentation standards so that participation reflects the intent of those policies.

CSR approaches every program with the understanding that:

- Regulatory requirements are central, not optional
- Documentation and process are part of compliance, not just administration
- Customer protection is a core feature, not a marketing message

2.2 Oversight Entities & Their Responsibilities

While each state is different, community solar typically involves several key actors:

- **Public Utility Commissions (PUCs):** Establish and oversee program rules, including consumer protections and complaint processes.
- **State energy or climate agencies:** Guide program design, LMI structures, and performance reporting requirements.
- **Program administrators / third-party entities:** May manage day-to-day program operations, including enrollment review and LMI validation.
- **Utilities:** Validate customer information, manage billing integration, and ensure that subscriptions align with system capacity and account status.

CSR structures its processes to work cleanly within these frameworks rather than around them.

2.3 State-Level Variation Across CSR's Active Markets

CSR currently operates in:

- Colorado
- New Mexico
- Minnesota
- Maine
- Massachusetts
- New York
- Delaware
- New Jersey
- Illinois

Each of these states has its own program design, administrative structure, and documentation expectations. CSR does not assume that processes from one state can simply be copied into another. Instead, we build state- and program-specific guidance for our teams and maintain clear distinctions in training and enrollment procedures.

2.4 Enrollment Requirements & Compliance Expectations

Across CSR markets, compliance expectations include:

- Delivering required disclosures to customers in clear, accessible language
- Confirming that eligibility criteria are met and documented where required
- Handling customer data securely and consistently
- Submitting complete, legible, and accurate enrollment information

CSR embeds these expectations into training, review procedures, and documentation workflows so they are part of everyday practice, not after-the-fact checks.

2.5 CSR's Commitment to Regulatory Integrity

CSR does not reinterpret or relax program rules. We follow the requirements as they are written by regulators, program administrators, and developers. When requirements are updated or clarified, we update our internal training, field guides, and quality control steps accordingly.

If a situation is unclear, our representatives are instructed to escalate and seek guidance. Assumptions are never treated as an acceptable substitute for documented rules.

SECTION 03

Low-to-Moderate Income (LMI) Enrollment Expertise

Ensuring accurate, documented, and compliant participation in income-qualified community solar programs.

3.1 LMI in Community Solar Policy (80% & 150% AMI)

Many community solar programs include specific carve-outs or requirements for low-to-moderate income (LMI) customers to ensure equitable access to clean energy. These programs often reference income thresholds such as:

- 80% of Area Median Income (AMI)
- **150% of AMI**, where broader eligibility is permitted

CSR understands that LMI enrollment is not just about signing up customers who "seem" to qualify. It requires:

- Clear understanding of the income thresholds
- Accepted documentation paths
- Program-specific rules for how eligibility is established and maintained

Our representatives are trained to treat LMI enrollment as a compliance process, not just an offer detail.

3.2 Verification Pathways & Accepted Documentation

CSR uses any verification methods that the state, program administrator, or developer allows, and we train our teams to understand exactly which documentation is acceptable in each context.

Common LMI verification methods include, where allowed:

- Benefits award or approval letters (e.g., SNAP, LIHEAP, Medicaid, WIC, SSI and other assistance programs)
- Tax documentation (where permitted)
- Paystubs or income statements
- Confirmation of enrollment in utility low-income rate programs
- Other documentation explicitly accepted by the program or developer

We emphasize:

- Clear copies: documentation must be legible, complete, and capture all required information.
- **Appropriate recency:** when applicable, we follow the recency standards set by the program.
- **Eligibility mapping:** representatives are trained to understand which forms of assistance tie into income eligibility categories.

3.3 CSR's In-House Verification & Developer Validation Workflow

CSR verifies LMI eligibility in-house based on the documentation and rules allowed by each program. This includes:

- Reviewing documentation for completeness and clarity
- Confirming that the documentation matches the customer's identity and the eligibility criteria
- Ensuring that the type of documentation matches program requirements

Once CSR has completed its internal review, documentation is sent to the developer or program administrator for final validation and record-keeping. This two-step approach:

- Reduces the likelihood that developers will receive incomplete or clearly non-qualifying submissions
- Helps maintain a high acceptance rate for LMI enrollments
- Supports clear audit trails when documentation is reviewed or rechecked later

3.4 Fraud Prevention, Audits & Documentation Quality Control

CSR maintains a cautious and structured approach to fraud prevention. Our practices include:

- **Duplicate verification checks:** ensuring the same documentation is not reused inappropriately across unrelated enrollments.
- **Document authenticity review:** confirming that documents appear consistent with expected formats, dates, and identifying information.
- Random audit sampling: periodically re-reviewing a selection of enrollments to confirm adherence to procedures.
- **Rep education:** ensuring that representatives understand both permitted documentation and clear red flags.

Our goal is straightforward: protect program integrity while making the enrollment process clear and respectful for customers.



Developer Stipulation Compliance & Enrollment Accuracy

Aligning enrollments with program-specific rules to prevent avoidable rejection, rework, and delay.

4.1 Understanding Developer Program Rules

Beyond state-level requirements, each developer often has its own set of program stipulations. These rules exist to protect project performance and portfolio quality, and they can significantly impact enrollment outcomes if not followed carefully.

CSR takes these stipulations seriously and treats them as core requirements, not "nice to haves." Our enrollment process is built around applying each developer's rules consistently, including:

- Eligibility criteria specific to the project
- Documentation preferences and formats
- Billing and account standards
- Geographic or utility-specific constraints

4.2 Common Stipulations That Affect Eligibility & Activation

CSR actively screens for a range of common developer and program stipulations that frequently determine whether an enrollment is accepted or rejected. These include:

- Minimum average monthly bill thresholds
- Utility arrearage or back balance limits
- Account holder name matching between the utility account and the enrollment
- Service address validation and service-territory qualification
- Multi-unit qualification rules (e.g., apartments, duplexes, or shared meters)
- Ownership vs. renter classification, where required

- **Utility rate class** (such as residential vs. commercial)
- Third-party energy supplier stipulations, which can impact eligibility in several states

By checking these factors before submission, CSR aims to prevent enrollments that would predictably fail during utility or developer review.

4.3 CSR's Stipulation Matrices, Field Guides & Ongoing Support

Representatives are not expected to rely on memory alone. CSR provides:

- **Printed field guides** summarizing program rules and stipulations in a clear, accessible format
- Extensive training materials that break down rules by developer, state, and utility
- Regular weekly meetings where stipulations are reviewed, clarified, and updated based on recent experiences and program changes
- Daily access to leadership and support staff for questions when a representative is uncertain

We are constantly working to keep our team current and confident so they can apply each developer's requirements accurately in the field and remotely.

4.4 Preventing Incomplete & Incorrect Enrollments

CSR understands why many enrollments in the industry are delayed or rejected: small details are missed. To counter this, we:

- Use checklists that incorporate both program and developer stipulations
- Require representatives to verify key criteria before submitting an enrollment
- Encourage escalation rather than guessing when something is unclear
- Conduct internal reviews to identify patterns of confusion and address them in training

The result is fewer incomplete files, fewer preventable rejections, and a smoother process for developers and customers.

Representative Training & Certification Standards

Ensuring that every representative is prepared, tested, and aligned with program requirements before enrolling customers.

5.1 Training Philosophy & Objectives

CSR believes that high-quality training is the foundation of accurate, compliant enrollment. Our goal is to ensure that every representative:

- Understands the programs they represent
- Knows how to read and interpret utility bills
- Can apply program rules and developer stipulations correctly
- Communicates clearly and respectfully with homeowners

We take pride in how our representatives carry themselves and how they represent both CSR and our developer partners in the field and remotely.

5.2 Initial Training Program (1-2 Week Onboarding)

On average, CSR training lasts **one to two weeks** before a representative is cleared to enroll customers. During onboarding, we cover:

- Community solar basics and state-specific frameworks
- LMI structures and verification processes
- Developer program rules and stipulations
- Utility bill structure and key fields used in eligibility review
- Enrollment walk-throughs from introduction to submission
- Data handling, privacy expectations, and secure documentation practices

Training is not just informational. It is practical, scenario-based, and focused on real-world enrollment situations.

5.3 Testing, Certification & Field Clearance Requirements

Before any representative is allowed to enroll customers, they must pass internal tests on:

- Program rules for the markets they will work in
- Required disclosures and compliance language
- LMI verification procedures and acceptable documentation
- Specific developer requirements and stipulations
- Utility bill reading and interpretation
- End-to-end enrollment flow

Only after successfully completing these tests and practice enrollments is a representative cleared for the field or remote enrollment work.

5.4 Ongoing Training, Refreshers & Quarterly Recertification

Training is not a one-time event at CSR. We maintain:

- **Biweekly training sessions and refreshers:** to review updates, clarify recurring questions, and reinforce best practices.
- Quarterly meetings and recertification: where representatives go through more
 extensive review and training to ensure they remain aligned with current program
 requirements and developer expectations.

These sessions also include time to review any issues that may have occurred in the prior period and to workshop solutions so the same problems do not recur.

Market Deployment & Operational Model

Providing flexible, state-specific deployment with a consistent standard of enrollment quality.

6.1 Active States & Market Footprint

CSR is currently active in the following states:



- New Mexico
- Minnesota
- Maine
- Massachusetts
- New York
- Delaware
- New Jersey
- Illinois

Our teams are trained with state-specific guidance to ensure that each market is approached with the proper understanding of program design, stipulations, and utility practices.

6.2 Deployment Model: Hybrid In-Person & Remote

CSR deploys teams using a **hybrid model**:

- **In-person outreach:** Representatives meet with homeowners at their residences or in community settings to explain programs, review utility bills, and complete enrollments.
- **Remote support and enrollment:** In appropriate contexts, CSR can verify information and assist homeowners remotely, using secure digital documentation processes.

This flexibility helps CSR serve different geographies, customer preferences, and project types while maintaining the same standards of accuracy and compliance.

6.3 Workforce Structure & Field Management

CSR's workforce is mixed but **primarily independent contractors**, supported by internal leadership, training, and operations staff. We manage performance and quality through:

- Training and certification controls
- Clear expectations for compliance and documentation
- Data-backed performance review
- Structured communication channels between field teams and leadership

Our focus is on building and maintaining a team that reflects professionalism and reliability in every interaction.

SECTION 07

Customer Journey & Ongoing Support Approach

Creating clear, informed, and supported experiences for enrolled customers.

7.1 Customer Enrollment Journey Overview

The typical CSR-guided customer journey includes:

- 1. **Introduction:** Representative explains who they are, the nature of the community solar program, and confirms the customer's utility.
- 2. **Eligibility Review:** The representative reviews utility bills, program rules, and, if applicable, income-related criteria.
- 3. **Program Explanation:** Key terms are explained, including how credits work, billing expectations, and the customer's role.

- 4. **Documentation Collection:** Required forms, signatures, and supporting documentation are collected in accordance with program and developer requirements.
- 5. **Submission:** CSR processes and submits the enrollment file in a structured format.
- 6. **Follow-Up:** Customers are provided with contact information and expected timelines for activation and bill impact.

7.2 Billing Models & Customer Education

CSR representatives are trained to explain billing models accurately **based on the specific program, developer, and state**. This includes:

- Consolidated utility bill structures
- Dual billing models
- Net credit formats
- Developer-specific structures that blend or modify these approaches

We do not generalize across programs. Our explanations are tailored to the structure of the program the customer is actually enrolling in.

7.3 Point of Contact & Support

CSR is in the process of developing a more formalized ongoing support function. In the meantime:

- Each customer is provided with their representative's contact information.
- Representatives are trained to be the first point of contact for questions that arise after enrollment.
- Customers are also provided with clear guidance on how to contact the developer or program administrator if needed.

Our goal is to handle everyday questions and clarifications so that developers are not burdened with high volumes of basic inquiries, while always ensuring customers can reach the program owner when appropriate.

Reporting, Data Management & Invoicing

Providing clear, structured visibility into enrollment activity and program pacing.

8.1 Internal Tracking & Automated Systems

CSR uses an automated internal system that populates spreadsheets with enrollment data for internal reporting and invoicing. This system is designed to:

- Capture all required fields for each enrollment
- Track submission status and timing
- Link documentation and verification notes to each record
- Support quality control reviews and audits

Internal reports are reviewed at the end of each day to ensure data accuracy and to identify any issues that may require follow-up.

8.2 Developer Reporting Cadence & Format

For developers, reporting cadence is based on:

- The developer's stated preferences, or
- A standard **biweekly schedule** when a preference is not specified.

Developers receive spreadsheet-based reports that include key information such as:

- Customer first and last name
- Contact details (phone number, email)
- Service address
- Relevant program details
- Copies or references to utility bills and required documentation

• Confirmation that the enrollment has been completed according to program and developer requirements

These reports provide clear line-of-sight into enrollment activity without requiring developers to reconstruct records themselves.

8.3 Invoicing & Alignment with Performance

Invoicing is aligned with the reporting schedule and is based on clearly defined milestones, as determined in partnership with each developer. The goal is to keep invoicing transparent and predictable, with data that supports each billed enrollment.

SECTION 09

Governance, Communication & Escalation Structure

Maintaining clear lines of communication and reliable points of contact.

9.1 Dedicated Developer Account Management

Each developer partner is assigned a **dedicated account manager or primary point of contact** at CSR. This person:

- Coordinates information between CSR and the developer
- Ensures that commitments and deadlines are tracked
- Responds to questions and clarifications
- Monitors the overall relationship and program status

Developers always know who to contact when they need assistance or information.

9.2 Communication Expectations & Meeting Cadence

Communication is structured to match each developer's preferences, but common elements include:

- Regular check-in calls or virtual meetings
- Review of recent enrollments, pacing, and any exceptions
- Discussion of upcoming changes to program rules, stipulations, or territories
- Space to address concerns before they become issues

CSR treats communication as part of program governance, not an afterthought.

9.3 Issue Resolution & Escalation Pathways

When questions or challenges arise, CSR follows an escalation path that may include:

- Representative-level clarification and correction
- Supervisor or training team involvement
- Account manager coordination with the developer
- Structured review of processes if a recurring issue is identified

The goal is to resolve issues quickly, learn from them, and prevent them from recurring.

SECTION 10

Performance Metrics, Results & Case Study Framework

Demonstrating consistent performance and a foundation for long-term scaling.

10.1 Key Performance Indicators (KPIs)

CSR focuses on performance indicators that matter to developers and program administrators, including:

Activation rate

- Enrollment approval rates
- Average time from enrollment to activation (where data is available)
- Volume of active enrollments over time
- LMI verification acceptance rates in applicable programs

10.2 Enrollment Volumes & Activation Rates

CSR currently averages approximately 1 million kilowatt-hours (kWh) of residential enrollments per week.

Our activation rate typically ranges between **85% and 92%**, reflecting the emphasis we place on:

- Screening for developer and program-specific stipulations
- Verifying eligibility and documentation in-house before submission
- Communicating clearly with customers during and after enrollment

We are focused not only on volume, but on quality and follow-through.

10.3 Case Study Structure & Future Program Growth

CSR is prepared to provide case studies to developers that outline:

- Program context and objectives
- Enrollment volumes and pacing
- LMI enrollment contributions where applicable
- Lessons learned and process improvements over time

We also remain committed to continued expansion, adding new markets within a structured, training-led framework so that quality standards are maintained as our footprint grows.

Implementation Roadmap & Partnership Onboarding

Providing a clear path from first conversation to active, compliant enrollment.

11.1 Initial Alignment & Program Setup

When beginning a new partnership, CSR works with developers to:

- Review program rules, documentation requirements, and stipulations
- Align on territories, target customer profiles, and pacing goals
- Clarify reporting expectations and invoicing structure
- Confirm escalation paths and primary contacts on both sides

This foundation allows deployment and enrollment to start from a stable, shared understanding.

11.2 Pilot or Launch Pathways

CSR is flexible in how new relationships begin and will follow the developer's preference. Options typically include:

- **Pilot model:** A defined initial period or territory to validate processes, quality, and communication.
- **Direct launch:** Full deployment in agreed territories when both parties are comfortable doing so.

In both scenarios, CSR tracks performance and feedback closely to make sure that early experience informs ongoing operations.

11.3 Long-Term Partnership & Expansion Planning

CSR views every engagement as the start of an ongoing relationship. Over time, we work with developers to:

- Adjust territories, pacing, and strategy based on program performance
- Expand into new states where programs become available and aligned
- Refine training and processes based on shared experience
- Maintain high standards of compliance, documentation, and customer experience

CONCLUSION

Thank you for taking the time to review this material and learn more about how Community Solar Representatives (CSR) approaches subscriber enrollment and program alignment. We are committed to responsible expansion of community solar participation and to supporting developers with a partnership model built on accuracy, consistency, and clear communication.

As community solar continues to grow and evolve, we look forward to the opportunity to contribute to that progress through reliable enrollment practices and strong working relationships. If this document raises questions, prompts discussion, or supports next steps, our team is ready to engage and move forward at your pace.

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