

To: Illinois Power Agency- IPA.contactus@illinois.gov
From: Kim Knowles and Participants in the Illinois Solar for All Working Group
Date: 7/20/2021
Re: Illinois Solar for All Working Group Response to IPA Request for Comments #1

Dear Illinois Power Agency & Program Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the request for comments issued following your first 2021 renewables plan workshop. This memo describes an overview of the Illinois Solar for All Working Group.

Background: Illinois Solar for All Working Group

The Illinois Solar for All Working Group (the Working Group) formed from a subset of members of the Illinois Clean Jobs Coalition, who had comprised an Environmental Justice-Solar-Labor Caucus (the Caucus) during the negotiation of policies that would become the Future Energy Jobs Act (FEJA). The group formed in order to bring the best practices and policies to the Illinois energy landscape that would serve to maximize benefits to the economically disadvantaged households and communities that targeted programs are intended to serve. The group was co-facilitated by a representative of a solar company, Amy Heart of Sunrun, and a representative of an environmental justice group, Juliana Pino of the Little Village Environmental Justice Organization.

Following passage of FEJA in December 2016, the Caucus expanded into the Illinois Solar for All Working Group, an open membership group including experts on environmental justice, environmental advocacy, consumer protection, solar business, low-income solar policy, energy efficiency, job training, program design, and other areas, who have substantive research and experience to bring to bear on implementation of Illinois Solar for All. Currently, the Illinois Solar for All Working Group meets on a monthly basis and is co-facilitated by Juliana Pino of Little Village Environmental Justice Organization and MeLena Hessel of Environmental Law and Policy Center. Over 75 participants include representatives from the following organizations and others:

Prairie Rivers Network	Trajectory Energy Partners
Environmental Law & Policy Center	Central Road Energies
Vote Solar	Sierra Club, Illinois Chapter
Seven Generations Ahead	Natural Resources Defense Council
Renewable Energy Evolution	

Working Group Commenting and Engagement History for IL Solar for All

- A draft White Paper delivered to the IPA in May 2017 and [published](#) that July.

- Many Working Group participants attended IPA’s May 2017 workshops and helped develop responses to IPA’s June 6, 2017 Request for Comments on the Long-Term Renewable Resources Procurement Plan.
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.
- Additionally, the group has engaged in stakeholder sessions and submitted comments on:
 - Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClima on December 10, 2018;
 - Grassroots Education and Approved Vendor components on January 9, 2019;
 - Environmental Justice provisions on January 30, 2019;
 - Job Training provisions and Third-Party Evaluation provisions on February 7, 2019;
 - Project and Participant Eligibility and Verification Processes on March 13, 2019;
 - the Low-Income Community Solar REC contract on April 2, 2019;
 - Project Selection on April 15, 2019; and
 - Consumer Protection on April 19, 2019.
- Many Working Group participants also attended IPA’s June 2019 workshops and helped develop the Working Group’s response to IPA’s July 3, 2019 Request for Comments on the Long-Term Plan Update.
- The Working Group continues to provide input to comment and stakeholder processes initiated this year to implement the Revised Long-Term Plan, including via May 2020 comments on project selection and July 2020 comments on Approved Vendor reporting.
- Thus far in 2021, the Working Group has submitted comments on the [DG subprogram referral](#) process and on [project selection](#).

Program Principles for Illinois Solar for All

During the negotiation of FEJA, the Caucus membership collectively agreed upon the following policy principles to guide our work moving forward. These principles were rooted in the *Low-Income Solar Policy Guide* authored by GRID Alternatives, Vote Solar, and the Center for Social Inclusion; further adapted through iterative deliberations in the Caucus; and ultimately adopted by the Working Group. The principles include:

- **Affordability and Accessibility.** Offers opportunities for low-income residents to invest in solar through a combination of cost savings and support to overcome financial and access challenges. Creates economic opportunities through a job training pipeline. Supports skill development for family-supporting jobs, including national certification and apprenticeship programs.
- **Community Engagement.** Recognizes community partnerships are key to development and implementation, ensuring community needs and challenges are addressed. Strive to maximize projects located in, and serving, environmental justice (EJ) communities. Allows for flexibility for non-profit/volunteer models to participate, and strives to meet potential trainees where they are, with community-led trainings.

- **Sustainability and Flexibility.** Encourages long-term market development and will be flexible to best serve the unique low-income market segment over time and as conditions change. Program administrator ensures community engagement, statewide geographic equity, and flexibility to meet goals. Job training program includes all training partners in design and implementation. Training offerings should come through diverse channels including utilities, unions, tech schools, non-profits, government agencies, and existing community-based job training organizations.

- **Compatibility and Integration.** Low-income program adds to, and integrates with, existing renewable energy and energy efficiency programs, and supports piloting of financing tools such as PAYS (pay-as-you-save), on-bill financing, PACE or community-led group buy programs. Jobs training programs will strive to ensure low-income solar installations incorporate workforce development, including coordinating opportunities for job training partners and individual trainees from the same communities that the low-income solar program aims to serve.

The Working Group researched and prepared the enclosed comments to deliver high quality information and recommendations on considerations for the Illinois Solar for All Program and the Long-Term Renewable Resources Procurement Plan. The contents are not intended to reflect universal consensus on any point amongst working group members. These contents reflect extensive deliberation regarding aspects that the Working Group believes are important to the Program's success moving forward.

In closing, we make these recommendations and comments to ensure high-quality implementation for Illinois communities. Communities throughout Illinois need the opportunities and services the Illinois Solar for All Program will provide and the support of groups with substantive experience in the solar industry and low-income solar in particular. Please do not hesitate to contact us with questions or comments in regards to this matter.

A. Strengthening equity, diversity, and labor standards in the renewable energy industry

Q1. The Agency has allowed for smaller initial blocks of project submittals for Minority/Women owned Business Enterprise (MWBE) Approved Vendors in the Adjustable Block Program, and added points in the Illinois Solar for All Program Project Selection Protocol (to date only used for low-income community solar projects and projects for non-profits and public facilities) for MWBE Approved Vendors, or Approved Vendors who make binding commitments to utilize MWBE subcontractors. While pending legislative proposals include new provisions including prevailing wage and project labor agreement requirements for many project categories, dedicated Adjustable Block Program blocks for projects submitted by equity eligible contractors, and increasing annual commitments for work to be conducted by equity eligible persons and contractors, under existing statutory authority, are there additional approaches that the Agency could include for project eligibility that could help remove barriers and/or encourage

participation by MWBE firms? If so, what approaches, and under what authority could those approaches be implemented? [See Slide 34]

Reducing barriers & encouraging MWBE participation in the Adjustable Block and the IL Solar for All Programs.

The Working Group has six suggestions for reducing barriers to and encouraging participation by MWBE firms.

1. Batch Size. We support further reducing initial batch sizes for MWBEs in both the ABP and the ILSfA program. Participating MWBEs believe initial batch size for ABP Small DG and the ILSfA DG subprogram should be reduced to 10 kWac, and to 20 kWac for the Nonprofit/Public Facility ILSfA subprogram and the ABP Large DG.

2. Project Selection. The Working Group believes Project Selection should include a refined and expanded points system for MWBE firms as shown below. We believe a refined point system that rewards companies that utilize MWBE firms at less than 50% of the REC contract value would encourage additional MWBE participation and smaller MWBE’s that may offer ancillary services. In addition, MWBE firms should separately be rewarded points for serving as Approved Vendors/Approved Vendor Aggregator or MWBE Mentors.

MWBE % of REC contract	Points-DG, NP/PF	Points-Community Solar
25-49%	.5	1
50-75%	1	2
75%=	1.5	3
Project Role	Points-DG, NP/PF	Points-Community Solar
MWBE AV/AVA	TBD	TBD
MWBE Mentor	TBD	TBD

3. MWBE Mentorship Program-We recommend the Agency consider the development of a mentorship program within both the ABP and the ILSfA wherein an experienced AV or AV aggregator serves as a mentor for a MWBE firm. Mentors could be rewarded with

extra points via project selection in ILSfA (our preferred approach) and monetarily in the ABP.

4. MWBE Adders-One option for helping incent MWBE participation in the Adjustable Block Program would be to provide adders for MWBE workforce participation (e.g., \$2 for 25% of the REC contract committed to MWBE subcontractors, \$3 for 50%, \$5 for 75%, \$7.50 for 100%).
5. Webinar series- MWBE firms have suggested the Program Administrators in the ABP and the ILSfA programs host and record regular educational webinars covering such topics as: the ABCs of project submission, AV Registration, Understanding the ILSfA Subprograms, Using the AV Manual & the ABP Program Guidebook, Removing Barriers to MWBEs, and What is the Long Term Renewable Resources Procurement Plan?
6. Expanded outreach to MWBE. The Agency should reserve the option to engage in expanding outreach pending reports by the Program Administrators on efficacious outreach methods used in similar programs. One Working Group member suggests IPA host networking events for industry stakeholders, including MWBE and other BIPOC businesses.

Q2. The Revised Long-Term Plan includes a requirement that Approved Vendors report on an annual basis information on the diversity of their workforce. [See Slides 35/6].

a. What additional reporting requirements should the Agency consider? For example, reporting on the diversity of the ownership of Approved Vendors and their Designees (e.g., installers or marketing firms), or reporting on workforce diversity on a project level rather than an annual portfolio level.

Response: We applaud the program for collecting data that can inform future initiatives aimed at ensuring the workforce meaningfully reflects the diverse composition of Illinois' residents. We would like to see companies that participate in the ABP and ILSfA report on their workforce composition by MWBE certification, race, gender, and ability on a "full time equivalency" (FTE) basis.

Currently, the AV is responsible for reporting diversity information for itself and its subcontractors in the ABP. However, the AV is not required to specify the identity of subcontractors. Because multiple AVs may utilize the same subcontractor and therefore report for that subcontractor, we are concerned that the information that is being collected does not reflect the actual workforce composition of the industry but is instead, resulting in over counting.

One approach is to require AVs to report the name and workforce composition of each of its subcontractors. The drawback to this approach would be that the program would then need to eliminate all the duplicate reporting from the annual reports to obtain an accurate counting. We feel a better solution would be to have AVs and subcontractors each file a separate report for their own companies.

To make this reporting work, subcontractors that work on ABP projects should be required to register with the ABP program as they are in the ILSfA program. This should not be overly burdensome for the AVs or the subcontractors as the application and reporting can be kept simple. This approach would relieve the AV from collecting information from its subcontractors and would provide the Agency and stakeholders with more accurate data.

Currently ILSfA program registration requires the provision of general company information, MWBE status, and some attestations of program qualification and compliance. The ILSFA form could be adapted for use in the ABP requiring AVs to use only registered ABP subcontractors for projects that utilize ABP RECs. Documentation that subcontractors are registered with the ABP would be required in the Part II Application and subcontractors in both programs would need to complete an annual report that would detail their workforce composition by race, gender, and ability on a FTE basis. A single form could be utilized for subcontractors that work in both the ABP and the SFA programs. We recommend reporting continue to be required on an annual basis so as not to be overly burdensome.