

Draft Referral Proposal

For Income-Eligible Households in the Illinois Solar for All Low-Income Distributed Generation Sub-Program

In order to increase participation in the Low-Income Distributed Generation (DG) sub-program, the Illinois Power Agency (IPA or Agency) and the Illinois Solar for All (ILSFA) Program Administrator, Elevate Energy, are proposing a new referral approach to facilitate connecting potential income-eligible households with Approved Vendors.

In approving the IPA's Revised Long-Term Renewable Resources Procurement Plan (Revised Long-Term Plan), the Illinois Commerce Commission (Commission) stated that the Agency and Program Administrator "should explore implementing a process to connect interested income-qualified customers with ILSFA Approved Vendors," and further explained that "any such process must be implemented in a competitively neutral fashion and strive to provide equal information and opportunities to all applicable ILSFA Approved Vendors."¹

Two other recent actions taken by the Program Administrator are intended to facilitate this process. First, as part of the Revised Long-Term Plan approval process, the Commission approved the Agency's proposal allowing interested households to request verification of income-eligibility directly through the Program Administrator rather than through an Approved Vendor. That direct verification process will be implemented in Winter 2020/2021; interested households will be able to obtain eligibility letters from the Program Administrator that would be valid for six months. Income Verification using either Method A (Third-Party Verification) or Method B (Tax Transcript Verification) will be completed by the Program Administrator after the potential participant submits the required documents. Once verification is complete, the now income-verified potential participant will be given a letter of eligibility, valid for six months, that they will be able to provide to Approved Vendors.

Second, the Program Administrator has solicited information from Approved Vendors on standard offers available for 1-4 unit residential buildings. The Program Administrator has published a [chart](#) of those offers on the ILSFA website, which will be updated on a regular basis. This chart is also being distributed by grassroots education organizations.

¹ See Final Order in Docket No. 19-0995 at 108.

In order to further spur interest in the program, and to lower soft costs for Approved Vendors, the next step is to consider better approaches to connecting income-eligible households to Approved Vendors through a referral process.

The Agency and Program Administrator propose the following approach:

- Participation in the referral process is expected to be driven by grassroots education events and visitors to the ILSFA website, as well as initiatives aimed at integrating ILSFA with energy efficiency programs.
- Interested households will have their income verification conducted by the Program Administrator (through either verification of participation in a third-party qualifying program or through review of tax transcripts), provide basic information about their home (e.g., average electric bill, age and condition of the property's roof, shading on the roof or yard, and whether the home's electrical system has been updated), and agree to have their information shared with participating Approved Vendors.
- Interested participants will be informed of the number of Approved Vendors participating in the referral program in their area (in addition to specifics about each of those Approved Vendors) so that interested participants can be informed about how many outreach attempts they can expect if they elect to participate in the referral process.
- If no applicable Approved Vendors are available (in the geography, for the site/roof type, etc.), the Program Administrator will check every month and will follow up with the potential participant if/when an applicable Approved Vendor becomes available. The Program Administrator will compile all completed requests and provide them to participating Approved Vendors on a weekly basis.
- To participate in the referral program, Approved Vendors will have to agree to the following:
 - Approved Vendors will contact the interested household within one week of receiving a referral.
 - No information on the interested household may be shared with any third party (with the exception of subcontractors or ILSFA implementation partners for the sole purpose of responding to the referral). If the household does not respond to the Approved Vendor's outreach or declines services from the Approved Vendor, the Approved Vendor will not retain the information on the household.
 - Call attempts or emails should be limited to four touches (in total) and be suspended immediately if the household asks not to be contacted again or declines services from the Approved Vendor.

The Program Administrator (or as appropriate, grassroots education organizations) will periodically follow up with participating households to assess their participation in the program. If that follow-up indicates that Approved Vendors are not complying with these requirements, Approved Vendors may be removed from the referral program.