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# Approved Vendor Manual

VERSION ~~3.34.0~~

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# 1. Introduction

The Illinois Solar for All Approved Vendor Manual is intended to provide detailed guidance for Approved Vendors on the intent, requirements, and processes of the Illinois Solar for All (ILSFA) program. This document will provide an overview of the program scope, goals, and specific requirements, as well as detailed descriptions of processes from vendor registration through project approval and facilitation of Renewable Energy Credit (REC) contracts.

The ILSFA Approved Vendor Manual will be updated as needed to reflect new or revised program information. A red-lined version of the manual will be posted on the ILSFA website and announced to stakeholders each time the Approved Vendor Manual is updated. Changes from previously released versions will be highlighted in by the redlining as well as added to an appendix at the end of the manual. Version 3.34.0 of the Approved Vendor Manual will take effect starting with the 2020-2021-2022 program year. The Illinois Power Agency (IPA or Agency), within the Revised Plan allocates funds and considers project applications within ILSFA based on “program years,” which track the same period of time as energy delivery years (June 1<sup>st</sup> of one year to May 31<sup>st</sup> of the following year).

This manual presents resources and information needed to help Approved Vendors and Approved Vendor applicants navigate the requirements and processes of the ILSFA program and successfully deliver benefits to program participants. Through this manual, other resources, and one-on-one support, the Program Administrator will assist Approved Vendors in delivering energy benefits to qualified participants and foster the growth of the emerging solar market within low-income communities (LI communities) and Environmental Justice Communities (EJCs) across Illinois.

## 1.1. Illinois Solar for All Program

### PROGRAM WEBSITE

The latest news, updates, information, and program interface for Approved Vendors is available at the ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com). This website provides an online portal for registration of ILSFA Approved Vendors. Once registered, Approved Vendors will be granted unique login credentials that

provide access to resources, an individual project and performance dashboard, and a portal for submitting and tracking projects through completion.

The website also provides information and resources for the public and other program stakeholders, including resources on participant eligibility, job training programs, grassroots education funding, EJsCs, and more. The Program Administrator will use the website and email communications as the prevailing methods for sharing and exchanging information with Approved Vendors.

### 1.1.1. LEGISLATION AND ADMINISTRATION

ILSFA is administered pursuant to Section 1-56(b) of the [Illinois Power Agency Act \(20 ILCS 3855\)](#), as updated by [Public Act 99-0906](#) (known as the Future Energy Jobs Act or FEJA). The ~~Illinois Power Agency (IPA or Agency)~~ is the state agency responsible for implementation of the program. Day-to-day administration of the program is the responsibility of the Agency’s Program Administrator, Elevate Energy, ~~(Elevate)~~, and partner firms GRID Alternatives, AECOM, and Shelton Solutions.



- Program Administration
- Coordination of Job Training Requirements
- Quality Assurance
- Income Verification  
• Environmental Justice  
• Coordination

### 1.1.2. PROGRAM FUNDING

Program funding comes from two sources: the Renewable Energy Resources Fund (RERF) and utility-held funds collected from the Renewable Portfolio Standard riders. Held by the State of Illinois, the RERF was originally funded by Alternative Retail Energy Suppliers through Alternative Compliance Payments. The approved Revised [Long-Term Renewable Resources Procurement Plan](#) (Revised Plan) allows for \$16.5 million annually to fund the Low-Income Distributed Generation (LIDG), Low-Income Community Solar (LICS), and Incentives for Non-Profits and Public Facilities (NP/PF) sub-programs of ILSFA from the RERF (additional RERF funds are allocated to the Low-income Community Solar Pilot Procurements). The utility-held Renewable Portfolio Standard funds were collected from ratepayers through dedicated bill riders for funding renewable energy resources. The Revised Plan allows for \$10 million annually, or 5% of the available funds, whichever is greater, to fund ILSFA from the utility-held funds. This dual source of funding creates some complexities in contracting for REC purchases. REC contracts will be funded solely with one or the other holder of funds, with a spending priority placed on utility held funds.

### 1.1.3. LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN

A complete description of the ILSFA program can be found in Chapter 8 of the Revised Plan. The Revised Plan lays out requirements for the development and implementation of ILSFA, including annual funding, Approved Vendor requirements, consumer protections, vendor marketing guidelines, and incentive values. The Revised Plan also provides a framework for the interpreted intent of the legislation by laying out specific definitions of participants, including income requirements and eligibility, project eligibility,

and job training requirements, and sets a goal for the allocation of 25% of all incentives to EJs, among other important program parameters.

The Initial Plan was approved by the Illinois Commerce Commission (ICC) on April 3, 2018, and provided a framework for program delivery through February 2020. On October 21, 2019, the Agency filed a Revised Plan for review and approval at the ICC in Docket No. 19-0995. The ICC issued a Final Order approving the Revised Plan on February 18, 2020, and the Revised Plan was published on April 20, 2020.

This manual may be subject to change based on future changes made to the Plan. In addition to the approval of the Agency's Revised Plan, many other aspects of photovoltaic (PV) development and installation in Illinois are under the jurisdiction of the ICC. These include the certification of distributed generation (DG) installers, interconnection standards, net metering tariffs, and tariffs allowing for a smart inverter rebate for non-residential PV systems.

#### 1.1.4. INTENT OF ILLINOIS SOLAR FOR ALL PROGRAM

ILSFA is intended to bring the benefits of solar energy and the clean energy economy to LI communities and EJs across Illinois. Eligible low-income households, non-profit organizations, and public entities that participate in ILSFA see significant electricity savings and are provided comprehensive consumer protections important to the unique needs of these communities. Eligible low-income households will not see upfront costs. While the [Adjustable Block Program](#) (ABP) provides incentives in a similar way to ILSFA (delivering incentives through the purchase of RECs), ILSFA sets the value of incentives significantly higher than the ABP. RECs purchased at a higher value through ILSFA are intended to provide cost recovery for the additional anticipated expenses of implementing ILSFA projects and allows a greater share of incentives to be passed on directly to qualifying participants.

ILSFA incentivizes participation in solar PV projects by qualified participants—whether as a system owner, lessee, or community solar project subscriber—through the purchase of RECs. The ILSFA program seeks to overcome historic barriers to developing solar for low-income households, such as a lack of taxable income needed to monetize tax-based incentives, a lack of access to capital, a lack of access to workforce development, and other institutional barriers that limit accessing these opportunities.

## 1.2. Environmental Justice Communities

The principle of environmental justice requires that no segment of the population, regardless of race, national origin, age, or income, should bear disproportionately high or adverse effects of environmental pollution. Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. ILSFA provides special consideration to Environmental Justice Communities (EJCs) by setting a goal that at least 25% of program funds be allocated to projects located in or serving EJs. In addition, the grassroots education funding initiative within the Revised Plan requires that up to 60% of those funds or up to 3% of program funds be allocated to educating EJs on the benefits and opportunities of the program.

A methodology for determining which communities in Illinois qualify as EJs for the purposes of ILSFA was established in the Initial Plan and has been further refined by the Program Administrator and Agency through a stakeholder engagement process. An interactive mapping tool is available that allows users to identify qualifying EJs by census blocks groups across the state. This tool provides a map of these communities and an address lookup feature tool that allows users to enter any address in the state and determine whether ~~or not~~ that property is located within an EJC.

In addition to EJs that have been determined based on the methodology laid out in the Revised Plan and through stakeholder feedback, the Program Administrator and Agency have also set out a process for communities to Self-Designate as an EJC.

Access the Illinois Solar for All Environmental Justice Community Map [here](#).

Access the Illinois Solar for All Self Designation Process [here](#) and the Self-Designation Application [here](#).

## 2. Sub-Programs Overview

At the core of ILSFA are four sub-programs: 1) Low-Income Distributed Generation (LIDG), 2) Non-Profit and Public Facilities (NP/PF), 3) Low-Income Community Solar Project Initiative (Low-Income Community Solar or LICS), and 4) Low-Income Community Solar Pilot. This manual provides guidance for Approved Vendors to participate in all sub-programs, except for Low-Income Community Solar Pilot, which will be conducted as a separate, competitive procurement managed by the IPA's Procurement Administrator. [More information on this competitive procurement can be found here.](#)

All ILSFA sub-programs require that participants see a minimum specified savings, where ongoing costs or fees to the participant do not exceed 50% of the value of energy produced by their PV system or, in the case of community solar, their share of the installed PV system (see Section 5 on Participant Savings Requirements of this manual for more details). The LIDG sub-program additionally requires eligible low-income households in 1-4 unit buildings see no upfront costs (defined as any costs paid prior to project energization). A number of important consumer protections are required that differ across sub-programs. Although Approved Vendors are not prohibited from charging upfront costs for projects in the NP/PF sub-program, savings are still expected to be shared with the participating non-profit or public facility. More details on the requirements for this sub-program are in Sections 2.2 and 4.2.

REC price schedules for each sub-program appear in the following tables, which are organized by system size and utility groups. Group A is for projects located in the service territories of Ameren Illinois, MidAmerican, Mt. Carmel Public Utility, and rural electric cooperatives and municipal utilities located in MISO, and Group B is for projects located in the service territories of ComEd and rural electric cooperatives and municipal utilities located in PJM. Across all incentive programs, the system sizes are measured in maximum continuous AC as measured at the inverter. Qualified and approved participating



projects receive a set payment in exchange for all RECs generated<sup>1</sup> over their first 15 years of operation, paid upfront upon verification of energization. These payments are made through contracts between Approved Vendors and either the IPA for RERF-funded REC purchases or from Illinois electric utilities for utility-funded REC purchases.

Sub-program budgets will be announced on the ILSFA website prior to the start of the 2021-2022 Program Year.

## 2.1. Low-Income Distributed Generation

**Annual Budget: \$8.367 million<sup>2</sup>**

Distributed generation (DG) projects are installed onsite, typically behind a customer’s meter and used primarily to offset a single customer’s load. Within ILSFA, DG projects serve two market segments, one- to four-unit residential DG and five or more-unit residential DG, each with a specific REC price schedule. The Low-Income Distributed Generation (LIDG) incentive is intended to provide funding for PV projects located on residential properties where, if serving a building with multiple units, 50% or more of the building’s households are low-income. See section 5.2 of this manual, Project and Participant Eligibility, for more details.

**TABLE 2.1. INCENTIVES FOR 1- TO 4-UNIT BUILDINGS MARKET SEGMENT (\$/REC)**

System Size	Group A	Group B
≤10 kW	\$143.09	\$143.09
>10 - 25 kW	\$127.55	\$127.55
>25 - 100 kW	\$103.28	\$103.28
>100 - 200 kW	\$90.40	\$90.40
>200 - 500 kW	\$84.41	\$84.41
>500 - 2,000 kW	\$80.69	\$80.69

<sup>1</sup> The exceptions to the rule of all RECs generated being delivered and compensated are generally as follows: in any given year of the 15-year contract, any unsubscribed share of a Low-Income Community Solar project would not receive payment for its RECs. Additionally, RECs associated with the unsubscribed share as of one year after energization would not be required to be delivered throughout the 15 years. Additionally, any subscribed share of a Low-Income Community Solar project that has a non-low-income subscriber other than the project’s anchor tenant would not receive payment or have a delivery obligation for the associated RECs.

<sup>2</sup> ~~Expected 2020-2021 Program Year Budget. Does not include any prior program year funds not allocated to projects that roll over to the 2020-2021 program year, nor set asides for administrative expenses and grassroots education funding.~~

**TABLE 2.2. INCENTIVES FOR 5+ UNIT BUILDINGS MARKET SEGMENT (\$/REC)**

System Size	Group A	Group B
≤10 kW	\$117.62	\$118.20
>10 - 25 kW	\$107.08	\$107.65
>25 - 100 kW	\$87.70	\$88.28
>100 - 200 kW	\$74.67	\$75.26
>200 - 500 kW	\$68.59	\$69.19
>500 - 2,000 kW	\$65.32	\$65.92

For the purposes of establishing an incentive level, a system location is a single building, i.e., multiple projects at a single building would be considered a single system. Exceptions may be granted for located on the same roof where it can be demonstrated that the projects serve different, unaffiliated occupants.

## 2.2. Non-Profit/Public Facilities

**Annual Budget: ~~\$5.578 million~~<sup>3</sup>**

Non-Profit/Public Facilities (NP/PF) projects are installed onsite, behind a customer’s meter, and used primarily to offset a single customer’s load. The NP/PF incentive is intended to provide funding for PV projects located on (i) buildings serving non-profit customers or (ii) public facilities.

NP/PF projects must be located within LI communities or EJCs. Additionally, projects must demonstrate both of the following conditions:

1. Having a sufficient connection to and input from the LI community or EJC members and/or the non-profit or public facility it serves by:
  - a. Providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation
  - b. Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation
2. The property is occupied by a Critical Service Provider (CSP) for the community (e.g., youth centers, hospitals, schools, homeless shelters, senior centers, community centers, places of

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<sup>3</sup>~~Expected 2020-2021 Program Year Budget. Does not include set asides for administrative expenses nor grassroots education funding.~~

worship, affordable housing providers including public housing sites). For a public facility, the building must host a department/agency that is a CSP meeting this standard. Section 4.2 includes a list of qualified CSPs.

**TABLE 2.3. INCENTIVES FOR NON-PROFITS AND PUBLIC FACILITIES (\$/REC)**

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
≤10 kW	\$155.87	\$156.57
>10 - 25 kW	\$142.55	\$143.26
>25 - 100 kW	\$118.57	\$119.28
>100 - 200 kW	\$102.83	\$103.55
>200 - 500 kW	\$95.61	\$96.34
>500 - 2,000 kW	\$91.31	\$92.04

## 2.3. Low-Income Community Solar Project Initiative

~~Annual Budget: \$13.946 million<sup>4</sup>~~

Low-Income Community Solar (LICS) projects are installed on rooftops or ground-mounted and are interconnected directly to the utility’s distribution system. LICS projects are installed anywhere within a utility service territory and can be subscribed to by residents who live within that utility service territory. LICS incentives are intended to provide funding for community solar projects designed to serve low-income households. See section 5.2 of this manual, Project and Participant Eligibility, for more detail.

Except as noted in this paragraph, subscribers to a LICS project must be low-income residential households (which for this purpose includes a master-metered affordable housing building), and RECs produced from the corresponding subscription shares will receive the LICS prices shown below. No subscriber may have greater than a 40% share of the system capacity. A LICS project may have, at most, one anchor tenant, identified at the time of project application, that is not a low-income residential household. An anchor tenant may be any ratepaying entity, including a non-low-income residential household, a business, a non-profit organization, or a public entity. Note that for a master-metered affordable housing building to be considered as a low-income residential household, the property owner is required to demonstrate that the required savings value is being passed on to tenants. Master-metered buildings may participate as anchor tenants without this requirement.

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~~<sup>4</sup>Expected 2020-2021 Program Year Budget. Does not include set-asides for administrative expenses nor grassroots education funding.~~

RECs produced from the anchor tenant’s share of the project will be paid based on currently applicable Adjustable Block Program prices; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA LICs price. Outside the anchor tenant, any subscription share that is not subscribed by a low-income residential household will not receive payments, nor will the Approved Vendor be required to deliver those RECs through the ILSFA REC contract. At least 50% of proposed low-income household subscribers (in kW volume) must be identified at the first year annual report (one year after the time of energization) in order for the project to receive payment under the contract. See the REC contract for specific requirements and remedies.

Collateral of 5% of total remaining project REC value must be maintained for 10 years. Annual reporting is required to verify new subscriber income and low-income share; if the original levels at the time of energization are not maintained in any given delivery year, then the collateral may be called upon to claw back the incentives to reflect the actual low-income subscription level achieved in that delivery year.

### 100% LOW-INCOME-OWNED PROJECTS

A further provision of the Revised Plan provides a REC adder for LICs projects that are 100% low-income subscriber-owned, which includes low-income households, non-profits, and affordable housing owners. The incentive level will be increased by \$5 per REC for these qualifying projects when the 100% ownership is achieved. In these instances, the Approved Vendor must verify that system ownership rests with low-income household subscribers and/or non-profit or affordable housing entities. To be eligible for this additional incentive, the ILSFA Approved Vendor will need to certify the intent for the project to be 100% low-income subscriber-owned at the time of application, and, if the project is not initially structured this way, will have up to six years after energization to complete the full transfer of ownership to the low-income subscribers. If the project ceases to be 100% low-income subscriber-owned after the \$5 per REC incentive is paid, a prorated amount (based on the time remaining in the contract) of the \$5 per REC will be paid back.

**TABLE 2.4. INCENTIVES FOR LOW-INCOME COMMUNITY SOLAR PROJECTS (\$/REC)**

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
≤10 kW	\$121.99	\$119.55
>10 - 25 kW	\$111.98	\$109.52
>25 - 100 kW	\$93.32	\$90.82
>100 - 200 kW	\$80.72	\$78.20
>200 - 500 kW	\$74.78	\$72.23
>500 - 2,000 kW	\$71.29	\$68.74
Co-located systems exceeding 2 MW in aggregate size	\$64.88	\$62.30

**TABLE 2.5. INCENTIVES FOR NON-QUALIFIED PARTICIPANT SHARE OF COMMUNITY SOLAR PROJECTS (\$/REC)<sup>5</sup>**

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
≤10 kW	\$85.04	\$81.30
>10 - 25 kW	\$77.03	\$73.28
>25 - 100 kW	\$62.77	\$58.96
>100 - 200 kW	\$53.50	\$49.65
>200 - 500 kW	\$49.07	\$45.20
>500 - 2,000 kW	\$46.25	\$42.36
Co-located systems exceeding 2 MW in aggregate size	\$41.61	\$37.68

**SMALL SUBSCRIBER ADDER**

Like the Adjustable Block Program, small subscriber price adders can be applied based on the percentage of the project’s energy output subscribed to by qualifying small subscribers, not the number of small subscribers. However, the percent of qualifying small subscribers is determined by the share of the project subscribed by low-income households (with subscription sizes under 25 kW) only, not small non-residential anchor tenants. As described in more detail in Sections 6.15.3 and 6.17 of the Revised Plan, a community solar project will have to demonstrate a level of small subscribers at the time of energization to receive an adder initially. The value of the Small Subscriber Adder will be further adjusted by subscriber share from annual reporting at the end of the first year and revised accordingly in the REC contract for all future deliveries, and the subscription share of residential small subscribers will be evaluated in all future delivery years (with claw backs made in any delivery year if the small subscriber share falls below the range from Table 2.6 that was used to set the price adder at the end of project year one).

**TABLE 2.6. COMMUNITY SOLAR SMALL SUBSCRIBER PARTICIPATION ADJUSTMENTS (\$/REC)**

<b>Adder (\$/REC)</b>	<b>Group A</b>	<b>Group B</b>
Less than 25% small subscriber	No Adder	No Adder
25% or greater small subscriber and less than 50% small subscriber	\$11.17	\$10.88

<sup>5</sup> These prices reflect Block 4 of the Adjustable Block Program, based on the filling of that Block (in both Group A and Group B) via the April 10, 2019 community solar project selection lotteries.

50% or greater small subscriber	\$22.34	\$21.77
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## 2.4. Low-Income Community Solar Pilot

The Low-Income Community Solar Pilot Program, the fourth and last sub-program of ILSFA, is conducted as a separate competitive procurement, facilitated by the IPA’s Procurement Administrator. Low-Income Community Solar Pilot projects must result in economic benefits for the members of the community in which the project will be located and must include a partnership with at least one community-based organization. While the pilot is like the other sub-programs in the requirements of community economic benefit and partnership, the pilot is different in that the projects will be developed outside the processes and guidelines described in this manual, and prices paid for RECs will be based on competitive bidding rather than a pre-set price schedule. Additionally, the size limitation of 2,000 kW applicable to Low-Income Community Solar projects will not apply for the pilot projects. The first procurement event under this sub-program was conducted in the fall of 2019, with a total budget of \$20,000,000. The date and process for a subsequent procurement will be announced at a later date. More information can be found on the Low-Income Community Solar Pilot sub-program [here](#).

# 3. Approved Vendor Requirements and Registration

Similar to the Adjustable Block Program, Approved Vendors will be responsible for facilitating participation in ILSFA. Only Approved Vendors will be eligible to directly receive REC payments through ILSFA as contractual counterparties. The Approved Vendor model will ensure the accuracy and quality of information submitted and reduce the administrative burden on the contractual counterparties. This benefits consumers because they will be able to verify that an entity that proposes to develop an onsite PV system (or sell them a subscription to a community solar project) is a legitimate entity participating in the program. An Approved Vendor that fails to live up to the requirements of either the Adjustable Block Program or the ILSFA program could have a significant negative impact on the entire renewable energy market in Illinois. It is important for the Agency and the Program Administrator to have the ability to monitor the program and ensure high-quality performance by Approved Vendors.

## 3.1. Approved Vendor Types

There are four types of Approved Vendors that can ~~develop~~ play a role in developing projects for ILSFA: 1) Approved Vendors, 2) Aggregator Approved Vendors, 3) Designees, and 4) Single Project Approved Vendors. Approved Vendors and Single Project Approved Vendors have the same roles and responsibilities as they do in the Adjustable Block Program. ILSFA makes further distinction in roles by identifying Aggregator Approved Vendors and Designees, two new types of Approved Vendors that will work collaboratively to develop projects. All Approved Vendor types, except for the Designee, must register and maintain their status as Approved Vendors in the Adjustable Block Program. The categories are described below in further detail.

## APPROVED VENDORS

An Approved Vendor will be the entity that is the contractual counterparty with either the IPA or an Illinois electric utility for RECs purchased through ILSFA, and thus will be the entity that receives payments from the IPA or utility for REC deliveries as contract obligations are met. Approved Vendors are ~~the entities~~ responsible for submitting documentation to the Program Administrator (as the responsible party for the information contained in that documentation), maintaining collateral requirements, and providing ongoing information and reporting. As such, the Approved Vendors will have to coordinate the downstream information from installers/developers as well as individual system owners who may provide required information through the installer/developer to satisfy project and program requirements.

## AGGREGATOR APPROVED VENDORS

The Program Administrator recognizes that the role Aggregator Approved Vendors (Aggregators) play in the market is an important one, especially because they can help facilitate small or new solar installation companies' participation in ILSFA. Aggregators can help to provide important services to qualified entities that may otherwise face barriers in the market.

Like Approved Vendors, Aggregators are also the contractual counterparty with either the IPA or an Illinois electric utility for RECs purchased through ILSFA. REC Aggregators will work within the ILSFA program managing RECs on behalf of system owners. It is important to note that Aggregators can also act as Approved Vendors, developing projects and interacting with the market. In this case, entities performing both roles should register separately as both an Approved Vendor and an Aggregator, as the requirements and registration processes are different for each.

The primary difference in the role of Aggregator is their management of REC delivery and contracts for designated entities they represent. Designees or system owners will contract directly with Aggregators, working within the Aggregator's business and fee structure as a separate contractual arrangement from the ILSFA program. While Aggregators must first be registered with the Adjustable Block Program, the Designee is not required to do so. It is anticipated that the Designee will be the entity managing customer interaction and installation, and while it is required that Designees follow program processes and requirements, the Aggregator is ultimately accountable for meeting program requirements for projects developed by their Designees. Similar to the Approved Vendor, the Aggregator Approved Vendor will have to coordinate the downstream information from Designees/installers/developers as well as individual system owners who may provide required information through the Designees/installer/developer to satisfy project and program requirements. Either the Aggregator or Designee may enter and manage project applications in the ILSFA portal. Designee status allows registered entities to have their own ILSFA portal accounts in order to manage project applications independently. Designees must identify and verify the Aggregator they have contracted with upon registration for each project.

## DESIGNEES

It is anticipated that the Designee will act in most respects exactly as an Approved Vendor, except for allowing Aggregators to manage their long-term REC contracts and act as the counterparty to those

contracts. However, Aggregators may find a market advantage in providing collective services for their Designees, like leveraging installation services, compliance with job training requirements, or procurement. Project applications can be completed by the Designee or the Aggregator. Designee status allows registered entities to have their own ILSFA portal accounts to manage project applications independently, as long as those accounts are formally associated with a registered Aggregator.

While Aggregators are ultimately responsible for meeting all program requirements, Designees are required to meet all project-level requirements, including quality assurance and inspection requirements. Failure to meet these requirements or poor-quality performance may result in disciplinary action or warning and suspension status for both the Designee and the Aggregator.

Designees are not required to register for the Adjustable Block Program. However, Designees are required to register for ILSFA in the same way as an Approved Vendor. Designees can register for ILSFA once designated by the Aggregator and can work with multiple Aggregators. Aggregators must approve final registration submissions for their Designees before beginning to work on ILSFA projects. Designees can initiate project applications and assign each new project to an Aggregator at the time of project application.

#### SINGLE PROJECT APPROVED VENDOR

Entities can choose to register as an ILSFA Single Project Approved Vendor according to the limitations and requirements set forth in the Revised Plan. Single Project Approved Vendors within the ILSFA program must meet the following requirements:

- The Single Project Approved Vendor will be the registered owner of the system.
- Total capacity of the system will be at least 50 kW.
- A Single Project Approved Vendor entity can receive incentives only once with either ILSFA or the Adjustable Block Program, but not both.

The following ILSFA requirements are not applicable to Single Project Approved Vendor applications:

- Standard contracts between the Approved Vendor and program participant/system host
- Standard disclosures
- The use of ILSFA standard brochures

Note that for community solar projects, all consumer protection requirements for ILSFA, as described in the Consumer Protections section of this manual, do apply for projects submitted by Single Project Approved Vendors. Also, all Single Project Approved Vendor projects must meet the job training requirement of at least 10% of all hours performed being performed by Qualified Job Trainees. See the Job Training Requirements section of this manual for more details.

#### SUBCONTRACTORS AND CONTRACTING WITH CUSTOMERS

The definition of an Approved Vendor as provided by the Revised Plan allows for flexibility regarding how various entities may be involved in a given solar development. The use of subcontractors offers an alternative to the Aggregator and Designee roles listed above. It is common in the solar industry for multiple business entities to have roles in the development process at different stages. For example,



some solar developers use independent sales organizations to acquire customers and contract with customers. They may also use subcontractors to perform the installation. If that solar developer maintains the REC contract, they are required to be the Approved Vendor and accept responsibility for meeting all program requirements.

Similarly, some solar companies acquire customers and may even facilitate installation with their employees or with subcontractors. But instead of managing long-term REC contracts, they transfer ownership to investor organizations. In these instances, the solar developer could act as a Designee, with the investor organization acting as an Aggregator. It is also feasible that the investor organization is the Approved Vendor and all other entities are subcontractors. In all instances, the Approved Vendor or Aggregator maintains the REC contract and holds accountability for meeting all program requirements.

The flexibility in this model means that those entities directly interacting and ultimately contracting with customers may or may not be Approved Vendors. Therefore, in order to increase transparency for the program, subcontractors will be required to register with the Program Administrator. The types of subcontracts subject to this provision include those that have direct interaction with end-use customers. This includes installers, marketing firms, lead generators, and sales organizations. The Agency reserves the right to add additional categories as needed. Potential customers will then be able to verify that a company that reaches out to them is actually a program participant registered with the Program (and likewise be able to review if they are listed on the complaint or disciplinary databases).

Registration shall encompass the subcontractor's provision of contact information, acknowledgment of the business relationship with the Approved Vendor, and identification of the categories of the consumer-facing services provided. Additionally, a subcontractor is responsible for acknowledging that they will comply with all Program requirements applicable to installers or marketing agents, as applicable. Failure by a subcontractor to comply with applicable requirements could subject them to suspension or termination from registration. If the subcontractor ignores a suspension (or termination) decision made by the Program Administrator and continues its market activity nonetheless, any Approved Vendor that works with that subcontractor during that period will be subject to discipline. Likewise, Approved Vendors found to be working with entities engaged in the proscribed activities that fail to register will be subject to discipline.

The ultimate accountability for any given batch or project resides with the Approved Vendor or the Aggregator. But, as stated previously and elsewhere in this document, the Program Administrator will monitor all entities and has the right to exclude any entity from performing work on ILSFA projects.

## 3.2. Roles in the Approved Vendor Model

While each type of Approved Vendor is ultimately accountable for meeting all program requirements, individual project requirements and installation quality will be tracked to Designees and subcontractors as well. As such, the same standards of consumer protection and quality of service will be required of all entities in the Approved Vendor model and each entity may be subject to disciplinary action or suspended from the program accordingly. Specifically, Designees will need to register with ILSFA, and subcontractor information will be submitted as part of the project approval process, with job training, consumer protection, and quality assurance performance tracked to these entities on an ongoing basis.

Like the Adjustable Block Program, there is not a specific delegation of duties between the Approved Vendor, installer/developer, and system owner, except as described with the relationship of various Approved Vendor types here. The key consideration is that any Approved Vendor, regardless of type, is ultimately responsible for the fulfillment of contractual obligations, including any obligations delegated to Designees or subcontractors, in a manner consistent with the requirements of the Revised Plan and of the Approved Vendor's REC contract with the relevant counterparty.

Approved Vendors must renew their approval with the Adjustable Block Program annually to maintain an active status with ILSFA. Failure to do so will result in suspension or removal from the program. While there is no requirement to renew registration annually for the ILSFA program, Approved Vendors must meet all program requirements, including annual performance requirements, to maintain active status with ILSFA. An annual review by the ILSFA Program Administrator will assess each Approved Vendor to ensure all program requirements have been met. Annual performance reviews may result in disciplinary action or suspension from the program based on details outlined elsewhere in this manual. Losing status as an ILSFA Approved Vendor would not relieve an Approved Vendor of its contractual obligations to ensure that RECs from its projects that have been energized continue to be delivered to the applicable entity; failure to do so could result in having the vendor's credit collateral drawn upon.

### 3.3. Approved Vendor Registration Process

Approved Vendor registration will be facilitated through the vendor portal on the ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com). After the applicant has successfully completed the Adjustable Block Program Approved Vendor registration process (where applicable), it may begin the ILSFA Approved Vendor registration process by creating an account and submitting answers to a series of questions. While Designees are not required to register with the Adjustable Block Program, it must first be designated by, and have its final registration submission approved by, an Aggregator. The ABP requires annual recertification of Approved Vendors, and those that fail to recertify their ABP registrations will not be allowed to submit projects in ILSFA. The registration process for all Approved Vendor types requires the applicant to provide specific information describing its anticipated work with ILSFA, relevant experience, and plans for meeting all program requirements.

It is recognized that because of the broad definition of the Approved Vendor, a number of entities may work together to bring ILSFA projects to market and contribute to the Approved Vendor meeting program requirements. As such, responses to registration questions may represent the experience, expertise, or work performed/to be performed by entities other than the Approved Vendor. For example, an Approved Vendor using installers/contractors may use the staffing details and planning of those installation contractors to respond to questions related to meeting job training requirements. Aggregators may use the experience, expertise, and work plans of Designees for their application.

It is encouraged that all applicants read these requirements and registration questions carefully before beginning the registration process and develop a clear strategy for collecting the required information. Much of the information collected during registration is captured in a narrative form, allowing Applicants to provide nuanced details for each subject area. It is important that applicants use this format to convey a clear understanding of each entity anticipated to be working on ILSFA projects for, to clarify their roles, and to clearly state how each response corresponds to those entities.

Once an application is received, the Program Administrator will either approve the application or will communicate any deficiencies to the applicant. Once the applicant corrects the deficiencies, a determination will be made and communicated to the applicant. If, after deficiencies have been communicated to the applicant, the applicant is unresponsive for at least 10 business days, the Program Administrator has the right to cancel the application. Note that Approved Vendor applications submitted shortly before or during a project submission window may not be reviewed prior to the closing of the project submission window. The Program Administrator will set a deadline by which prospective Approved Vendors will need to have submitted their registration form in order to submit projects for the initial submission window of a program year within any sub-program. This will be communicated via email and posted on the ILSFA website.

The Program Administrator will review and make approval decisions for all Approved Vendor applications. It is the responsibility of the Approved Vendor to respond to any questions or requests for additional information from the Program Administrator within two weeks of receiving such a request. Failure to respond to requests from the Program Administrator will constitute grounds for rejection as an Approved Vendor. Similarly, if a prospective Approved Vendor is found to have provided incorrect or misleading information within their Approved Vendor application, the Program Administrator reserves the right to grant a conditional approval of an application or outright reject an Approved Vendor application, as detailed below. Any Approved Vendor applications that are rejected will be provided a written explanation with the reasons for the rejection.

A Program Administrator's rejection of an Approved Vendor application may be appealed to the IPA and the opportunity to appeal will be communicated by the Program Administrator as part of its notice of rejection. To appeal to the IPA, the Approved Vendor should provide to the IPA a request for reconsideration in writing on company letterhead explaining its rationale for why it believes the Program Administrator's determination is in error, as well as sharing any supporting information, documents, or communications. The IPA may request additional information and materials from the Approved Vendor and/or seek to schedule a call or informal discussion with the Approved Vendor to learn more about the basis for their position. The IPA will endeavor to issue final determinations on eligibility, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal. If the final appeal determination is denied, applicants may reapply. but if approved, they will not be able to submit projects until the following program year.

The IPA and the Program Administrator reserve the right to conditionally approve applications from prospective Approved Vendors when those applications have areas of concern to the Program Team. A conditional approval will require six-month updates.

### 3.4. Registration Requirements and Scoring Rubric

Every question in the Approved Vendor registration process is allocated a maximum possible score. Some questions also include a minimum required score. Each question with a minimum score requirement is stated as such in the questionnaire. Failure to meet this minimum score requirement will disqualify the applicant. Explanations for each question indicate how the various scores will be evaluated and provide guidance for the applicant on how to achieve minimum scores or generally what

to expect with the evaluation of each question. The overall minimum score will vary by applicant based on their Approved Vendor type and the types of projects they plan to develop through the program. All applicants are required to achieve a minimum of 64% of points out of all possible points. For example, Approved Vendors not installing community solar projects would need a minimum of 41 out of a possible 64 points to qualify. Approved Vendors installing community solar projects would need a minimum of 54 out of a possible 85 points to qualify.

Applicants with insufficient or unclear information will be asked to provide additional, clarifying responses within ten business days of receiving the request from the Program Administrator. The Program Administrator may ask Applicants with scores below the minimum required scores for additional or clarifying information to satisfy areas that may lead to a qualified submission.

There are two different Approved Vendor Registration Application questionnaires: One for Approved Vendors, Designees, and Single Project Approved Vendors and a second for Aggregators. For clarity, individual questionnaires with attestations have been created for each Approved Vendor type. These forms are completed online at [www.IllinoisSFA.com](http://www.IllinoisSFA.com). Electronic versions of these questionnaires can be found below for reference:

- [ILSFA Approved Vendor Registration Form and Attestations](#)
- [ILSFA Aggregator Registration Form and Attestations](#)
- [ILSFA Designee Registration Form and Attestations](#)
- [ILSFA Single Project Approved Vendor Registration Form and Attestations](#)

### 3.5. Approved Vendor Support

All Approved Vendors are assigned an Approved Vendor Manager by the Program Administrator upon submitting a registration application. The Approved Vendor Manager will act as the single point of contact through the registration process as well as through project applications and ongoing ILSFA performance processes. Approved Vendor Managers will provide one-on-one support to applicants and Approved Vendors as needed. Applicants with insufficient registration submittals will receive guidance to correct inadequacies where possible.

### 3.6. Approved Vendor Conduct and Violation of Requirements

#### CODE OF CONDUCT

Approved Vendors and their Designees, subcontractors, representatives, and agents are expected to perform all work under the ILSFA program consistent with the highest technical and ethical standards in their industry. Participation in the ILSFA program is voluntary and comes with an obligation to provide high-quality and timely work, maintain and honor program-required system design parameters and warranties, work to gain customer satisfaction, and resolve disputes constructively. ILSFA Approved Vendors are expected to work with the Program Administrator in a responsive, forthright, and constructive manner. All Approved Vendors, installers, and subcontractors are expected to conduct any and all business affiliated with the ILSFA program a responsible manner that fosters integrity and public confidence. Work performed through ILSFA shall be in full compliance with all applicable building codes

and professional industry standards, as well as in accordance with all applicable federal, state and local laws, rules and regulations. Approved Vendors and their installers and subcontractors will maintain all required professional licenses or regulatory certifications and are expected to comply with all ILSFA program requirements.

## PROHIBITED ACTIVITIES

Approved Vendors and their representatives and agents are prohibited from:

- Engaging in fraud
- Misrepresenting program or project data to customers such as energy loads and bills, savings, and system production
- Misrepresenting information provided to the ILSFA Program Administrator, such as customer household eligibility information, installed equipment, shading analysis, and use of Qualified Job Trainees and subcontractors
- Deceiving or attempting to deceive customers or the Program Administrator about any fact or information pertaining to a project
- Forged or falsified paperwork – e.g., interconnection, permitting, zoning, tax returns, disclosures, DG Installer certification status
- Creating safety hazards or property damage resulting from poor workmanship
- Engaging in a pattern of poor workmanship or poor-quality professional services
- Taking any action to circumvent ILSFA quality control processes
- Refusing to honor program-required warranties
- Engaging in behavior that could result in financial harm to the customer

Whether any action, activity or omission violates or is prohibited by this policy shall be determined by the ILSFA Program Administrator in its sole discretion.

## VIOLATION OF PROGRAM REQUIREMENTS

The Program Administrator may at any time determine that an Approved Vendor is not acting or has not acted in compliance with program requirements and take disciplinary action. The cause for these disciplinary actions may include, but are not limited to, failure to meet consumer protections or marketing guidelines, repeated issues of installation quality, failure to meet job training requirements, consistent variances in system design from Part I to Part II project submission, customer complaints, or other areas of program compliance, as well as demonstrating a lack of responsiveness to the Program Administrator's and/or IPA's notices or requests for information.

If the Approved Vendor is deemed in violation of program compliance by the Program Administrator, the Program Administrator will notify the Approved Vendor through email providing details of the problematic behavior, describing how the behavior is non-compliant, and potentially requesting more information about the issue. The Approved Vendor will be requested to respond in a specific but reasonable timeframe to any such requests. After review of the response, the Program Administrator will determine whether or not disciplinary measures will be taken, and if so, what the disciplinary measures will be. Disciplinary measures may include changing the status of the Approved Vendor from active status to probationary status, or suspension of the Approved Vendor from the program. If an

Approved Vendor currently holds a probationary status and additional disciplinary actions are taken, that Approved Vendor will be suspended from the program. The duration of the status change or disciplinary action will be determined on a case-by-case basis based on the severity or consistency of the issues found in the determination.

The Program Administrator will provide a copy of the determination to the IPA. The Approved Vendor may appeal the disciplinary action in writing by providing the IPA a request for reconsideration on company letterhead that includes an explanation of why the Approved Vendor believes the determination was made in error. The Approved Vendor should include supporting information, documents, or communications that support its rationale. The IPA may request additional information and materials from the Approved Vendor, and/or seek to schedule a call or informal discussion with the Approved Vendor to learn more about the basis for the Approved Vendor's position and the Program Administrator's determination. The IPA will endeavor to issue final determinations on discipline, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information. The Adjustable Block Program's Disciplinary Actions Report, published December 2019, can be referenced [here](#).

## DISCIPLINE

A suspension under ILSFA is generally considered a suspension from conducting the activities defined below for the duration of the suspension. A suspension may be more limited in scope than what is described below, should circumstances warrant.

When the Program Administrator communicates that an Approved Vendor is suspended, the Approved Vendor is suspended from:

- Generating new disclosure forms
- Generating new project applications
- Moving forward on already generated disclosure forms and/or in process project applications
- Marketing of any kind regarding the Program on any platform (i.e., social media, organizational website, marketing and/or customer acquisition via outside marketing firms, etc.), including any statements implying the availability of program incentives through such marketing
- Using Program materials in customer acquisition outreach (e.g., Program Disclosure form, Program brochure, Program logo, etc.)
- Mentioning Illinois Solar for All or ILSFA while performing customer acquisition outreach, including any statements implying the availability of program incentives through outreach
- Partnering with an Approved Vendor and/or Designee in good standing to work around Program suspension

NOTE: The IPA will determine on a case by case basis whether an Approved Vendor suspended from participation in ILSFA will also be suspended from participation in the IPA's Adjustable Block Program (also known as Illinois Shines). However, an Approved Vendor suspended from the Adjustable Block Program will automatically be suspended from ILSFA.

When the Program Administrator communicates that a Designee is suspended, the Designee is suspended from:

- Generating new disclosure forms
- Moving forward on already generated disclosure forms
- Collaborating with the Designee's Approved Vendor(s) to convert Disclosure Forms into Project Applications
- Marketing of any kind regarding the Program on any platform (i.e. social media, organizational website, marketing and/or customer acquisition via outside marketing firms, etc.), including any statements implying the availability of program incentives through such marketing
- Using Program materials in customer acquisition outreach (e.g., Program Disclosure form, Program brochure, Program logo, etc.)
- Mentioning Illinois Solar for All or ILSFA while performing customer acquisition outreach, including any statements implying the availability of program incentives through outreach
- Partnering with an Approved Vendor and/or Designee in good standing to work around Program suspension

NOTE: As stated above, the IPA will determine on a case by case basis whether a Designee suspended from participation in ILSFA will also be suspended from participation in the IPA's Adjustable Block Program (also known as Illinois Shines). A Designee suspended from the Adjustable Block Program will automatically be suspended from ILSFA.

The Program Administrator will maintain a public report of disciplinary actions taken involving Approved Vendors/Designees that have found to have violated Program guidelines. This public report has been developed in the interests of fairness, transparency, and awareness to help ensure that all Approved Vendors/Designees are aware of disciplinary decisions, and thus do not unknowingly partner with Approved Vendors/Designees that are suspended from the Program. The report is also designed to provide information to potential project hosts, installers, and other interested parties.

## **3.7 Changes to Approved Vendors and Projects**

### **MULTIPLE APPROVED VENDORS**

In a case where one Approved Vendor submits a Part I application for a project, and then a second Approved Vendor submits a new Part I application for a project at the same location at any point in the review process prior to the submission of the batch to the ICC, the Program Administrator will proceed as follows in attempting to resolve the potential conflict:

The Program Administrator will first investigate (including potentially contacting the site host) whether there is an intent that the multiple project applications be for separate, co-located projects (and if so, whether the co-location would be allowed under Program terms and conditions).

- If co-location is intended and feasible, then the Program Administrator will allow for co-location.
- If co-location is not both intended and feasible (i.e., if the two applications appear to represent the same project), the Agency will review the documents submitted with the Part I applications to determine which Approved Vendor is premising its control of RECs on an earlier-executed site control agreement that has not lapsed (or, if both Approved Vendors rely on the same site control agreement, then which Approved Vendor has an earlier-executed REC control

agreement that has not lapsed); this Approved Vendor will be presumed to be the proper representative of the project.

- An Approved Vendor with a later-executed site control or REC control agreement (as applicable) will be given an opportunity to furnish documentation showing that the earlier-executed instrument was properly terminated prior to that Approved Vendor’s Part I ILSFA application. If acceptable documentation is provided (subject to confirmation with the other Approved Vendor), then the application from the Approved Vendor with the later-executed agreement would proceed (subject to any other review and approvals of the application).

## CHANGE OF APPROVED VENDORS

A project that has been waitlisted or otherwise not yet selected for a REC Contract may change its Approved Vendor. This switch of Approved Vendors may be for an individual project that is a subset of a larger batch (although minimum batch size requirements would still apply).

While it is not necessary to seek Program Administrator approval in advance of commencing this transaction, the Approved Vendor transferring the project and the Approved Vendor receiving the project (“Transferee”) must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ABP application. The documentation also must show that the project host (and the project owner, if different) consent to the change of Approved Vendor.

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being taken by the Transferee AV. The co-located pricing provision will only be applicable if the Illinois Commerce Commission’s approval of the second project is within one year or less of the Commission’s approval of the first project. If the first project has not yet received Commission approval at the time of the second project’s approval, then the co-located pricing provision will apply.

## SALE OF AN APPROVED VENDOR

Additionally, the sale of an Approved Vendor is permissible. A change in ownership of the Approved Vendor (e.g., the sale of an entire LLC to a new entity) with no change to the AV/project pairings does not require consent, but does require the Approved Vendor to alert the Program Administrator to the change and provide documentation of the sale.<sup>6</sup> The new owner will need to submit an Approved Vendor application with details specific to its ownership of the LLC (see Section 2 for more detail on Approved Vendor requirements). Additionally, the new owner must contact its contracting

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<sup>6</sup> The seller’s Approved Vendor profile and banking information will not be visible to the new owner of the Approved Vendor after a sale.



utility/utilities to update its contact and banking information for the respective REC contracts with the utility.

#### SALE OF A PROJECT

A sale of the project itself (or a majority equity share in the project) that results in a new system owner but not a new Approved Vendor is allowed while the project remains unselected for a REC Contract. In such a case, the Approved Vendor is expected to contact the Program Administrator in order to update the ownership data for the project in the ILSFA portal. This project ownership change would not change any previous determination that the project was co-located, and it could, if applicable, cause the project to be newly considered co-located. The co-located pricing provision will only be applicable if the Illinois Commerce Commission's approval of the second project is within one year or less of the Commission's approval of the first project. If the first project has not yet received Commission approval at the time of the second project's approval, then the co-located pricing provision will apply.

## 4. Project and Participant Eligibility

Eligibility for ILSFA varies by sub-program, with specific eligibility requirements for participants and project types. This section focuses on defining eligibility and prescribed methods for verifying that eligibility.

These differences require that each sub-program have distinct eligibility descriptions and verification processes. These guidelines will provide sub-program-specific details for project and participant eligibility requirements and the prescribed methods for collecting and verifying eligibility data. It is the responsibility of the Approved Vendor to ensure that these requirements are met and that prescribed processes are followed.

NOTE: A single project can be submitted to only one ILSFA sub-program in a given program year.

### 4.1. Distributed Generation

#### PROJECT ELIGIBILITY

- LIDG systems are installed onsite on residential properties.
- Systems are installed behind a customer's meter and are used to offset the load of one or more qualifying residential households occupying that property.

- The value of energy produced by the installed system is realized by occupants through:
  - Net metering or avoided usage connected directly to individual customer meters; or
  - Passed onto occupants indirectly through lowered rents, stabilized rents, or other benefits or services the value of which can be demonstrated by the property owner or manager, connected directly to the common meter of the building.
- All participants, with the exception of five-unit and larger buildings, pay no upfront costs (defined as prior to project energization) and any ongoing costs and fees are less than 50% of the value of the energy generated by the system in year one of the contract, as well as over the whole term of the contract. See section 5 of this manual, Participant Savings Requirements, for specific calculations of savings.
- The project meets all consumer protection guidelines and other program requirements.

## PARTICIPANT ELIGIBILITY

- For single-family homes, households must verify they are 80% or less of Area Median Income (AMI).
- For two- to four-unit buildings, at least two of the households must verify they are 80% or less of AMI.
- For five-unit and larger buildings, either 1) at least 50% of the households in the building must verify they are 80% or less of AMI, 2) the property qualifies for either US Department of Housing and Urban Development Project-Based Vouchers or Project-Based Rental Assistance, 3) the property meets the definition of Affordable Housing under the Illinois Affordable Housing Act, or 4) the property qualifies for Income Eligible Multifamily Energy Efficiency.
- For projects where tenants are renters, rather than homeowners, the tenants must have signed a lease and/or a similar arrangement to indicate long-term residency. Although they may provide temporary housing, service providers such as rehabilitation centers or shelters should apply in the Non-Profits/Public Facilities sub-program if applicable.

See the section 6, Project and Participant Verification, below for prescribed methods of verification.

## PARTICIPANT REFERRALS

A stakeholder engagement process completed in early 2021 informed the creation of a referral process for interested 1-4 unit building owners. The Program Administrator will begin using the following Approved Vendor Referral Process for 1-4 unit LIDG projects in April, 2021:

1. Approved Vendors interested in participating in the referral program will indicate interest to the Program Administrator by submitting a 1-4 unit building LIDG offer to [info@illinoisfa.com](mailto:info@illinoisfa.com) and agreeing to adhere to the applicable consumer protections (detailed below in Section 7.1).
2. Interested participants will indicate interest to the Program Administrator via the ILSFA website, email, call center, or other available communication channels.
3. Interested participants will be informed of the number of Approved Vendors participating in the referral program in their area, in addition to their offers. Interested participants will also be informed of how many outreach attempts they can expect from Approved Vendors 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 monthly and follow up with the potential participant if/when an applicable Approved Vendor becomes available.

4. Interested households will be pre-screened for income eligibility before participating in the referral process. This “pre-screening” consists of asking the potential participant to state their household income and household size.
5. Participants in the referral process will be asked to share basic information about their home (e.g., condition of the property’s roof and type of electrical panel) to assess their site suitability. Interested households can then agree to have their information shared with Approved Vendors.
6. The Program Administrator will compile all referral requests that complete the pre-screening process and provide them to participating Approved Vendors on a weekly basis.

Interested participants can choose to have their income verification performed by the Program Administrator before or after participating in the referral process, at the participant’s discretion. Participants can also choose to have their income verification completed by the Approved Vendor of their choice.

If participants choose to have their income verification performed by the Program Administrator, they can do so in one of three ways. Individual members of the same household, over the age of 18, may use different options to determine household income eligibility.

- **Option 1:** Provide proof of enrollment in a qualifying third-party program such as LIHEAP and SNAP. More details about qualifying third-party programs is available in Section 6: Project and Participant Verification.
- **Option 2:** Income verification through a credit reporting agency. This option requires providing basic personal information such as name, full DOB, and address, and, in some limited circumstances, social security numbers, to be entered in a credit reporting agency’s secure portal.
- **Option 3:** Income Affidavit: This form can be used when income documentation is required but not available, in cases such as cash income or no income. The Income Affidavit can only be used in limited circumstances and cannot be used if you are able to utilize Option 1 or Option 2.

To participate in the referral program, Approved Vendors are required to submit a standard offer to the Program Administrator which identifies the details of their service offering based on standard parameters. By submitting the standard offer, Approved Vendors agree to the following:

- Approved Vendors will contact the interested household within 5 business days of receiving a referral. Approved Vendors who will temporarily be unable to meet this expectation (due to vacation, illness, etc.) should notify the Program Administrator in advance.
- No information about 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.

- Calls and 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) may 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 at the discretion of the Program Administrator. Participation in this referral process is discretionary for the potential participant and for Approved Vendors.

Aggregated, anonymous information about the number, type (e.g., single family, pitched roof, etc.), and geography of referrals will be shared with all Approved Vendors on a regular basis to inform decisions by Approved Vendors about new markets; Approved Vendors may at any point submit a 1-4 LIDG offer and agree to adhere to the applicable consumer protections to participate in the referral process. Approved Vendors who wish to submit a standardized 1-4 LIDG offer should email [info@illinoisfa.com](mailto:info@illinoisfa.com).

## 4.2. Non-Profits/Public Facilities

### PROJECT ELIGIBILITY

- NP/PF sub-program projects are installed onsite on properties either (i) occupied by a qualified non-profit organization or (ii) occupied by a public entity.
- Systems are installed behind a customer's meter and used primarily to offset a single customer's load of the qualified non-profit or public entity.
- The value of energy produced by the installed system is realized by occupants through net metering or avoided usage connected directly to individual customer meters.
- Ongoing costs and fees are not to exceed 50% of the value of their share of energy generated by the system.
- The project meets all consumer protection guidelines and other program requirements.

### PARTICIPANT ELIGIBILITY

- Serves the energy loads of a building that is occupied by an organization (or in the case of a public facility, a department/agency) that is a CSP for the community (examples of CSPs are listed below).
- Is sited within an ILSFA-qualified LI communities or EJs within the state of Illinois:
  - EJs are identified through a methodology that multiplies the average of exposures and environmental effects with average socioeconomic factors. The calculation identifies the top 25% of qualifying census block groups across the state. [A map and address look-up tool](#) is available for every address in the state. [An additional process is available](#) for representatives of communities to apply to have their geographic area designated as an EJC even if the program's quantitative methodology did not so determine it.

- LI communities are defined as census tracts having a majority (50% or greater) of households at 80% or less of AMI. [A map and address look-up tool](#) ~~A map and address look-up tool~~ are available for every address in the state for these communities. Demonstrate one of the following:
  - Has sufficient connection to and input from the LI communities or EJC members the non-profit or public entity serves by:
    - Providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation, and Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation. **AND**
  - A qualified Critical Service Provider (CSP) defined as a non-profit or public entity that offers critical services to LI communities or EJs, including:
    - Advocacy organizations
    - Affordable housing providers
    - After-school providers
    - Childcare centers
    - Community centers
    - Community financial institutions (such as credit unions, non-profit lenders)
    - Disability service providers
    - Domestic Violence Centers
    - Emergency service agencies (fire, police, Red Cross)
    - Family support agencies
    - Food pantries
    - Homeless shelters
    - Hospitals, health care facilities, and clinics
    - Housing service providers
    - Immigration service providers
    - Job training and workforce development services
    - Law/legal centers (non-profit providing pro-bono services to LI communities)
    - Libraries
    - Mental and behavioral health facilities
    - Municipal administration offices
    - Places of worship
    - Rehabilitation providers
    - Public schools
    - Senior centers
    - Social service agencies (including unemployment and social security offices)
    - Transitional or supportive housing (including for teens and LGBTQ)
    - Women's or children's shelters
  - Documentation of CSP status must be submitted by no later than the time of Part I application.

- Other types of potential CSPs not found on this list can be reviewed by the Program Administrator on a case-by-case basis. Those considering submitting as an “other” CSP are advised to submit their requests as early as possible to the Program Administrator; these requests will be reviewed carefully and may not be granted. Requirements for CSP requests are outlined below.

## REQUIREMENTS FOR CRITICAL SERVICE PROVIDER REQUESTS

If a prospective non-profit or public entity is not represented within the list of Critical Service Providers (CSPs) above, the Approved Vendor or that entity may submit a request for consideration of that entity as a CSP. That request should be in the form of a letter to be reviewed by the Program Administrator on a case-by-case basis. Please note that only non-profits and public entities demonstrating a high degree of critical services provision to LI communities or EJCs will be designated as CSPs. The list of CSPs contained in the Approved Vendor Manual was developed through a process that included stakeholder feedback and is intended to be a comprehensive list of appropriate organizational types. The process of requesting consideration for other entities is to recognize that there may be special circumstances where an entity type was not included on that list but may be worth of consideration. Approval of a request by the Program Administrator must be received prior to an Approved Vendor submitting a project application for that entity or the application will be deemed ineligible for consideration.

Letters requesting CSP status for non-profits and public entities must include all of the following:

1. A description of the services provided by the non-profit or public entity, and a description of the program(s) through which the non-profit or public entity offers the services it asserts should be considered critical services. This should include the following, as applicable:
  - The nature of the critical services provided
  - The population served by the critical services (demographics, location, size, etc.)
  - The manner in which recipients access the critical services (i.e., application process, qualifications, enrollment period, etc.)
  - Who delivers the services (e.g., social worker, clinician, tradesperson, educator, etc.)
  - Whether the critical services accessed onsite and, if not, where are the services provided/accessed (e.g., mobile services using trucks)
  - Critical services program (goals, origin/date program started, partner agencies/entities and roles, outlook)
  - Portion of the entity’s work that is the provision of critical services. Please provide a description, if applicable, of the non-critical services provided by the entity.
2. An explanation of how the proposed PV system will bolster the impact and delivery of the critical services to the LI communities or EJCs.
3. Supporting documentation such as relevant metrics demonstrating the impact of the critical services, as applicable.

In order to determine if the entity demonstrates a high degree of critical services provision to LI communities or EJCs the Program Administrator will review information provided in the request letter

and accompanying materials. The Program Administrator's determination will be based on whether the prospective entity provides services that can be considered critical services because those services improve living conditions, financial status, environmental and health status, and other social welfare indicators. The review will consider the services offered, their alignment with and ability to meet identified needs, how accessible they are, and the organization's role, and impact in delivering the critical services. In general, the critical services should represent a majority of the activities performed by the organization. Where there are gaps in the information provided or questions about the request, the Program Administrator will send a written request for clarification.

The letter should be submitted on the letterhead of the non-profit/public entity and signed by an officer of the organization. It may be submitted directly by the entity or by an Approved Vendor the entity is working with. Please submit the letter to the Program Administrator at least 15 business days in advance of a project submittal to allow for adequate review time. Once a letter is received, the Program Administrator will either approve the application or will communicate any deficiencies to the requesting entity. If the CSP request is denied, an appeal of that determination may be made to the IPA.

## 4.3. Community Solar

### PROJECT ELIGIBILITY

- LICs sub-program projects are installed on rooftops or ground-mounted.
- Systems are connected directly to the utility side of the meter.
- The value of energy produced by the installed system is realized by occupants through bill credits as a subscriber to a community renewable generation project.
- Participants, with the exception of non-residential anchor tenants, pay no upfront costs and ongoing costs and fees are not to exceed 50% of the value of their share of energy generated by the system. See section 5 of this manual, Participant Savings Requirements, for specific calculations of savings.
- The project meets all consumer protection guidelines and other program requirements.
- The project must demonstrate community engagement by:
  - Providing a narrative summary of efforts taken prior to the application to conduct community outreach, education, and recruitment, and
  - Listing community-based organizations (as defined in Section 8.6.2 of the Revised Plan) the applicant has partnered with regarding the location of, development of, and participation in the project as well as regarding the priorities and concerns of LI community members. This should include letters from those organizations to verify the partnerships.
  - A public entity may qualify as a community-based organization for this purpose, but only if the public entity meets the following requirements:
    - The public entity must represent a municipality or county (or school district, park district, etc.) in a municipality or county in the bottom 25% of the state by population.
    - The public entity must certify that no local community-based organizations exist that are capable of filling this role.

- The public entity must provide the same showing of robust community engagement as a non-public entity would be required to show.
- Public entities that have failed to act as community-based partners in a past project certification would be ineligible.
- The public entity would be qualified as a “community-based organization” only in the context of one project application; the qualification would not be retained for a future project application (the public entity would need to demonstrate the same factors again). Finally, the public entity must provide ongoing reporting of its engagement approach, including public participation opportunities and disclosure of its approach to the project location selection (if applicable).

## PARTICIPANT ELIGIBILITY

- No subscriber can have a share greater than 40%.
- A single anchor tenant that is not a low-income household (as defined below) will be allowed. In this instance, the application should describe that anchor tenant in detail. The anchor tenant’s share will receive the applicable Adjustable Block Program REC price; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA LICs price. The anchor tenant must be identified at the time of the Part I application; if not, the project will not be allowed to add an anchor tenant after the close of the project submission window or relevant cure period.
- Other than the anchor tenant, all subscribers must be low-income households (defined as residential households that verify as 80% or less of AMI) in order to receive REC payments for those subscription shares. Any unsubscribed shares or any shares subscribed by subscribers that are not low-income households (outside the single anchor tenant’s subscription) as of one year after energization will receive no REC payments and Approved Vendors are not obligated to deliver those RECs.
- At least 50% of total energy produced, excluding the anchor tenant’s share (e.g., if the anchor tenant’s share is 30% of the project capacity, then at least 35% of total energy produced), must be allocated to low-income subscribers at the end of the first year after energization.
- Subject to the requirements above, any retail electricity customer in that utility’s territory can subscribe to the remaining shares.

Note, in the course of marketing, soliciting and subscribing customers, Approved Vendors and/or their Designees, subcontractors, or agents, may obtain confidential, proprietary, or otherwise generally non-public information from subscribers or potential subscribers. This information may include the subscriber or potential subscriber’s utility account number, utility account customer of record name, meter number, or other confidential information. Approved Vendors, Designees, subcontractors, and agents shall maintain the confidentiality and security of all such information received from subscribers and potential subscribers. Furthermore, Approved Vendors, Designees, subcontractors and agents shall not release such information to any other person or entity without the written consent of the subscriber or potential subscriber. This restriction shall not apply to the necessary sharing of such information between an Approved Vendor and its Designees, subcontractors, or agents in order to enroll a community solar subscriber, nor shall it apply to



requests from the Program Administrator and/or the Agency as needed for program administration. Approved Vendors and Designees who violate this program requirement, either directly or through the conduct of a subcontractor or agent, may be subject to disciplinary action, including possible suspension from the ILSFA Program.

## 5. Participant Savings Requirements

Approved Vendors must demonstrate that any ongoing costs and fees paid by the participant will not exceed 50% of the value of energy generated by the participant's share of the PV system. Except in the case of a project in the NP/PF sub-program where the project's owner is applying for the federal Investment Tax Credit in relation to the project installation, or if it will apply for the Investment Tax Credit, then the savings level for the participating host of the project must be 65% of energy value rather than 50%.

The method for calculating savings will vary depending on several factors, including the contract terms, system design, customer rates, the applicable net metering tariff, as well as whether customers receive benefits through net metering or indirectly through other means (as for master-metered multifamily buildings).

The formula for calculating savings in dollars is based on subtracting the total costs and fees from the Total Energy Value received by the customer.

$$\text{Total Energy Value} - \text{Total Costs and Fees} = \text{Savings Dollars}$$

The Savings is then calculated as a percentage of the Total Energy Value to establish a Percentage Savings, which must be at least 50% of the Total Energy Value (with the exception noted above).

$$\frac{\text{Savings Dollars}}{\text{Total Energy Value}} = \text{Savings \%}$$

### 5.1. Term of Savings

The Savings will be calculated twice, for the first year and for the term of the customer's contract with the installer or vendor. Both must meet the requirement that total costs and fees are no more than 50% of the energy value, except in the case of a non-profit or public facility project where the project's owner is applying for the federal investment tax credit, in which case the savings level for the participating host must be 65% of the energy value. For example, if a PPA term is 15 years, First Year Savings is calculated using total costs and fees incurred in the first year and Total Energy Value projected for the first year. Savings is then calculated using total costs and fees for the 15-year term and Total Energy Value projected for the 15-year term.

For system purchase or if, for example, a PPA included a buy-out at the end of the 15-year term, the Total Energy Value can be extended to the life of the system, which is assumed to be 25 years. Any additional cost to buy the system would be added, as well.

## 5.2. Calculating Total Costs and Fees

Total Costs and Fees are calculated by first multiplying a customer's total monthly (or other periodic) payments by the frequency of payments during the first year and then over the entire period of the agreement. For a PPA, this would mean multiplying the projected number of kWhs produced by the agreed purchase rate. For a lease agreement, this would mean multiplying the lease payment by the frequency of payments in the first year and again for the term of the lease. A system purchase using a loan or installment agreement would work in the same way. In all cases, any customer payment rate escalation, discussed in Section 5.3 below, must be accounted for.

Any additional, non-recurring fees (which cannot be incurred prior to energization), like a loan origination fee or an automated clearinghouse fee, are added to the first-year total if incurred during that time, as well as the full-term total. Late payment or returned check fees are not included in the calculation.

## 5.3. Escalation and Degradation Rates

- A standard annual production degradation rate of 0.5% is used for all calculations.
- An annual energy price escalation rate of no more than 1.7% can be used.
- The annual customer payment rate escalation can be no more than the energy escalation rate used.

## 5.4. Savings Calculations

As an example, we can calculate savings for a PPA agreement where the customer pays \$0.05 per kW hour over 15 years. Assume the project would produce 3,000 kWh in the first year (this would be true for a size of approximately 2 kW and a capacity factor of approximately 17%).

### First year savings:

- Total costs: 3,000 kWh x \$0.05 = **\$150.00**
- Total Energy Value: 3,000 kWh x \$0.1248<sup>7</sup> = **\$374.40**

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<sup>7</sup> A sample rate is used here (and in the full-term savings examples below) to demonstrate potential savings. Approved Vendors should use the rate given in the disclosure form based on the utility territory in which the project is located or, for customers using an ARES or enrolled in an hourly pricing program, an average rate based on 12 months of customer bills may be used. For NP/PF customers, the average rate based on 12 months of customer bills must be used. Where a facility does not have a year of electric usage history (e.g., a new building),

- Total Savings Dollars = \$374.40 - \$150.00 = **\$224.40**
- Total Savings %: \$224.40 ÷ \$374.40 = **59.9%**

**Full term savings:** Assuming a 15-year contract term, 0.5% annual production degradation, 1.7% annual energy rate escalation, and 1.0% annual customer rate escalation.

- Total costs: 43,459 kWh x \$0.05<sup>8</sup> = **\$2,329.66**
- Total Energy Value: 43,459 kWh x \$0.1248 = **\$6,109.47**
- Total Savings Dollars = \$6,109.47 - \$2,329.66 = **\$3,779.81**
- Total Savings %: \$3,779.81 ÷ \$6,109.47 = **61.9%**

If, for example, the PPA included a buy-out at the end of the 15-year term, the total energy value can be extended to the life of the system; i.e. 25 years. Any additional cost to buy the system would be added, as well. For example:

**Full term savings:** Assuming a 15-year contract term, 0.5% annual production degradation, 1.7% energy rate escalation, and 1.0% customer rate escalation, with a \$1 system buy-out at the end of the contract term.

- Total costs: (43,459 kWh x \$0.05) + \$1 system buyout = **\$2,330.66**
- Total Energy Value: 70,668 kWh x \$0.1248 = **\$10,828.97**
- Total Savings Dollars = \$10,828.97 - \$2,330.66 = **8,498.31**
- Total Savings %: \$8,498.31 ÷ \$10,828.97 = **78.5%**

**TABLE. 5.1. COST AND SAVINGS CALCULATION EXAMPLE**

<u>Year</u>	<u>Annual kWh</u>	<u>Energy rate per kWh</u>	<u>Energy value</u>	<u>Customer rate per kWh</u>	<u>Customer payments</u>	<u>Customer Savings \$</u>	<u>Customer Savings %</u>
<u>1</u>	<u>3,000</u>	<u>\$0.1248</u>	<u>\$374.40</u>	<u>\$0.0500</u>	<u>\$150.00</u>	<u>\$224.40</u>	<u>59.9%</u>
<u>2</u>	<u>2,985</u>	<u>\$0.1269</u>	<u>\$378.86</u>	<u>\$0.0505</u>	<u>\$150.74</u>	<u>\$228.12</u>	<u>60.2%</u>
<u>3</u>	<u>2,970</u>	<u>\$0.1291</u>	<u>\$383.38</u>	<u>\$0.0510</u>	<u>\$151.49</u>	<u>\$231.89</u>	<u>60.5%</u>

the Approved Vendor should use the rate of the new service and estimate kWh usage from the facility’s architect/engineer. The Approved Vendor should provide the methodology for load estimation in the project application.

<sup>8</sup> \$0.05 here and \$0.1248 in the next line (as well as the same figures included in the “Full term savings” calculation below) are first-year values before escalation; the actual calculation that results in \$2,329.66 would be based on multiplying 43,459 kWh by the average customer rate over the 15-year period in question (approximately the Year 8 value of \$0.0536 shown in Table 5.1).

<u>4</u>	<u>2,955</u>	<u>\$0.1313</u>	<u>\$387.94</u>	<u>\$0.0515</u>	<u>\$152.24</u>	<u>\$235.70</u>	<u>60.8%</u>
<u>5</u>	<u>2,940</u>	<u>\$0.1335</u>	<u>\$392.57</u>	<u>\$0.0520</u>	<u>\$152.99</u>	<u>\$239.57</u>	<u>61.0%</u>
<u>6</u>	<u>2,926</u>	<u>\$0.1358</u>	<u>\$397.24</u>	<u>\$0.0526</u>	<u>\$153.75</u>	<u>\$243.49</u>	<u>61.3%</u>
<u>7</u>	<u>2,911</u>	<u>\$0.1381</u>	<u>\$401.98</u>	<u>\$0.0531</u>	<u>\$154.51</u>	<u>\$247.47</u>	<u>61.6%</u>
<u>8</u>	<u>2,897</u>	<u>\$0.1404</u>	<u>\$406.77</u>	<u>\$0.0536</u>	<u>\$155.28</u>	<u>\$251.49</u>	<u>61.8%</u>
<u>9</u>	<u>2,882</u>	<u>\$0.1428</u>	<u>\$411.61</u>	<u>\$0.0541</u>	<u>\$156.04</u>	<u>\$255.57</u>	<u>62.1%</u>
<u>10</u>	<u>2,868</u>	<u>\$0.1452</u>	<u>\$416.52</u>	<u>\$0.0547</u>	<u>\$156.82</u>	<u>\$259.70</u>	<u>62.4%</u>
<u>11</u>	<u>2,853</u>	<u>\$0.1477</u>	<u>\$421.48</u>	<u>\$0.0552</u>	<u>\$157.59</u>	<u>\$263.89</u>	<u>62.6%</u>
<u>12</u>	<u>2,839</u>	<u>\$0.1502</u>	<u>\$426.50</u>	<u>\$0.0558</u>	<u>\$158.37</u>	<u>\$268.13</u>	<u>62.9%</u>
<u>13</u>	<u>2,825</u>	<u>\$0.1528</u>	<u>\$431.58</u>	<u>\$0.0563</u>	<u>\$159.16</u>	<u>\$272.43</u>	<u>63.1%</u>
<u>14</u>	<u>2,811</u>	<u>\$0.1554</u>	<u>\$436.73</u>	<u>\$0.0569</u>	<u>\$159.94</u>	<u>\$276.78</u>	<u>63.4%</u>
<u>15</u>	<u>2,797</u>	<u>\$0.1580</u>	<u>\$441.93</u>	<u>\$0.0575</u>	<u>\$160.74</u>	<u>\$281.19</u>	<u>63.6%</u>
			<b><u>\$6,109.47</u></b>		<b><u>\$2,329.66</u></b>	<b><u>\$3,779.81</u></b>	<b><u>61.9%</u></b>
<i>Buyout Fee at End of Contract</i>							
<i>Term</i>					<u>\$1.00</u>		
<u>16</u>	<u>2,783</u>	<u>\$0.1607</u>	<u>\$447.19</u>	<u>\$0.0580</u>	<u>\$0.00</u>	<u>\$447.19</u>	<u>100.0%</u>
<u>17</u>	<u>2,769</u>	<u>\$0.1634</u>	<u>\$452.52</u>	<u>\$0.0586</u>	<u>\$0.00</u>	<u>\$452.52</u>	<u>100.0%</u>
<u>18</u>	<u>2,755</u>	<u>\$0.1662</u>	<u>\$457.91</u>	<u>\$0.0592</u>	<u>\$0.00</u>	<u>\$457.91</u>	<u>100.0%</u>
<u>19</u>	<u>2,741</u>	<u>\$0.1690</u>	<u>\$463.37</u>	<u>\$0.0598</u>	<u>\$0.00</u>	<u>\$463.37</u>	<u>100.0%</u>
<u>20</u>	<u>2,727</u>	<u>\$0.1719</u>	<u>\$468.89</u>	<u>\$0.0604</u>	<u>\$0.00</u>	<u>\$468.89</u>	<u>100.0%</u>
<u>21</u>	<u>2,714</u>	<u>\$0.1748</u>	<u>\$474.48</u>	<u>\$0.0610</u>	<u>\$0.00</u>	<u>\$474.48</u>	<u>100.0%</u>
<u>22</u>	<u>2,700</u>	<u>\$0.1778</u>	<u>\$480.13</u>	<u>\$0.0616</u>	<u>\$0.00</u>	<u>\$480.13</u>	<u>100.0%</u>
<u>23</u>	<u>2,687</u>	<u>\$0.1808</u>	<u>\$485.85</u>	<u>\$0.0622</u>	<u>\$0.00</u>	<u>\$485.85</u>	<u>100.0%</u>
<u>24</u>	<u>2,673</u>	<u>\$0.1839</u>	<u>\$491.64</u>	<u>\$0.0629</u>	<u>\$0.00</u>	<u>\$491.64</u>	<u>100.0%</u>
<u>25</u>	<u>2,660</u>	<u>\$0.1870</u>	<u>\$497.50</u>	<u>\$0.0635</u>	<u>\$0.00</u>	<u>\$497.50</u>	<u>100.0%</u>
			<b><u>\$10,828.97</u></b>		<b><u>\$2,330.66</u></b>	<b><u>\$8,498.31</u></b>	<b><u>78.5%</u></b>

## 5.5 Determining the Energy Rate

A critical factor in determining customer savings is the customer's Net Metering Rate. For residential, LIDG customers, the rate per kWh is listed on the Disclosure form for those customers not using an Alternative Retail Electric Supplier (ARES) and not enrolled in an hourly pricing program. Similarly, the LICs Disclosure form also lists the rate per kWh for each utility.

For customers using an ARES or enrolled in an hourly pricing program, and for NP/PF customers, an average rate based on 12 months of customer bills must be used. Where a facility does not have a year of electric usage history (e.g., a new building), the Approved Vendor should use the rate of the new service and estimate kWh usage from the facility's architect/engineer or another source, such as a utility estimate. The Approved Vendor should also provide the methodology for load estimation in the project application. This method may also be used for any customer to provide a more accurate projection of cost and savings.

For customers whose electricity is supplied through their municipality or a co-op, the Approved Vendor should likewise use the average rate based on 12 months of customer bills. If the Approved Vendor is not able to use the 12-month average, the statewide average of \$0.1248 per kWh can be used.

When establishing the Net Metering Rate using customer bills, the most recent average of 12 consecutive months of customer bills within the last two years should be used. The rate should include all volumetric charges (costs per kWh), including for Supply, Transmission, Delivery, and volumetric taxes. The sum of these cost components should be averaged per kWh over this 12-month period to get the average customer rate. Non-volumetric taxes and fees should not be included.

For LICs residential customers, only the Supply rate is averaged over 12 months. For those customers who have a commercial rate of 100 kW or more, Supply and Capacity are averaged over 12 months.

For multifamily buildings that are multi-metered, with bill credits sent to tenants' electricity bills, the Net Metering Rate used should be calculated in the same way, but only the Supply rate should be used based on the property owner's current rate. For master-metered building or for multifamily buildings where the installation will serve only the common load, the full retail rate will be credited, and the average Net Metering Rate will be calculated accordingly. For such a building where the central utility account has already elected to receive the "smart inverter rebate" under ComEd's Rider DG Rebate or Ameren Illinois' Rider CGR), net metering rates will be calculated using only the Supply rate.

In general, the intent is that an accurate projection of the customer's Net Metering Rate should be used in calculating bill credits and savings.

## 5.6. Tangible Benefits and Value to Participants

In most instances, the value realized by program participants will be through net metering in the various ways described above. The value changes based on their rate, the type of net metering, and other system factors, but is generally calculated as described above. In instances where DG projects are installed on master-metered buildings, the property owner installs the system and receives net metering benefits on behalf of all tenants/participants and must demonstrate that at least half of the Total Energy

Value received is being passed onto tenants. Note that, when a master-metered building is a community solar subscriber, the property owner is required to demonstrate that the required savings value is being passed on to tenants in order to be considered a low-income residential household and have the RECs associated with its subscription share paid at the ILSFA LICs price. Also note that, because small subscriber adders are calculated at the account level, they are only applied if the master metered building is less than 25kW. Approved Vendors are required to submit income verification for tenants of a master metered building following the same guidelines outlined in Section 6.3 of this manual. A master-metered building may participate as an anchor tenant without this requirement and receive the applicable Adjustable Block Program REC price.

When DG projects are installed on master-metered buildings, the value is calculated in the same way as any other DG project. However, the benefits realized by tenants/participants are indirect. The most common ways this can be passed onto participants is through lowered rents, stabilized rents, or other services to tenants.

For example, where a property realizes \$10,000 annually in net metering value, at least \$5,000 of that must be passed onto tenants. If, for example, the property owner's savings is \$6,000, only \$5,000 must be passed onto tenants, with the remaining \$1,000 being savings realized by the property owner. If the property has ten tenants, each must see \$500 in value annually or approximately \$42 per month. This can be demonstrated in several ways and is not limited by the examples below:

- Lease agreements can show a reduction in monthly payment by \$42 per month.
- Any rent increases can be forgone in subsequent years. The property owner should provide data on the average dollar amount of increases in recent years to support and quantify subsequent rent freezes or reduced rent increases.
- The property owner can provide other services, like internet service, free laundry, or other services valued at \$42 per tenant per month or more. Documentation will need to be submitted that details the services being offered and their value.
- Where tenant rents and/or utilities are subsidized based on a percentage of income (for example HUD Section 8 or other programs that provide subsidies in a way that ensures housing and utility costs are 30% of income), the property owner should find ways to pass value to tenants that do not affect rent or utility payments to ensure the benefits are realized directly.

## 6. Project and Participant Verification

### PARTICIPANT DATA COLLECTION OVERVIEW

ILSFA requires that data for all program participants be collected and shared with the Program Administrator. This includes all property owners, single-family occupants, tenants of multifamily properties counting toward eligibility (minimum is 50%), all subscribers to community solar projects and all non-profit or public entities receiving benefits through ILSFA-energized systems. A Certification and Consent Form (Basic Information Form) is completed for each applicant. This data will be used for validation of eligibility as well as for measuring program performance, including program reporting and

periodic participant satisfaction surveys. Applicant data is captured through the vendor portal at [www.IllinoisSFA.com](http://www.IllinoisSFA.com) as part of the project approval process during Part I of the project application. Subscriber data for LICS projects is submitted during Part II. Annual submissions are also required for additional subscriber data and qualified subscriber shares to be updated.

Prospective participants may also work with the Program Administrator to complete a Certification and Consent form and determine income-eligibility. Prospective participants that have been determined as income-eligible will receive an Income Verification Approval Letter and those eligible and interested in the 1-4 unit building LIDG program will be referred to Approved Vendors as described in the referral process in Section 4.1.: Distributed Generation.

Approved Vendors working with prospective participants that have been verified as income-eligible through the Program Administrator will accept the prospective participant's Income Verification Approval Letter rather than the documentation described below. The Income Verification Approval Letter will need to be uploaded as described in section 8.4. Part I Project Approval: Customer Data.

## INCOME DEFINITION

For purposes of eligibility validation, income is defined as the total income of all household members over the age of 18 based on the most recent IRS 1040 form. Income reported on the 1040 form includes:

- Gross wages, salaries, commissions, sick pay, and tips
- Taxable interest
- Dividends
- Taxable refunds, credits, or offsets of state and local income taxes
- Social Security (SSA) or Disability (SSI)
- Veterans (VA) benefits
- Unemployment benefits
- Alimony (or separate payments) received
- Business or self-employment income (or loss)
- Taxable amount of pension, IRA, and annuity payments
- Lottery income
- Rental real estate, royalties, partnerships, and S Corporations or trusts
- Farm income (or loss)

## OTHER INCOME

In addition to the income reported on the 1040 form, the following are also considered income for participation in ILSFA:

- Annuities
- Armed Forces allotments and allowances for housing, food, and clothing
- Cash gifts, including "GoFundMe" or other crowdfunding platforms
- Child support

- Commission checks (those that cover more than one month should be divided by the appropriate number of months to equal the 30-day income requirement)
- Educational Stipends
- Federal Black Lung Benefits
- Gambling proceeds and/or annual gross income should not exceed the annual 150% income eligibility
- General Assistance
- Regular payments from an Individual Retirement Account
- Online income (income received from online sales websites such as eBay for profit)
- Rental income – counted if the applicant rents property outside his/her own household or the applicant shares his/her home, e.g., one household unit with a boarder, lodger, and/or renter who is NOT related)
- Social Security income received for a spouse that resides in a nursing home/assisted living facility that is not paid directly and completely to the facility
- Strike benefits
- Support income received for guardianship and/or adoption of child(ren)
- Worker’s Compensation

#### THE FOLLOWING ARE NOT CONSIDERED INCOME :

##### **Ancestry-Related:**

- Payments received under the Alaska Native Claims Settlement Act
- Payments to certain United States citizens of Japanese ancestry and resident Japanese aliens and certain eligible Aleuts made under P.L. 100-383
- Payments under P.L. 103-286 to persons due to their status as victims of Nazi persecution

##### **Assets:**

- Withdrawals from a bank (or other financial institution), such as individual savings accounts
- 401k or retirement funds (one-time withdrawal)
- Loans (including student loans)
- Money received from a reverse mortgage (but can be used as proof of “regular monthly support” for Zero Income applicants)
- Sale of house or car
- Sale of household items/assets at yard sales, on eBay, or other online sites is not income when household items are sold occasionally, but is proof of how all or part of the household’s monthly expenses were paid
- Sale of property
- Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970



- Tax refunds, including Earned Income Tax Credit (EITC) payments, whether received as an advance payment with wages or as part of an income tax refund

**Benefits:**

- Supplemental Nutrition Assistance Program (SNAP) benefits (Food Stamps)
- Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits
- Earned or Unearned income of dependent minors (children under 18 years of age)
- National School Lunch Program (NSLP) free or discounted lunches
- Money received from the Social Security Administration under a Plan to Achieve Self-Support (PASS)

**Educational:**

- Scholarships, subsistence amounts (BAS on paystub – an allowance paid to Veterans while they pursue an educational or training program), GI Bill benefits
- Federal student aid (grants or loans to undergraduate students made or insured under programs administered by the Department of Education)
- Income from work study programs

**Foster Care (Note: do not count foster children as household members):**

- Foster Parent Reimbursement
- Foster Grandparents/Senior Companion Stipend – any payment to volunteers in programs under Title II of the 1973 Domestic Volunteer Services Act; examples of these programs include RSVP and Foster Grandparents

**Indian Tribes:**

- Tribal per-capita payments up to \$2,000 per person per year, including payments made of income from tribal lands, payments made of tribal judgment trust funds, and any other source except gaming revenues
- Income derived from certain sub marginal land of the United States that is held in trust for certain Indian tribes
- Income received from the disposition of funds to the Grand River Band of Ottawa Indians
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of the Yakima Indian Nation or the Apache Tribe of the Mescalero Reservation
- Payments to the Passamaquoddy Tribe and the Penobscot Nation or any of their members made under the Maine Indian Claims Settlement Act of 1980
- Payments of relocation assistance to members of the Navajo and Hopi Tribes made under P.L. 93-531

**Title I:**

- Earnings, allowances, and payments received under Title I of the National and Community Service Act of 1990 are exempt; the programs in the Act are:
  - Serve America, Higher Education Innovative Projects, American Conservation and Youth Corps Programs, Community Service Programs, and AmeriCorps State/National
- Payments made under Title I of the 1973 Domestic Volunteer Services Act (AmeriCorps VISTA, University Year for Action, and Urban Crime Prevention Program) are exempt if the person was receiving SNAP or cash benefits from TANF, GA, or AABD at the time they joined AmeriCorps VISTA.
  - A temporary interruption in SNAP/Food Stamps does not change the status of exempt AmeriCorps VISTA payments.
- Income from employment through Workforce Innovation and Opportunity Act (WIOA), including Job Corps

**Title V:**

- Senior Temporary Training Program; payments received from the Community Service Employment Program funded under Title V of the Older Americans Act (such as the Experience Works Program, formerly called Green Thumb)

**Veterans:**

- Payments made to veterans who receive an annual disability payment or to the survivors of deceased veterans who receive a one-time, lump sum payment from the Agent Orange Settlement Fund or any other fund referring to Agent Orange product liability under P.L. 101-201
- Monetary allowances for certain children of Vietnam War veterans (children born with the congenital defect spina bifida and with certain birth defects)
- Additional payments received by military personnel for serving in a combat zone
- Veteran's Administration Pension Benefits for Aid and Attendance

**Other:**

- Disaster relief payment made by federal, state, or local government or by a disaster assistance group
- Gifts in the form of non-cash assistance, e.g., food, clothing, rent, etc.
- Life insurance proceeds (whether made in installments or paid upfront)
- Non-cash income
- One-time insurance payments or compensation for injury
- One-time payments, excluding cash gifts, e.g., Death Benefits, Circuit Breaker Benefits, jury duty, retroactive child support, SSI, SSA, UCB

- Matched funds that are deposited into an Individual Development Account (IDA) from a unit of state or local government or through contributions made by a not-for-profit entity are exempt income
  - Funds deposited into the IDA remain exempt as long as the IDA is maintained
- Payments made to others on the household's behalf provided that such payments were not directed by the household; e.g., bills paid or purchases made by others
- Payments made through the Victims of Crime Act of 1984
- Payments for Vocational Rehabilitation transportation and maintenance

#### **Trade Readjustment Allowance Department of Labor- Employment and Training Administration**

- Payments made under the YouthBuild Program (P.L. 102-550)
- Reimbursement for other expenses incurred; e.g., medical expenses
- Utility payments from a Public Housing Authority, whether paid directly to the unit or to the utility company

#### **INCOME INCLUDED IN VERIFICATION**

For purposes of verification, the income of all members of the household who are over 18 years old and reported earned income will be considered, including:

**Temporarily absent family members:** The income of temporarily absent family members is included regardless of the amount the absent family member contributes to the household. For example, a construction worker employed at a temporary job in a different part of the state earns \$600 per week. She keeps \$200 per week for expenses and sends \$400 per week to her family. The entire amount (\$600 per week) is counted in the family's income.

**Adult students living away from home:** If the adult student is counted as a member of the household in determining the household size (to compare against the income limits), the first \$480 of the student's annual income must be counted in the family's income. Note, however, that the \$480 limit does not apply to a student who is the head of household or spouse (their full income must be counted).

#### **INCOME NOT INCLUDED IN VERIFICATION**

**Minors:** Earned income of minors (age 17 and under) is not included.

**Income of live-in aides:** If a household included a paid live-in aide (whether paid by the family or social service program), the income of the live-in aide, regardless of the source, is not counted and that person is not counted toward the total number of household members. A related person cannot be considered a live-in aide without the review and approval of the Program Administrator.

**Permanently absent family members.** If a family member is permanently absent from the household (e.g., a spouse who is in a nursing home), the head of household may only count that person, and their income, as a member of the household if they are included on tax returns or pre-qualifying third-party programs. Note: A household consists of all people living in one housing unit and all income of each adult household members must be documented and counted toward the household income.

## PROPERTY OWNERSHIP VERIFICATION

For LIDG and NP/PF projects, property owners contract directly with the Approved Vendor or their agents or subcontractors for the installed solar. Property ownership must be verified by obtaining a copy of the current mortgage or property tax statement. In the LIDG sub-program, income must be verified for households counting toward eligibility (minimum is 50% for multi-family), whether property owners or tenants, unless the project is using Whole Building Certification (see Section 6.1.1) to verify eligibility.

## INCOME VERIFICATION

To reduce the burden on program participants and the Program Administrator, and to mitigate the risk of storing sensitive personal information, a tiered approach is used for applicant income verification for LIDG and LICS projects. The NP/PF sub-program does not qualify applicants based on income and requires a different approach to eligibility verification. The tiered approach ensures the least invasive methods are tried first, moving progressively through alternate methods until income eligibility is determined.




There are four methods of income verification allowed for LIDG and LICS sub-program projects that differ depending on sub-program. It is the responsibility of applicants to certify their eligibility. While the Program Administrator acts as the central source for income validation, and potential subscribers to LICS projects may request to have their income verified by the Program Administrator directly, Approved Vendors have the primary responsibility of verifying the eligibility of individual applicants. The Approved Vendor will follow the tiered methods of income verification appropriate for each sub-program. The Approved Vendor will provide the verification documentation required for each applicant or qualified building according to the methods prescribed below. Regardless of the verification method or sub-program, the applicant will first certify eligibility by confirming they currently meet household annual income eligibility. Once certified, the Approved Vendor will collect the prescribed documentation to verify the eligibility of the applicant. The Program Administrator will then validate the findings.

Note: The documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, Approved Vendors will need to redact PII on all documents before submitting them to the Program Administrator in the Approved Vendor Portal. More instructions for redacting PII are included in Sections 6.1 and 6.3 below.

### METHOD A: THIRD-PARTY QUALIFYING PROGRAM VERIFICATION

There are a number of existing programs, including housing and energy assistance programs, in which income eligibility is equivalent to or stricter than that of ILSFA or where affordable housing is strictly defined, such as the Low-Income Home Energy Assistance Program (LIHEAP), the Illinois Housing Weatherization Assistance Program (IHWAP), the U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers, or Project-Based Rental Assistance (for multifamily), income-eligible multifamily energy efficiency, or tax-subsidized multifamily programs. Households that participate in these programs automatically qualify for ILSFA upon validation by the Program Administrator. The following table shows the currently qualifying third-party programs and the required documentation the Approved Vendor will collect for verification.

**TABLE 6.1. QUALIFYING THIRD-PARTY PROGRAM DOCUMENTATION FOR VERIFICATION**

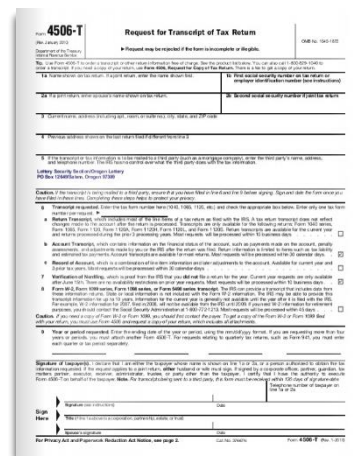
Qualifying Program	Supporting Documentation		Verification Level
Supplemental Nutrition Assistance Program (SNAP)		Award Letter from Illinois Department of Human Services	Household
Low-Income Home Energy Assistance Program (LIHEAP)		LIHEAP Award Letter from household's local Community Action Agency	Household
Illinois Housing Weatherization Assistance Program (IHWAP)		IHWAP Award Letter from household's local Community Action Agency	Household
Medicaid	  	Benefit letter from Illinois Department of Healthcare and Family Services or the Illinois Department of Human Services OR  Medical Card (front and back)	Individual
U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers		HUD Award Letter or current statement	Household
U.S. Department of Housing and Urban Development (HUD) Project-Based Rental Assistance		HUD Award Letter or current statement	Household

<p>Income-Eligible Multifamily Energy Efficiency Programs</p>		<p>Eligibility based on qualified census tracts where 50% or more households are 80% or below AMI</p>	<p>All building tenants</p>
<p>Tax-Subsidized Multifamily Programs</p>		<p>Report, exported data, or screenshot of the National Housing Database subsidies for that building</p>	<p>All building tenants</p>
<p>Illinois Affordable Housing Act</p>		<p>FY 2019 Fair Market Rent Documentation System</p>	<p>Household</p>

Due to the fact that IHWAP sometimes adheres to income eligibility requirements that fall above the 80% AMI used by ILSFA, some households that are of a certain size and in a particular county may need additional follow up to ensure that they are income eligible. Vendors can see in what circumstances additional verification may be needed by referencing [this document](#). [the highlighted incomes in this document.](#)

**METHOD B: TAX TRANSCRIPT VERIFICATION**

A third-party tax transcript vendor has been selected to provide independent income verification of households. This method requires Approved Vendors to first have occupants certify that they are below the required income threshold per the defined percentages of AMI established for each Illinois county and for that household size. [A PDF displaying qualified incomes by Illinois county and household size](#) is made available via the Approved Vendor portal. Once the applicant has certified eligibility, the Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and send or upload to the third-party tax transcript vendor using secure fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable). Upon receipt, the household’s previous year’s income is provided to the Program Administrator. The Approved Vendor must destroy hard copies of completed 4506-T forms within one



week of the determination of applicant eligibility. Approved Vendor employees must be trained on proper handling and protection of these documents to maintain their confidentiality; only trained employees may handle the documents.

#### METHOD C: TAX RETURNS OR PAY STUBS

This method requires Approved Vendors to first have occupants certify that they are below the required income threshold per the defined percentages of AMI established for each Illinois county and for that household size. ~~A PDF chart displaying qualified incomes by Illinois county and household size~~ [A PDF chart displaying qualified incomes by Illinois county and household size](#) is available in the Approved Vendor portal. Electronic copies (which may include scans and/or photographs) of each household member's prior year's income tax forms or pay stubs from the two preceding calendar months must be submitted to the Approved Vendor for verification. Approved Vendor employees must be trained on proper handling and protection of these documents to maintain their confidentiality only trained employees may handle the documents. The Approved Vendor will submit electronic copies to the Program Administrator for validation. The Program Administrator will retain electronic copies of documents. Hard copies and electronic documents will be destroyed within one week of the determination of eligibility where a customer's verification method includes the use of paystubs or tax return, the customer must also submit documentation to verify the household size. Acceptable documentation of household membership may include copies of a driver's license, utility bill, school registration, or, for children under the age of five, birth certificates or medical records. Additional documentation may be accepted on a case-by-case basis. These documents should be treated as sensitive information by the Approved Vendor and destroyed within one week of determination of eligibility by the Program Administrator. Due to the added burden required to obtain household member documentation, the Program Administrator suggests that pay stubs only be used as verification of income eligibility when necessary.

#### METHOD D: U.S. DEPT. OF HOUSING AND URBAN DEVELOPMENT (HUD) QUALIFIED CENSUS TRACTS

LICS sub-program projects allow for an additional household eligibility verification method using HUD Qualified Census Tracts (QCTs). The method for verifying a household's eligibility is done using an online tool created for this purpose by the Program Administrator. ~~This tool will be made available~~ [This tool is available here](#) and via the Approved Vendor portal at [www.IllinoisSFA.com](http://www.IllinoisSFA.com). Approved Vendors will enter the address into the tool and the message ~~"this address qualifies~~ ["This is a HUD Qualified Census Tract"](#) or ~~"this address does~~ ["This is not qualify a HUD Qualified Census Tract"](#) will be displayed. Eligibility is then validated by the Approved Vendor once data is entered into the portal for that household. Note: A Certification and Consent Form (Basic Information Form), the affidavit whereby the applicant certifies that their income is less than 80% AMI, will still be required.

#### INCOME VERIFICATION FOR MULTIPLE ADULT HOUSEHOLDS

In order to verify the income of a household with multiple adults, various methods of verification may be used, ~~with some limitations.~~ Households that qualify at the household or property level do not need to verify individual adult household member's income (e.g., households qualifying for LICS under HUD QCTs, LIHEAP or IHWAP, HUD Project-Based Vouchers or Rental Assistance Vouchers, or Tax-Subsidized Multifamily Programs). Where verification of individual adult household members' income is required

each individual must be listed on the Certification and Consent form and must submit income documentation as outlined in Sections 6.1 and 6.3 below.

### ZERO INCOME VERIFICATION FOR ZERO INCOME OR NO INCOME DOCUMENTATION

~~**Zero Income Household:** Households in which Any and every adult member included on the application is claiming zero income or having no documentation of cash income must complete the submit an Income Affidavit. The Income Affidavit should also be provided by any individual adult within the household who has zero income or no documentation of income.~~

### VERIFICATION PROCESS OVERVIEW

The verification process differs for each sub-program. LIDG and LICS sub-program projects require income certification by applicants, verification by the Approved Vendor, and validation by the Program Administrator. Since HUD QCTs are allowed as eligibility verification for LICS sub-program projects, and that method is least invasive to applicants, it will be prioritized for that sub-program. For projects across all sub-programs, a prescribed order of verification methods is required to ensure that the least invasive method is used first. The sections below detail the processes for all sub-programs.

The contract between the Approved Vendor and the property owner is a separate process, and the verification associated with that contract is different from income verification for the program participants. Property owners are not required to live onsite.

## 6.1. Low-Income Distributed Generation

The process listed below is for LIDG projects for single-family projects or properties with one to four units. See Section 6.1.1 below for the Whole Building Certification process, which may be used for projects on properties with five or more units.

**Step 1:** The Approved Vendor will collect a completed Certification and Consent Form (Basic Information Form), which can be found on the ILSFA website, for all residential units in the building counting toward eligibility (minimum is 50%) and send/upload the forms to the Program Administrator, unless the project is on a building with five or more units that is demonstrating income eligibility through Whole Building Certification (See Section 6.1.1). The Certification and Consent Form (Basic Information Form) will capture key contact and demographic information including legal name of homeowner, complete address, number of people living in household, household income range, and third-party qualifying program (if applicable). This completed form, along with the verification documentation prescribed (including verification of building ownership), will be sent electronically to the Program Administrator via the Approved Vendor portal. Additionally, the owner of a multi-family building or a non-owner-occupied single-family home must sign an agreement that commits to maintaining affordability for the next ~~five~~10 years.

#### Method A

#### Third-Party Qualifying Program Verification

**Step A1:** The applicant will certify that they are currently eligible based on annual household income requirements of 80% or less of AMI using either the current ILSFA [Area Median Income worksheet](#) or the



online ILSFA Area Median Income verification tool and complete the Certification and Consent Form (Basic Information Form).

**Step A2:** The Approved Vendor will determine if the applicant household or property is currently enrolled in any qualified program and has been qualified within the previous 12 months.

**Step A3:** If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and send/upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Tax Transcript Verification.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.).
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

**Step A4:** If Third-Party Qualifying Program documentation is presented, the Approved Vendor will obtain a photo-copy or scanned image and submit it to the Program Administrator electronically. The Program Administrator will review the documentation and an answer of accepted or not accepted will be returned to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will have the opportunity to submit updated or additional documentation or go to Method B: Tax Transcript Verification.

**Method B**

**Tax Transcript Verification**

**Step B1:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and send/upload to the third party vendor, using fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable).

To protect participant information, the Approved Vendor shall not submit copies of the IRS form 4506-T or the tax transcript through the Vendor Portal. After the Approved Vendor submits the IRS form 4506-T through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B2:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B3:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted or if the information cannot be provided by the third-party tax transcript vendor, the Approved Vendor will move to Method C.

#### Method C

#### Tax Return or Paystub Verification

**Step C1:** The Approved Vendor will collect the most recent income tax returns or most recent paystubs capturing the two previous month's earnings for all household members age 18 and over. When using paystubs, documentation for the presence of each household members claimed on the Certification and Consent Form (Basic Information Form) must be included.

**Step C2:** The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.).

- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or paystub was issued

**Step C3:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from notification to resubmit any errant documentation in the Approved Vendor portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. In the case that it is deemed that the applicant household does not qualify for ILSFA, the Approved Vendor may formally appeal to the IPA.

The Approved Vendor on behalf of the applicant will have 2 weeks to appeal the rejection in writing on company letterhead conveyed by email or postal mail. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal.

All tax or pay documentation in the possession of the Approved Vendor will be destroyed after applicant eligibility is determined.

#### **6.1.1. WHOLE BUILDING CERTIFICATION**

Whole Building Certification is the process of determining the eligibility of a building with five or more residential units. Eligibility can be met by one of the following methods:

- Submitting rent rolls showing that at least 50% of the units have rent at or below the HUD Fair Market Rent Prices for the county in which the property is located.
- Showing the property meets the definition of Affordable Housing under the Illinois Affordable Housing Act
- Providing documentation to confirm the property qualifies for one of the following:
  - U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers
  - Project-Based Rental Assistance
  - Income Eligible Multifamily Energy Efficiency
- Letter confirming building is operated by an Illinois public housing authority/agency

The owner/representative of the property must complete the “Low-Income Distributed Generation Certification and Consent (“Certification and Consent”) for Whole Building Certification” Form. This form captures the number of units and key contact information including legal name of property

owner/representative, complete address, and verification method. This completed form, along with the list of current residents (if required) and verification documentation prescribed (including verification of building ownership, if applicable), will be sent electronically to the Program Administrator via the Approved Vendor portal.

## 6.2. Non-Profit/Public Facilities

**Step 1:** The Approved Vendor will collect a completed Non-Profit/Public Facilities Certification and Consent Form (Basic Information Form) and send/upload it to the Program Administrator electronically. The Non-Profit/Public Facilities Certification and Consent Form (Basic Information Form) will capture key organizational and contact information including organization name, complete address, primary contact information, certification of services, and whether the organization is a non-profit or public facility. Additionally, if the non-profit organization is not the owner of the property, contact information for the owner must be provided.

### LOCATION VERIFICATION

The NP/PF sub-program eligibility criteria allows for two paths to qualify the property by location. The property must be in either a qualifying ILSFA EJC or LI community.

**Environmental Justice Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Environmental Justice Community Mapping Tool](#).

If the response is qualified (this would include locations that have been approved via the Environmental Justice Community Self-Designation pathway), the location verification has been completed and the Approved Vendor will move to step B: Organizational Eligibility.

If the response is not qualified, the Approved Vendor will move to location verification Step A2.

**Low-Income Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Low-Income Community Mapping Tool](#).

If the response is qualified, the location verification has been completed and the Approved Vendor will move to step B: Organizational Eligibility.

If the response is not qualified, the entity does not qualify for ILSFA.

## ORGANIZATIONAL ELIGIBILITY

To qualify for the NP/PF sub-program projects must meet organizational eligibility criteria, including 1) satisfying the definition of Critical Service Provider (CSP) and 2) demonstrating the required level of community engagement. For more information, see Section 4.2.<sup>9</sup>

**Step 1:** Verification as a CSP category includes certification of critical services, certification of communities served, and the submission of 1) an IRS determination letter for 501(c)(3) tax status for non-profits or 2) government agency statistical classification for public agencies.

The Approved Vendor will submit the completed form to the Program Administrator electronically. The Program Administrator will review the submission and return a response of accepted or not accepted.

**Step 2:** The Approved Vendor will ensure the Non-Profit/Public Facilities Certification and Consent Form (Basic Information Form) is completed, Documentation of community engagement is required, demonstrating the applicant institution's engagement with the EJC or LI community being served. Documentation must include both:

1. A narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation, and
2. A list of community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation.

Additionally, for a non-profit organization or public entity that does not own its building, the building owner must complete the ILSFA Program Qualified Tenant Agreement. This document confirms that the building owner has granted permission to the Approved Vendor to apply for ILSFA and that the owner will continue to lease the building to the current tenant or a qualifying non-profit/public entity tenant for a total of five years.

For a public facility, the building must host a department/agency that is a Critical Service Provider as defined in Section 4.2 of this manual.

The Approved Vendor will submit the completed form and supporting documentation to the Program Administrator via email, fax, or document upload. The Program Administrator will review the submission and return a response of accepted or not accepted.

If the response is accepted, Verification has been confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from

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<sup>9</sup> Note that starting with Program Year 3 (2020-2021) eligibility is now dependent on satisfying BOTH the definition of Critical Service Provider and demonstrating the required level of community engagement, this is a change from prior program year requirements and is based on the changes in Section 8.6.3 of the Revised Plan.

notification to resubmit any errant documentation in the Approved Vendor portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. In the case that it is deemed that the applicant organization does not qualify for ILSFA, the Approved Vendor may formally appeal to the IPA.

The Approved Vendor on behalf of the applicant will have two weeks to appeal the rejection in writing on company letterhead conveyed by email or postal mail. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal.

## 6.3. Low-Income Community Solar

### PROJECT ELIGIBILITY

As discussed in Section 4.3 above, all LICS projects must provide evidence of community partnerships at the time of Part I project application. Where required, a document upload option will be provided for this element, (i.e., documentation of 100% low-income subscriber ownership, as well as a letter of intent from the intended anchor tenant).

### SUBSCRIBER ELIGIBILITY

Separate from the issue of a proposed LICS project's eligibility for this sub-program, individual low-income households wishing to participate as subscribers to an approved LICS project must satisfy several eligibility criteria, discussed in Section 4.3 above. The procedures for establishing a low-income subscriber's eligibility are as follows:

**Step 1:** The Approved Vendor will collect a completed Household Certification and Consent Form (Basic Information Form) from each household counting toward eligibility (minimum is 50%), unless the project is on a building with five or more units that is demonstrating income eligibility through Whole Building Certification (See Section 6.1.1), and send/upload it to the Program Administrator. This form will include an applicant's certification that they currently qualify based on income eligibility requirements of 80% or less AMI for the household.

#### Method D

#### U.S. Dept. of Housing and Urban Development Qualified Census Tract

**Step D1:** The Approved Vendor will enter the applicant's household address into the ILSFA [HUD QCT online tool](#).

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will move to Method A.

#### Method A

#### Third-Party Qualifying Program Verification

**Step A1:** The Approved Vendor will determine if the applicant household or property is enrolled in any of the qualified programs and has been qualified within the previous 12 months.

**Step A2:** If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and send/upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Tax Transcript Verification.

**Step A2:** If Third-Party Qualifying Program documentation is presented, the Approved Vendor will obtain a copy and submit it to the Program Administrator electronically. The Program Administrator will review the documentation and an answer of accepted or not accepted will be returned to the Approved Vendor within one week.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.).
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will go to Method B: Tax Transcript Verification.

#### Method B

#### Tax Transcript Verification

**Step B1:** The applicant will certify that they qualify based on AMI using either the current ILSFA [Area Median Income worksheet](#) and complete the Household Certification and Consent Form (Basic Information Form).

If the applicant household does meet income eligibility, proceed to Step B2.

If the applicant household does not satisfy income eligibility, they cannot participate in the program.

**Step B2:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-T) for all household members age 18 and over and Send/Upload it to the third-party tax transcript vendor, using fax, email, or custom interface (Note: wet or e-signatures via secure email link are acceptable).

The Approved Vendor shall not submit copies of the IRS form 4506-T or the tax transcript through the Vendor Portal to protect participant information. After the Approved Vendor submits the IRS form 4506-T through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B3:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B4:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted or if the information cannot be provided by Experian, the Approved Vendor will move to Method C.

#### Method C

#### Tax Return or Paystub Verification

**Step C1:** The Approved Vendor will collect the most recent income tax return or most recent paystubs capturing the two previous calendar months' earnings for all household members age 18 and over. When using paystubs, documentation for the presence of each household member claimed on the Certification and Consent Form (Basic Information Form) must be included.

**Step C2:** The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.



- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.),
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or paystub was issued

**Step C3:** The Program Administrator will compare total household income level to 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from notification to resubmit any errant documentation in the Approved Vendor portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. In the case that it is deemed that the applicant organization does not qualify for ILSFA, the Approved Vendor may formally appeal to the IPA.

The Approved Vendor on behalf of the applicant will have two weeks to appeal the rejection in writing on company letterhead conveyed by email or postal mail. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal

All tax or pay documentation in possession of the Approved Vendor will be destroyed after eligibility is determined.

## LOW-INCOME COMMUNITY SOLAR SUBSCRIBERS, SHARES, AND ANNUAL SUBSCRIBER VERIFICATION

LICS sub-program projects require that a minimum of 50% of the total system size (excluding any share subscribed to by an anchor tenant) be allocated to qualified low-income households by one year after the time of energization. The share of LICS RECs paid for at the ILSFA LICS REC price upon energization is determined by the total system share subscribed to by qualified low-income households. An anchor tenant that is a non-low-income residential household, non-profit/public facility or a business would have its subscription share receive payment for RECs at the applicable Adjustable Block Program price. Note, this represents a change from the first two program years, when NP/PF anchors could receive REC payments at the ILSFA LICS price. A one-time payment for the full contract value, determined on this basis, will be made shortly after energization.

One year after energization, Approved Vendors will submit annual reports for each LICS sub-program project (as detailed in the Renewable Energy Credit Management section of this manual). These reports require data reporting for all participants, including changes in share for existing subscribers and new subscribers, along with eligibility verification data for all new subscribers. The quantity of RECs paid for

and thus contractually committed will be adjusted based on subscription shares shown in the first year's annual report (this will be the only adjustment), and a commensurate payment adjustment relative to the prior contractual payment will be made.

Each new participant's eligibility will be validated by the Program Administrator during annual reporting in the same way as during project approval at energization. The requirements that a minimum 50% system share (after excluding the anchor tenant's share, if any) be allocated to qualified low-income households must be met at this time. If the project fails to reach the 50% threshold for a delivery year, collateral will be drawn upon to claw back 100% of the allocated payment for that delivery year (i.e., roughly 1/15 of the total contract price).

## 6.4. Data Management and Validation

Household and Non-Profit/Public Facilities Certification and Consent Forms (Basic Information Forms) contain applicants' certification of eligibility for their respective sub-program. These forms are used by the Approved Vendor as documentation that verifies eligibility and is shared with the Program Administrator for validation. The form is submitted to the Program Administrator via the Approved Vendor portal during data entry for Part I project application, except in the case of the LICS sub-program, where the form is submitted as a part of the Part II application. Data is collected and transferred for each program applicant.

Data is validated per the processes indicated above with individual application validation(s) of eligibility required in order to complete Part I project approval. For LIDG projects where multiple household members must meet eligibility requirements, all applicants must be validated before Part I project approval can be completed. Once eligibility is determined for any applicant, the electronic and hard copy documentation must be destroyed by the Approved Vendor within one week of eligibility being determined. The Program Administrator will retain required information digitally in compliance with state document retention requirements.

# 7. Marketing and Consumer Protection Requirements

## 7.1. Consumer Protections

In addition to technical system requirements, Approved Vendors in ILSFA must work within prescribed guidelines that govern their interaction with the marketplace and potential and actual program participants. LI communities have historically been underserved by programs that offer resources and incentives for energy, housing, and access to capital. These communities have generally had very low participation in the clean energy economy. This has created an information gap and a high level of distrust of the institutions and programs designed to help them. These communities have often been targeted with false or deceptive marketing practices, predatory sales, unfair contracts, and poor-quality workmanship.

These Consumer Protections Guidelines require that the information shared with participants is clear and accurate to ensure a transparent and positive experience for participants. Approved Vendors are required to indicate their adherence to these Consumer Protections Guidelines during registration. All aspects of consumer protections will be monitored by the Program Administrator during project and contract approval and are embedded into project approval processes. Refer to the Consumer Protections Guidelines for the LIDG and LICS sub-programs below.

[Consumer Protections for Low-Income Distributed Generation](#)

[Consumer Protections for Low-Income Community Solar](#)

In addition to the Consumer Protections Guidelines, ILSFA has developed a Program Resources Guide cataloging several federal, state, local, and utility-sponsored sources of assistance for energy efficiency, energy bill payment, and home maintenance:

[Program Resources Guide](#)

## 7.2. Program Informational Brochures

The Program Administrator has developed a standard brochure for each ILSFA sub-program. Approved Vendors are required to present the relevant standard brochure to all customers at the first point of in-person or online contact and again at the execution of their contract (further detailed below). Approved Vendors may access and download these standard brochures at the following links:

- [Low-Income Distributed Generation](#)
- [Low-Income Community Solar](#)
- ~~[Non-Profits and Public Facilities](#)~~
- [Non-Profits and Public Facilities](#)

These standard brochures were developed by the Program Administrator with the IPA and cannot be adapted in any way. All participating Approved Vendors must sign a form acknowledging that they have received these standard brochures and understand that they cannot be changed in any way. However, Approved Vendors can adapt their own marketing materials to include information and language about ILSFA if these changes comply with program guidelines. Additionally, other resources and marketing language provided by the Program Administrator can be adapted. See Section 7.4 for these guidelines.

The standard brochures are presented in a frequently asked questions format to help answer anticipated questions from customers and potential customers. The brochures present information on the following topics:

- What is Illinois Solar for All?
- Who can participate?
- How does the program work?
- What is net metering?
- What are the financing and ownership options when installing solar?
- Savings

- Consumer protections
- Complaint procedure

Approved Vendors may create their own brochure that is targeted to their audience, program, offers, and location, but it must adhere to ILSFA content and branding criteria outlined in Section 7.4, and it must be submitted to and be approved by the Program Administrator three weeks before it is to be distributed. However, the ILSFA standard brochures must be presented to and acknowledged by customers in all cases, regardless of other marketing materials used.

**At first contact:** Approved Vendors must present the relevant standard ILSFA brochure to the customer at the first point of contact, either in person or online. Brochure(s) should be available on any webpage that promotes ILSFA or on any webpages linked on an Approved Vendor's ILSFA marketing materials.

If the first contact between an Approved Vendor and the customer occurs via telephone or direct mail, the standard brochure should be included at the first (if any) follow-up that takes place in person or online.

**At execution of contract:** The relevant standard brochure shall be given to the customer again prior to the execution of any contract, at the point in time at which the contract is executed.

**Delivery:** The standard brochure may be delivered to the customer in person or electronically, but it must be shared as a downloaded file (attachment), not merely hyperlinked in an email or other digital communication.

## 7.3. Program Branding

It is critical that the ILSFA brand remains intact so that the program's message and identity remain consistent. These guidelines have been developed to assist Approved Vendors in properly marketing the ILSFA program.

### ILSFA LOGO

In order to maintain a consistent presence, the use of the ILSFA logo should not violate the specifications listed here. Note that the icon may be used independently from the wordmark in limited applications and with prior Program Administrator approval. The listed space between the icon and wordmark – one quarter the wordmark's height – is the minimum.

## ICON &amp; WORDMARK



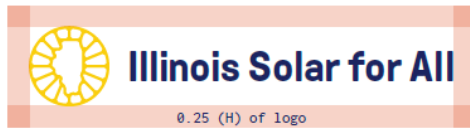
## HORIZONTAL LOCKUP



## STACKED LOCKUP



## MINIMUM CLEARANCE



## MINIMUM SIZE



## ILSFA COLORS

ILSFA's suite of colors is designed along functional lines with a set of primary, secondary, tertiary, and quaternary colors working in concert to highlight possible actions and critical content. Following the values listed here will maximize consistency across different media. Please note that some colors have different CMYK and Pantone values depending on whether the desired paper is coated (C) or uncoated (U). To ensure proper color reproduction, please consult your printer/press's production staff.

PRIMARY



CMYK:  
92,70,0,0  
RGB:  
28,36,96  
1C245E



CMYK:  
61,34,0,0  
RGB:  
80,98,229  
5062E5



CMYK:  
17,10,1,0  
RGB:  
212,217,250  
D4D9FA

SECONDARY



CMYK:  
0,7,93,0  
RGB:  
250,206,12  
FACE0C

TERTIARY



CMYK:  
51,0,46,0  
RGB:  
87,217,132  
57D984

QUATERNARY



CMYK:  
0,69,100,0  
RGB:  
224,78,34  
E04E22

BLACK



CMYK:  
0,0,0,100  
RGB:  
240,16,16  
212126

WHITE



CMYK:  
0,0,0,0  
RGB:  
255,255,255  
FFFFFF

## 7.4. Adapting Marketing Materials

The Program Administrator supplies the suggested language below to assist Approved Vendors in properly marketing the ILSFA program on social media and through email.

### ACCEPTABLE HASHTAGS

- #ILSolarforAll (preferred)
- #ILSFA

### SAMPLE TWEETS

- #ILSolarforAll increases participation in #solar energy projects serving low-income and #environmentaljustice communities. Learn more about how you can get involved: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)

- We're an Approved Vendor of the #ILSolarforAll program! Do you want to learn how you can take advantage of the program? Reach out to us or check out the #ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)
- #ILSolarforAll offers incentives for solar installations for low-income households. Contact us or visit the #ILSFA website to get started: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)

#### SAMPLE FACEBOOK OR LINKEDIN POSTS

- #Solar energy is an efficient, affordable, and clean source of energy that protects the environment and creates jobs. With available incentives through the #ILSolarforAll program, solar can provide significant savings for both low-income property owners and renters. Learn more about how you can get involved: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)
- We're an Approved Vendor of the #ILSolarforAll program! Do you want to learn how you can take advantage of the program? Reach out to us or check out the #ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)
- #ILSolarforAll provides incentives for new solar generation systems serving low-income residents. Program incentives are used to offset costs so that participants have no upfront costs, lower ongoing costs, and additional consumer protections. We're an Approved Vendor through #ILSFA and can help you take advantage of this exciting program: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)
- Interested in offsetting your building's energy use with #solar power and lowering your energy costs? Non-profits and public facilities serving low-income and environmental justice communities in IL may be eligible for #ILSolarforAll. Learn more: [www.IllinoisSFA.com](http://www.IllinoisSFA.com)

#### SAMPLE EMAIL OR NEWSLETTER MESSAGING

##### REQUIRED LANGUAGE FOR EMAIL OR NEWSLETTER CONTENT

All email or newsletter marketing of the ILSFA program must include the program logo, program phone number, program website URL, and the following language:

"The Illinois Solar for All program is administered by Elevate Energy ([Elevate](#)) on behalf of the Illinois Power Agency, an independent state government agency."

##### SAMPLE LANGUAGE

The Illinois Solar for All program (ILSFA) is a low-income solar incentive program made possible by the Future Energy Jobs Act, which was enacted to help strengthen the state's economy and move Illinois towards a clean energy future.

While the cost of solar is declining rapidly, it remains out of reach for many Illinois residents, and installing solar panels is not an option for renters and some property owners. ILSFA will address these barriers by funding onsite and community solar projects that ensure no upfront costs and lead to measurable savings for low-income households and qualified non-profit and public facilities. In doing so, ILSFA will broaden access to the benefits of clean energy, including reduced energy bills, a cleaner environment, and solar energy jobs.

ILSFA sub-programs provide incentives for onsite and community solar for income eligible residential properties, non-profit organizations, and public facilities.

We're excited to contribute to bringing the benefits of solar energy to diverse communities throughout the State of Illinois. Contact us to learn more about how you can get involved or visit the ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com).

## GENERAL PROGRAM TALKING POINTS

- ILSFA provides greater access to the clean energy economy for low-income residents through incentives that help make solar installations more affordable and results in measurable savings for participants.
- ILSFA increases participation in solar energy projects serving low-income and EJCs. Incentives are made available for residential properties, non-profits and public agencies, and community solar projects serving customers with low incomes.
- How the program works:
  - The program evaluates and approves vendors to meet program requirements and help protect consumers. Technical requirements and installation inspections help ensure quality workmanship.
  - Income-eligible homeowners and renters as well as non-profit and public facilities serving low-income or EJCs may be eligible for participation.
  - With ILSFA, residential participants will see no upfront costs, and ongoing costs and fees will not exceed 50% of the value of the energy generated from the PV system.

## LANGUAGE FOR MARKETING MATERIALS AND SALES DISCUSSIONS

Approved Vendors and their agents and subcontractors shall not make any demonstrably false or misleading statements. Approved Vendors and their agents and subcontractors shall accurately portray the nature of solar power and RECs and disclose their intent to sell the project's RECs into ILSFA. Should an Approved Vendor have any questions about whether a statement constitutes accurate portrayal, the Approved Vendor should first submit that statement to the Program Administrator for review and the Program Administrator will endeavor to respond within 5 business days. Below are examples of acceptable and unacceptable statements Approved Vendors may make related to the program.

### WHAT IS THE ILLINOIS SOLAR FOR ALL PROGRAM?

The Illinois Solar for All (ILSFA) program is a state-administered program for photovoltaic (PV) systems that benefit low-income and EJCs in Illinois. The program provides payments in exchange for 15 years of Renewable Energy Credits (RECs) generated by PV systems. ILSFA enables the sale of RECs produced by qualified PV systems to Illinois utilities or to the IPA. Payments vary depending on the project type, size of the system, and where it is located.

Examples of statements companies **may not** make related to ILSFA:

- "We represent the ILSFA program."
- "The ILSFA program pays incentives to low-income households."



- “The ILSFA program gives RECs to participants.”
- “The ILSFA program gives out free solar panels.”

Examples of statements companies **may** make related to ILSFA:

- “ILSFA is a state program that provides an incentive for solar PV systems that serve low-income and EJs.”
- “If you sign a contract with us, and our application to ILSFA is approved, the PV system we install on your roof will be part of the ILSFA program.”
- “If you sign a contract with us, and our application to ILSFA is approved, our community solar PV system will be part of the ILSFA program.”
- “As a subscriber to a community solar project that participates in ILSFA, you will attain net savings on your electric bill, based on your current supply rates.”
- “As a participant in ILSFA, you will attain net savings on your electric bill, based on your current supply rates.”

#### WHAT ARE RECS AND WHY ARE THEY VALUABLE?

Renewable energy credits (RECs) are created when renewable energy generation systems, such as solar panels, generate electricity. However, RECs are not the electricity itself. Instead, RECs represent the environmental attributes of that electricity. RECs can be bought and sold and whoever owns the RECs has the legal right to say they used that clean or renewable energy.

Under Illinois law, utilities are required to supply a certain amount of their energy from renewable sources through the purchase and retirement of RECs. If the RECs from a customer’s PV system are transferred to a utility or the IPA through the ILSFA program, then that customer should not claim to be using clean or renewable electricity. Thus, Approved Vendors and their subcontractors may not suggest that customers participating in ILSFA will receive or use renewable electricity.

Examples of statements companies **may not** make related to RECs and the energy produced by the system:

- “Your home will run on cleaner, greener energy.”
- “The sun will provide your electricity.”

Examples of statements companies **may** make related to RECs and the energy produced by the system:

- “The renewable attributes (RECs) of this electricity will be sold by us to keep the cost of your panels affordable.”
- “Your PV system will help Illinois reach its solar goals.”
- “Your PV system will create energy from the sun.”
- “Your PV system will contribute to the development of solar power.”
- “The renewable attributes (RECs) of this electricity will be sold by us to keep the cost of your subscription affordable.”
- “This community solar project will help Illinois reach its solar goals.”

- “This community solar project will create energy from the sun.”
- “By subscribing to this community solar project, you will contribute to the development of new solar power.”

#### WHAT IS THE RELATIONSHIP BETWEEN THE ADJUSTABLE BLOCK PROGRAM (ABP) AND THE ILLINOIS SOLAR FOR ALL PROGRAM?

The Illinois Adjustable Block Program (ABP), like ILSFA, is an incentive program that supports the development of new solar photovoltaic (PV) systems in Illinois through the purchase of renewable energy credits (RECs). While the ABP enables the sale of RECs produced by PV systems to Illinois utilities, ILSFA enables the sale of RECs produced by PV systems to both utilities and the Illinois Power Agency (IPA), depending on the source of funding.

The ABP will facilitate purchase of RECs from qualified projects serving any household, business, or other entity ILSFA specifically serves low-income households.

The incentives (value of the RECs purchased) for ILSFA are measurably higher than for the ABP which allows incentives to be passed on to eligible participants and help cover the additional costs associated with marketing, building, and maintaining PV systems in these communities.

#### FINANCIAL BENEFITS

ILSFA requires that all eligible residential participants see no upfront costs. ILSFA requires that all ongoing costs and fees to participants do not exceed 50% of the value of the energy generated for their share of the system. This savings requirement is measured in the first year, as well as over the term of the contract for that participant. For example:

- If a LIDG participant receives \$1,000 of net metering credits on their electricity bill in the first year, their total costs and fees must not exceed \$500 for that year. Similarly, over a 15-year contract, if the system’s energy value is \$15,000, the participant’s savings must be at least \$7,500 over that period.
- If a property owner or manager of an eligible multifamily building that installs a LIDG project receives \$1,000 worth of net metering credits on the building’s electricity bill, they must pass on no less than \$500 in additional services to tenants indirectly (through lowered rents, stabilized rents, or other services or improvements).

Examples of statements that companies **may not** make related to whether or how customers will save money:

- “If you participate in ILSFA, you will save 50% on your energy bills.”
- “ILSFA guarantees savings on your energy bills.”
- “ILSFA guarantees 50% savings for all participants.”
- “If you subscribe to an ILSFA community solar project, you will save 50% on your energy bills.”
- “ILSFA guarantees 50% savings for all community solar subscribers.”

Examples of statements companies **may** make related to whether or how customers will save money:

- “The ILSFA program requires that all participants see value from the energy the solar PV system generates.”
- “ILSFA participants see value from their solar PV system in different ways, depending on the program, property type, or system size.”
- “The ILSFA program ensures that your fees won’t be more than half of the value you receive through electricity bill credits.”
- “The ILSFA program requires that all subscribers see value from the energy the solar PV system generates.”
- “ILSFA community solar subscribers see value from their solar PV system in different ways, depending on the rate you pay for your electricity supply, and your share of the community solar system.”
- “The ILSFA program ensures that your fees won’t be more than half of the value you receive through the electricity bill credits.”

## ENVIRONMENTAL JUSTICE COMMUNITY DESIGNATION

ILSFA sets a goal of allocating no less than 25% of incentives to projects located in EJC across the state. EJC are designated using the mapping tool found [here](#).

This designation is used solely for establishing a mechanism for achieving this goal. The designation of particular locations as EJC does not have any specific or implicit purpose outside of this ILSFA allocation goal.

Households that reside within a designated EJC not automatically eligible to participate in ILSFA because of this designation. Households must still qualify based on income. However, one of the eligibility requirements for non-profits and public facilities is being located in an EJC or LI community.

Approved Vendors or their agents and subcontractors will not state that customers will qualify for ILSFA based on residing in an EJC nor that customers will qualify for an ILSFA community solar project solely because they live in a HUD Qualified Census Tract.

Visit the Environmental Justice section of the ILSFA website for more information:

<https://www.illinoisfa.com/environmental-justice-communities/>

## ACCURATE PORTRAYAL OF IDENTITY AND AFFILIATION

Marketing materials shall not refer to the ICC, the IPA, the Program Administrator, or the State of Illinois, in any manner that is deceptive or misleading, including, but not limited to, implying or otherwise leading a customer to believe that an Approved Vendor is soliciting on behalf of, or is an agent of, the ICC, the IPA or the Program Administrator. An Approved Vendor may state that fact that it is an Approved Vendor under the IPA’s ILSFA program.

## USE OF UTILITY NAME AND LOGO

An Approved Vendor or its agent shall not use the name or logo of a public utility in any manner that is deceptive or misleading, including, but not limited to, implying or otherwise leading a customer to believe that an Approved Vendor is soliciting on behalf of a utility.

An Approved Vendor or its agent shall not use the name, or any other identifying insignia, graphics, or wording that has been used at any time to represent a public utility company, the ICC, the IPA, or the Program Administrator, or their services, to identify, label, or define any of its offers. This does not, however, restrict use of a utility name in describing where an offer is valid.

Approved Vendors may use testimonials to advertise customer experience. All testimonials must be provided by actual customers. All testimonials must include a disclaimer that user experience may differ. The IPA may request documentation to validate the accuracy of testimonials including verification of the identity of the testifier. Testimonials cannot include language that make false claims. Testimonials cannot violate any of the above restrictions (for example, using a utility executive or government official to endorse an Approved Vendor).

The IPA and the ILSFA Program Administrator will address any requests for exceptions on a case-by-case basis.

## PROGRAM ADMINISTRATOR REVIEW PROCESS

While all marketing activities must utilize the existing templates and messaging, the ILSFA Program Administrator recognizes that Approved Vendors may have a need to adapt these materials for their specific customer or location. This section provides information on how to submit these marketing materials for review and approval by the Program Administrator.

Approved Vendors will be asked to agree to the terms of the ILSFA marketing guidelines. This includes providing samples of marketing materials or content used by the Approved Vendor or by its subcontractors, installers, affiliates, or Designees, to the Program Administrator for review. The Approved Vendor must provide copies of any marketing materials related to the sale, financing, or installation of solar PV systems that apply to participate in ILSFA.

All marketing materials created by the Approved Vendor must be consistent with the approved ILSFA brand guidelines and must be submitted to the Program Administrator for review and approval three weeks prior to distribution. The Approved Vendor must agree to make changes to marketing materials as requested by the IPA or the Program Administrator in an effort to ensure that these materials are not deceptive, confusing, or misleading, and to further ensure that the materials do not feature misrepresentations of the Approved Vendor's relationship to the IPA or the ILSFA program. Failure to do so will result in violation of consumer protections, as outlined below.

All marketing and promotional materials, printed or digital, produced by an Approved Vendor must be submitted for review. Materials should be submitted to the Program Administrator three weeks prior to the intended distribution date, and the Program Administrator will provide feedback within one week of receiving the materials.

Please note that the review may be subject to recommended modifications to the materials, which may affect an Approved Vendor's planned distribution date.

Materials for review may be submitted via email. Send design files (marketing materials) or mockup proofs (promotional items) to [info@illinoissfa.com](mailto:info@illinoissfa.com).

Once submitted, confirmation/comments/responses will be emailed to the submitter. The Program Administrator has the right to modify and/or edit original text/images/layout in compliance with the ILSFA program brand guidelines.

#### VIOLATION OF MARKETING AND CONSUMER PROTECTIONS GUIDELINES

In the event that the Program Administrator identifies that it believes an Approved Vendor is not or has not complied with program requirements, the Program Administrator will notify the Approved Vendor through an email that outlines the problematic behavior, explains how the behavior is non-compliant with program requirements, and may request more information about the issue.

With the limited exception of emergency situations requiring immediate action (as determined at the discretion of the IPA), no disciplinary determination (such as the suspension or revocation of the ability to participate as or on behalf of an Approved Vendor) will be made by the Program Administrator without the allegedly offending party having the opportunity to offer a written or oral explanation of the problematic behavior for review and analysis by the Program Administrator.

After a review of any such response, the Program Administrator will determine what discipline, if any, should apply to the Approved Vendor. All disciplinary determinations made by the Program Administrator will be communicated through a written explanation of the determination featuring at least the following:

- A brief explanation of the infractions for which the entity is being disciplined.
- A timeline of communications between the offending entity and the Program Administrator.
- Specific reference to which specific Program requirement(s)/guideline(s) the offending entity violated.
- An explanation of any disciplinary action, including what specific conduct is no longer permitted in connection with the Program through the length of the suspension.
- An explanation regarding how the Approved Vendor may appeal the disciplinary determination to the IPA and the deadline for submission applicable to any appeal.

To appeal a disciplinary determination to the IPA, an Approved Vendor should provide to the IPA a request for reconsideration of discipline in writing on company letterhead explaining its rationale for why it believes the Program Administrator's determination is in error as well as sharing any supporting information, documents, or communications. The IPA may request additional information and materials from the Approved Vendor and/or seek to schedule a call or informal discussion with the Approved Vendor to learn more about the basis for the Approved Vendor's position. The IPA and Program Administrator will endeavor to issue final determinations, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information.

The Program Administrator will review and make approval decisions for all Approved Vendor requests for reconsideration. It is the responsibility of the Approved Vendor to respond to any questions or requests for additional information from the Program Administrator within two weeks of receiving such a request. Failure to respond to requests from the Program Administrator will constitute grounds for rejection as an Approved Vendor. Any Approved Vendor requests for reconsideration that are rejected will be provided a written explanation with the reasons for the rejection.

The Program Administrator will provide a copy of the determination to the IPA. The Approved Vendor may appeal the disciplinary action in writing by providing the IPA a request for reconsideration on company letterhead that includes an explanation of why the Approved Vendor believes the determination was made in error. The Approved Vendor should include supporting information, documents, or communications that support its rationale. The IPA may request additional information and materials from the Approved Vendor, and/or seek to schedule a call or informal discussion with the Approved Vendor to learn more about the basis for the Approved Vendor's position and the Program Administrator's determination. The Approved Vendor will have two weeks to appeal the rejection in writing on company letterhead conveyed by email or postal mail. The IPA is the final authority for granting or rejecting an appeal.

If you have additional questions on topics that are not addressed here, Approved Vendors should first reach out to the Program Administrator. The Program Administrator will review any requests for exceptions on a case by case basis.

Please note: The IPA and the Program Administrator reserve the right to produce standardized marketing materials and to require vendors to use those materials to supplement whatever other materials they may use.

## 7.5. Contract Requirements

Approved Vendors and their agents (including installers and marketers) must incorporate a specified set of minimum contract requirements into their installation contracts (for LIDG or NP/PF projects) or subscription contracts (for LICS projects). Approved Vendors will be required to attest that these contract requirements were satisfied at the time of submitting either a Part I application (for LIDG or NP/PF projects) or a Part II application (for LICS projects). The IPA and Program Administrator reserve the right to request copies of these contracts.

- [Distributed Generation \(Installation\) Contract Requirements](#)
- [Community Solar \(Subscription\) Contract Requirements](#)

# 8. Project Submission Processes

## 8.1. Project Submission Process Overview

~~Note that this project submission process for the 2020-2021 Program Year has been updated based on the Revised Plan. Subsequent program years may follow different processes or timeframes as~~

~~determined by market uptake for each sub-program. Prior~~Note that prior to the launch of each project annual submission window, a detailed schedule will be released by the Program Administrator according to the following guidelines.

## PROJECT SUBMISSION WINDOW

Part I project submission begins with a pre-determined project submission time window for each sub-program. The timeline for this window will be announced by the Program Administrator. The initial project submission window timelines for the ~~2020-2021-2022~~ Program Year are available [here](#). The batch process has been updated in the Revised Plan and is further detailed below. A single project can only be submitted into one sub-program during a given program year. Completed disclosures, system design information, as well as income verification details for LIDG must be completed and submitted during this window. Any deficiencies will be communicated to the Approved Vendor during this window and must be remedied within the designated cure period.

## CURE PERIOD

After project review by the Program Administrator, a 30-day cure period will begin for all sub-programs to allow Approved Vendors the opportunity to correct deficiencies, including missing, unclear, or incomplete project information. Although the cure period is intended to address these issues, note that all submissions should be checked for accuracy and the Program Administrator may reject a submission or discipline any Approved Vendor suspected of purposefully submitting placeholder or blank documents.

Any deficiencies must be sufficiently addressed prior to the close of this cure period in order for those projects to be considered for Part I project approval and project selection. At the Program Administrator's discretion, the cure period may be extended up to two weeks from the last good-faith effort to provide the required information. Projects that do not satisfy requirements during this cure period may resubmit during subsequent submission windows.

## PROJECT AND BATCH APPROVAL

The Program Administrator will review all project information submitted according to the requirements and processes outlined below. When batching is required, only batches that have an aggregate capacity of approved projects representing at least 75% of the submitted batch capacity will be deemed eligible to move forward to project selection and final contract approval.

## PROJECT SELECTION

The project selection process is triggered when any sub-program has a total capacity of eligible, submitted projects from the initial application time window that are greater than 100% of a given sub-program's annual budget. The project selection process is detailed in Section 9 of this manual. Projects selected in this process will have funds allocated and move on to project development if applicable and Part II project submission, regardless of final batch size. A Part I project application may be withdrawn prior to the day of the final project selection.

If the project selection process is not triggered for a sub-program as discussed more in Section 9 below, then a Part I application may be withdrawn up until the batch is sent to the ICC for approval.

## ADJUSTABLE BLOCK PROGRAM AND ILLINOIS SOLAR FOR ALL

While proposed projects may be submitted to both the Adjustable Block Program (ABP) and ILSFA for approval and funding, contracts will be awarded from only one program or the other. And because the potential exists that a single proposed project can be found eligible or approved by both programs concurrently, a milestone must be identified that indicates acceptance of contracting from one program and ineligibility from the other.

Therefore, ILSFA will find any proposed project that has been approved by the ABP Program Administrator and the resulting REC contract sent to the ICC for approval no longer eligible for ILSFA. Projects submitted to the ABP must be withdrawn prior to this milestone to remain eligible for ILSFA.

## APPROVED VENDOR CONTROL OF PROJECTS

A project that has been waitlisted (see Section 9) or otherwise not yet selected for a REC contract may change Approved Vendors after its Part I application is submitted; the new Approved Vendor must submit documentation showing that the original Approved Vendor, the project host, and the project owner have consented to have the new Approved Vendor control the ILSFA application and the project's RECs.<sup>10</sup> As a further clarification, an Approved Vendor itself may be sold, or the equity ownership of a project may be sold, without the Program Administrator's approval, but the vendor or project details should be updated within the online portal.

## SWITCHING A PART I APPLICATION'S APPROVED VENDOR

A project that has been waitlisted or otherwise not yet selected for a REC contract may change its Approved Vendor ("AV"). To be clear, this switch of Approved Vendor could be for an individual project that is a subset of a larger batch (although minimum batch size requirements would still apply).

While it is not necessary to seek Program Administrator approval in advance of commencing this transaction, the Approved Vendor transferring the project and the Approved Vendor receiving the project ("Transferee") must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ILSFA application. The documentation also must show that the project host and the project owner, if different, consent to the change of Approved Vendor.

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendor. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being received by the Transferee AV. The co-located pricing provision will only be applicable if the ICC's approval of the second project is within one year or less of the ICC's approval of the first project. If the first project has

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<sup>10</sup> If a community solar project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors.



not yet received ICC approval at the time of the second project's approval, then the co-located pricing provision will apply.

## 8.2. Disclosures

Approved Vendors must complete and provide standard disclosure forms to each program participant, and obtain the participant's signature, prior to contract execution with the participant. The ILSFA LIDG Standard Disclosure Forms are offered in system purchase, system lease, and power purchase agreement variations and include a financial summary of system value and costs, contract terms, system equipment and components, warranty information, and high-level information on basic solar concepts. The forms include an estimate of the price and performance of the system as installed, including projected savings for the first year and the term of the contract. Savings for both periods are automatically calculated and must meet the minimum savings requirements outlined in Section 5 of this manual.

- ~~Low Income Distributed Generation Disclosure – System Purchase~~
- ~~Low Income Distributed Generation Disclosure – System Lease~~
- ~~Low Income Distributed Generation Disclosure – PPA~~
- ~~Non-Profit/Public Facilities Disclosure~~
- ~~Sample Low-Income Community Solar Subscription Disclosure~~
- Low-Income Distributed Generation Disclosure – System Purchase
- Low-Income Distributed Generation Disclosure – System Lease
- Low-Income Distributed Generation Disclosure – PPA
- Non-Profit/Public Facilities Disclosure
- Sample Low-Income Community Solar Subscription Disclosure

For LIDG and NP/PF projects, a completed disclosure form is required for submission of a Part I application. ~~The~~For LIDG projects, the disclosure form must be generated using the disclosure form system within the Approved Vendor portal at [www.IllinoisSFA.com](http://www.IllinoisSFA.com) ~~unless otherwise approved the Program Administrator.~~ The portal contains an interactive form that can be completed by either the Approved Vendor or one of their approved Designees and can either be e-signed by the participant using the portal e-signature functionality or printed, signed, scanned, and uploaded. While the Approved Vendor or their subcontractors can facilitate the disclosure submission process, the forms can only be signed by the participant. The information from the disclosure form is automatically transferred to the application portal to start a Part I application for DG systems. All data required to complete disclosure forms must be manually entered into the portal by the Approved Vendor whether the automated disclosure tool or printed form is used. ~~Approved Vendors are not authorized to use their own versions of disclosures or their own e-signature systems.~~The information on a disclosure form can be updated within the Portal prior to customer signing but cannot be edited after the customer has signed the document (for e-signing) or downloaded the document (for wet signatures), thus finalizing the form. Approved Vendors are not authorized to use their own versions of disclosures (except with prior approval from the Program Administrator as described below) nor are they authorized to edit in any way the disclosure form generated in the Portal. Approved Vendors may employ commercially available e-signature systems for

customer signature of the disclosure form but must submit the audit/signature information page with the e-signed disclosure form. Note that if the AC size of a system as submitted in Part I differs by more than 5% or 1 kW, whichever is greater, from the AC system size noted in that application's disclosure form, a new disclosure form will be required.

An Approved Vendor may request the use of an internally generated disclosure system for LICS projects as long as they demonstrate their system to the Program Administrator, showing calculations and output that match the portal-generated disclosure. Bulk uploads of both signed disclosures generated through the Approved Vendor's system, along with signature audit documents and portal-generated disclosures are required to be submitted in the portal as an upload to the project. Use of disclosures created within an Approved Vendor's system will be limited to subscriptions using a standard offer as described at the time of approval of the internally generated disclosure.

The disclosure form is to be completed after system design and must be delivered to the customer before the contract is signed. LIDG disclosures must be delivered to the customer at least seven calendar days prior to the execution of the contract. A representative of the Approved Vendor shall review the disclosure form with the customer before the customer signs it and provide the customer with an opportunity to ask questions about the disclosure form. prior to obtaining a signature from the customer. The customer must sign the disclosure form prior to signing the installation agreement. Terms of the underlying contract between a customer and an Approved Vendor or its subcontractor must be consistent with terms of the required disclosure form. Any statements made verbally must be consistent with the contract and the disclosure form.

An Approved Vendor of a contracted LICS project will be required to identify all known subscribers (and their subscription shares) and submit the subscribers' executed subscription disclosure forms, following the requirements outlined above, with the Part II application at the time of energization. For any subscription agreement that was executed prior to the publication of the Low-Income Community Solar Subscription Standard Disclosure Form, the Approved Vendor will have an opportunity at the Part II application to attest, in lieu of submitting a subscriber's executed disclosure, that diligent, good-faith efforts to obtain the signed disclosure were unsuccessful.

### 8.3. Batches

Applications will be completed on a project-by-project basis. Approved Vendors who have not yet had a contract approved by the ICC are required to submit projects in batches of at least 50kW of projects, and 75% of the capacity of that batch must be verified to be approved. However, for established Approved Vendors who have already had a contract approved by the ICC, projects may be submitted either during the initial submission window or on a rolling basis if project selection is not required and the sub-program is reopened for submissions. As projects are verified, the Program Administrator will place them into new batches that will result in a contract and/or new confirmations with one utility or the IPA. Utilities (or the IPA) may use one master agreement with multiple confirmations (one confirmation per batch) from an Approved Vendor, rather than having multiple contracts with the same vendor. The systems within the batch/confirmation will be listed on a schedule (or product order) attached to the contract and may not be substituted once approved.

In cases where an initial batch of 50kW must be established, a batch may include any combination of project types and locations within a given sub-program. Project applications will only be reviewed once they have been submitted as part of a batch. The Approved Vendor Managers on the administration team are available to answer questions and should be viewed as a resource for vendors throughout the project application process.

The Program Administrator will review each project's application for compliance with program guidelines and, as needed, request additional information from the Approved Vendor to verify the submitted information and approve the project. A pre-determined cure period to remedy deficiencies will begin after the project submission window has ended. If a submitted project does not meet program requirements once the cure period ends, that project will not be eligible for a batch if one is required. Batches will be approved if at least 75% of the initially submitted capacity of the batch is approved by the Program Administrator. If, after project selection, there are eligible projects from the batch that are not selected, batches that have less than 75% of the submitted batch size will still be approved.

If, after any attempts to cure deficiencies have been made, at least 75% or more of the kW volume in a batch is reviewed and deemed eligible by the Program Administrator for those Approved Vendors that require an initial 50kW batch, the Program Administrator will forward the batch or individual projects, as applicable, to the Adjustable Block Program Administrator, who will generate the REC for all ILSFA projects. The batch and/or individual projects will be assigned to a REC contract with either a utility or the IPA (depending on the source of funds).

An Approved Vendor that has not yet had an ICC-approved ILSFA project may submit a batch meeting the minimum batch size requirement of 50 kW but, due to one or more of the submitted projects being withdrawn, the batch fails to meet the requirement of having 75% of the batch's capacity verified as approved. In such a case, the Program Administrator may move forward with review of the remaining projects in the batch.

See Section 11 of this manual for more details on the REC contracting process.

## 8.4. Part I Project Approval

Applications consist of a Part I and a Part II, and each of these parts must be completed for each participating system. The Part I application is completed in the project planning stage and collects information on a system's planned technical aspects, including size, estimated REC production, equipment, and installation company information. The Part II application is to be completed only when a project has been installed and energized.

For Part I submission, the Program Administrator reviews each application to ensure that it meets all the requirements of the applicable sub-program. Based on this review the Program Administrator deems the project either eligible or ineligible. This verification may include review of:

For all sub-programs:

- Approved Vendor's registration status in the Adjustable Block Program
- System design specifications

- Project location<sup>11</sup> and property owner
- Name of utility for which the system is interconnected
- Project type
  - Low-Income Distributed Generation (1-4 units)
  - Low-Income Distributed Generation (5+ units)
  - Low-Income Community Solar
  - Non-Profits/Public Facilities
- Technical project information
  - Array information (number of modules, module power rating, tilt, and azimuth) for each array
  - Ground-, roof-mounted or carport (for each array)
  - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking) for each array
  - Inverter information (number of inverters, aggregate inverter size(s) in kW steady-state AC output, which must be equal to or less than nameplate capacity)
  - Inverter efficiency (including transformer loss for designs including transformers on customer side of meter)
  - System size in DC and AC will be calculated by the portal from the information provided above
  - Estimate of first-year energy production
  - Capacity Factor Choice (and Capacity Factor Value, if using Alternate Capacity Factor)
  - Document uploads and filename structure for naming documents:
    - System design consisting of the following elements:
      - Site Plan (Property lines, array and equipment locations, equipment, obstructions, point of interconnection)
      - One Line Diagram
      - Shading Analysis (Helioscope, Aurora, PVsys, etc. Model must show system arrays, obstructions and include first year kWh production.)

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<sup>11</sup> The project's latitude and longitude (in degrees out to 6 decimal places, e.g. 41.881856, -87.631222; this information is easily identified through Google Maps) will be requested as *optional* information. Projects in rural locations are strongly encouraged to provide this information. Approved Vendors that submit a significant number of projects with addresses that are difficult to map but no latitude/longitude information may be asked by the Program Administrator to provide latitude/longitude for all future project applications.

<sup>12</sup> System Design encompasses the site plan, one -line drawing diagram, and shading analysis and cut sheet showing UL listing for mounting system. This document should include all threefour elements, with each page titled to reflect its content. It should be collated and reviewed by appropriately qualified personnel who check for consistency and accuracy before it is submitted to ILSFA.

- UL listing for mounting system equipment: roof mount, pole mount, bracket, tracking system, etc. (Cut-Sheet or other method of showing UL certification)
  - ▶ Filename structure: [Project #]\_Site\_Plan\_System\_Design\_YYYY\_MM\_DD  
e.g. 0001\_Site\_Plan\_2019\_06\_13
  - ▶ Structural Plan (racking system detail, mounting/anchoring information)
  - ▶ Filename structure: [Project #]\_Structural\_Plan\_YYYY\_MM\_DD e.g. 0001\_Structural\_Plan\_2019\_06\_13
  - ▶ One-Line Drawing
    - Filename structure: [Project #]\_One\_Line\_YYYY\_MM\_DD e.g. 0001\_One\_Line\_System\_Design\_2019\_06\_13
    - Shading Analysis (Helioscope, Aurora, PVSys, etc.)
    - Filename structure: [Project #]\_Shading\_YYYY\_MM\_DD e.g. 0001\_Shading\_2019\_06\_13
    - UL listing for equipment: Modules, Inverters, Racking system (Cut Sheet or other method of showing UL certification)
    - Filename structure: [Project #]\_Equipment\_YYYY\_MM\_DD e.g. 0001\_Equipment\_2019\_06\_13
- Customer Data
  - Document Upload: Customer Contract (DG and NP/PF only)
  - Customer contract term start/end date
  - Income verification for all income-eligible participants (unless customer already received an Income Verification Approval Letter from the Program Administrator), using the directions as follows:
    - For all Methods, use the following file structure to submit Certification and Consent forms: Filename structure: [Project #]\_Cert and Cons
    - If using Method A or Method C for income verification:
      - Use the following file structure to submit the required documentation:  
Project#\_Type of Document\_Last Name
      - Remember to redact all personally identifiable information (PII). PII may include the following: ID numbers, such as driver's license numbers, state ID numbers, and passport numbers, date of birth, social security numbers, supplemental security income number, taxpayer identification number, patient identification number and financial account numbers such as bank accounts. Names and addresses, and partial date of birth (MM/YYYY) will be needed to be used for verification purposes. Refer to Section 6.1 and/or Section 6.3 for more details about redacting PII.
    - If using Method B: Do not upload the participant's 4506-T. The Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

- If income verification was completed by the Program Administrator:
  - Use the following file structure to submit the Income Verification Approval letter: [Project #] IVLetter\_LastName
- For LIDG
  - Income verification (following directions provided above)
    - (If generated through portal:) Customer’s e-signed disclosure form (or attestation that the project went under contract or was installed prior to May 10, 2019 and good-faith, diligent efforts to obtain a signed disclosure after that date were unsuccessful)<sup>13</sup>
    - Proof of site ownership
    - Host acknowledgement or another site control document
    - Affordability Agreement, if applicable
- For Non-Profits/Public Facilities
  - Project site location in low-income or EJC
  - (If Generated through portal:) Customer’s e-signed disclosure form (or attestation that the project went under contract or was installed prior to May 10, 2019 and good-faith, diligent efforts to obtain a signed disclosure after that date were unsuccessful)
  - Documentation establishing organization type as non-profit or public agency
  - Proof of site ownership
  - Host acknowledgement or another site control document
  - Qualifying Tenant Agreement, if applicable
  - Documentation that the organization is a CSP (submitted-with the Part I application) and demonstrated community engagement per program requirements
- For Community Solar only
  - Planned Anchor share
  - Planned Anchor type (non-profit, public facility, other)
  - Document Upload: Letter of Intent from Anchor Tenant
  - Planned share of low-income household subscribers
  - Planned non-qualifying share
  - Planned small subscriber share (applies only to low-income household share)
  - 100% subscriber-owned status, description, and supporting documentation
  - Proof of site control
  - Document Upload: Community Partnership Description
- Other required uploads
  - Signed disclosures (wet signatures) if not completed through the application portal

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<sup>13</sup> For disclosures that are completed using a fillable PDF document, see “Other Required Uploads” for additional requirements.

- Savings Calculator for the relevant sub-program if submitting a disclosure that was not generated through the portal
- Plot diagram or site map for all systems
- Photo documentation, as detailed in Section 14.3
- Signed contracts with MWBE subcontractors for any project intending to request MWBE points as a part of Project Selection.
- For projects larger than 25 kW
  - Interconnection agreement signed by both the interconnecting utility and the interconnecting customer. (Exceptions will be made for projects that were forced from the utility interconnection queue due to the utility's queue management process. These projects need only demonstrate that they exited the interconnection queue involuntarily and have subsequently reapplied for interconnection.)
  - Proof of satisfying non-ministerial permit requirements
- Requirements for systems already energized prior to [Solar for All](#) application
  - GATS or M-RETS unit ID
  - Document Upload:
    - Ameren Customers: Permission to Operate Packet (PTO) comprised of two approval emails from Ameren Illinois indicating approval to energize and operate
    - ComEd Customers: signed Certificate of Completion of Interconnection including project information
    - Other utilities and coops: signed Certificate of Completion (CoC) and supporting documentation as needed to tie to DG facility
  - Document Upload: Net Metering Application Approval Letter (if applicable)
- For LIDG and NP/PF projects:
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the installation contract with the customer is consistent with the disclosure form provided to the customer
  - Attestation of compliance with all DG installation contract requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for DG contracts executed before May 10, 2019 were unsuccessful)

Project applications are submitted via the online vendor portal, including data entry and document uploads. Project-level review commences when a batch is submitted. Projects that meet all program Part I requirements will be deemed eligible, which does not guarantee funding but will allow that project to move forward through the Project Selection Protocol.

## PROJECT SELECTION AND ICC APPROVAL

If the sub-program budget is less than 100% subscribed at the end of the initial project submission window, all eligible projects in that sub-program will be sent to the ICC with a recommendation for approval. If the sub-program is more than 100% subscribed, the [Project Selection Protocol](#) will be triggered, and all eligible projects in that sub-program will be included in the project selection process. Selected projects will then be sent to the ICC with a recommendation for approval. Generally, the ICC meets [twice per month](#).

Projects approved by the ICC will be contracted with a utility or the IPA. After construction is complete, projects move to Part II submission and approval. Projects already installed at Part I approval can move immediately to Part II submission.

### 8.5. Part II Project Approval

Once a system is completed and energized (and after ICC approval of the system's application for a REC contract), the Approved Vendor will complete Part II of the application. Part II will consist of uploading information verifying completion of the project and confirming that the specifications have not changed from the Part I application. In addition, the Approved Vendor will provide documentation certifying the system has received ~~a certificate of completion from the Authority Having Jurisdiction and~~ final interconnection approval from the local electric utility.

For Part II submission, the Program Administrator reviews each application to ensure that it meets all the requirements of the applicable sub-program. This verification may include review of:

For all sub-programs:

- Final technical project information
  - Actual system size in both DC and AC (if different than the size submitted in Part I, please re- supply the array information)
  - Final (projected) first-year energy production
  - Modules: manufacturer/make, model
  - Inverter: size, manufacturer/make, model,
  - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking) – must be the same as submitted in Part I
  - Does this project have a battery backup?
  - Meter: manufacturer/make, model (does the meter meet the ANSI C.12 standard if required by the applicable registry?)
  - Provide description of any other changes made to the project between initial application and the completion of the project
  - Interconnection approval date and online date
  - PDF output of final system design (Helioscope, Aurora, etc.)
  - PDF output of final shading analysis
- System registry information



- GATS or M-RETS unit ID
- Registry in which the system is registered (PJM-GATS or M-RETS)
- Provide the PJM-GATS or M-RETS unit ID
- Provide the name on the PJM-GATS and M-RETS account
- Provide proof of accepted irrevocable transfer agreement
- For Low-Income Community Solar projects only:
  - Anchor tenant at energization, including subscription sizes and anchor type (non-profit, public facility, other)
  - Low-income household subscribers at energization, including subscription sizes
  - Non-qualifying subscribers at energization, including subscription sizes
  - Small subscriber share at energization (applies only to low-income household subscribers)
  - (Generated through portal:) For all identified subscribers, a signed disclosure form (or attestation that the project went under subscription contract prior to the date the standard disclosure form was published, and that good-faith, diligent efforts to obtain a signed disclosure after that date were unsuccessful)
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the subscription contract with each identified subscriber is consistent with the disclosure form provided to the customer
  - Attestation of compliance with all community solar subscription requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for subscription contracts executed before May 13, 2019 were unsuccessful)
  - Screenshot of community solar subscribers from utility CS portal
- Financing structure (customer-owned, lease, or PPA) (not asked for community solar)
- Document Upload: ~~Certificate of Completion signed by the utility~~
  - Document Upload: For Ameren interconnections: Permission To Operate (PTO) packet which includes an approval to operate notification email from Ameren Illinois with the signed Certificate of Completion, Installer Certification and Net Metering Application attached, and a second email that includes completed Acceptance and Final Approval Letter (if applicable) and Level 1 DG Interconnection Application or Level 2-4 Interconnection Application.
  - For ComEd interconnections: signed Certificate of Completion which includes project information (location, type, kW capacity, status, etc.)
  - For other utilities and co-ops: signed Certificate of Completion and supporting documentation (e.g., interconnection application) that ties the Certificate of Completion to the DG facility.

- Installer information (must match the name of a current ICC Certified DG Installer) and their ICC verified “Qualified Person”)
- Job train employment and demographic data (hours, work categories, and qualified program details for all qualified trainees as well as estimated total employee work hours by work category)
- Final system cost including any and all costs related to the following: modules, inverters, other generating equipment, balance of system (BOS), engineering/procurement/construction (EPC), installation, interconnection, origination and development, sales/general/administrative (SG&A) including customer acquisition, financing, legal, permitting/inspection/other soft costs, contingencies, and any other direct or indirect costs attributable to the project. Any and all profit that results from project development should not be included in the total project cost. Note that with respect to information submitted by Approved Vendors into ILSFA, the IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in ILSFA. This includes the assertion of FOIA exemptions for commercially sensitive information or for personally identifying information when applicable in response to a FOIA request and to otherwise protect the confidentiality of commercially sensitive information in response to any discovery request or other request made in connection with formal investigation or litigation.
- Photo documentation, as detailed in Section 14.3
- For projects that included a commitment to utilize MWBE subcontractors as part of the Project Selection Protocol, invoices of payments to MWBE subcontractors as in the project application.
- Proof that the project has initiated an irrevocable standing order without an end date in the REC tracking registry through either a copy of the registry’s email acceptance of the irrevocable standing order or a screen shot of the irrevocable standing order screen showing the registry certification number of the system.

Variations in final system size (in aggregate inverter capacity AC) that exceed the larger of 5 kW or 25% (e.g. system sizes that are larger or smaller than the Part I approved project application) will be rejected and must re-apply. (Changes to the DC size of the system are governed by ensuring that the 155% DC/AC ratio is not exceeded; refer to Section 10.12 for the full requirement.) If the AC size difference at the Part II stage does not exceed those limits, the system will remain validly under contract. Provided it remains in the Part II system size requirements, a system that is developed at a size smaller than proposed in the original application will not be eligible for a higher price relative to the originally applicable price. Additionally, for any increase in system size at the Part II stage, the price per REC will be changed to the applicable REC price for the final system size. A project’s REC payment is based on the quantity of RECs estimated to be produced by the system, and this amount will be considered the lesser of the estimated production in Part I and Part II of the application. In this way, a system that is built smaller than planned will not benefit from excess REC payments that the final system cannot support as a result of its decreased production estimate. On the opposite side, if a project’s final size is larger than the planned size, an increase in the REC payment could present unexpected budget management challenges.

If a project is removed, then resubmitted, and then approved within 365 days of the initial removal, the collateral associated with the original system would be applied to the resubmitted system (and any excess refunded to the Approved Vendor); if not, the original collateral would be forfeited. The IPA will reserve the right to request more information on an installation and conduct onsite inspections or audits of projects to verify the quality of the installation and conformance with the project information submitted to the IPA. More detail on inspections can be found in Section 14 of this manual. Projects found not to conform with applicable installation standards and requirements, or projects found not to be consistent with information provided to the Program Administrator and the IPA, will be subject to removal from the program if the deficiencies cannot be remedied. Likewise, Approved Vendors who repeatedly submit projects with such problems may lose their Approved Vendor status.

The Program Administrator will review the Part II application and upon approval will notify the Adjustable Block Program Administrator of approval for REC contracting and payment.

Variations in the system layout between Part I and Part II are not allowed except in the following cases:

- Change in location of the system on a roof or parcel for any DG system or any system for a community solar project which was the only project on a parcel that took part in the project selection process, if held
- Increase in the surface area covered as long as the originally plotted footprint is still entirely covered by the solar array or associated equipment or wiring
- Decrease in the surface area covered as long as the solar array and any associated equipment or wiring remains entirely in the originally plotted footprint
- Changes in location on a parcel made to provide access paths through the solar array in order to access an otherwise stranded portion of the parcel
- Changes in location on a parcel made to account for parcel unsuitability that was not apparent in the Approved Vendor's commercially reasonable investigation of the property when conducting the initial project design
- Switching between rooftop and ground-mounted
- Switching between tracking system types and non-tracked systems is allowed; however, the lower of the Part I capacity factor or Part II capacity factor must be used. Switching tracking system types by itself is not sufficient to qualify for an exception. At least one additional criterion herein must be met to qualify for an exception

Approved Vendors may request approval for other changes; such approval will be granted if the Approved Vendor can demonstrate to the Program Administrator that the change was made due to factors that were not apparent in the Approved Vendor's commercially reasonable investigation of the project when conducting the initial project design and which would not constitute gaming of the project application or selection process.

## 8.6. Development Timelines and Extensions

Following a project's coming under an ILSFA REC contract, if the project is not completed in the time allowed (plus any extensions granted, as described further below), it will be canceled and removed from the schedule on its contract, and the REC volume associated with the project will be eliminated. The Approved Vendor will also forfeit the posted collateral associated with the project.

A project that is not completed in time and deemed canceled may be subsequently included in a future batch submitted by an Approved Vendor but will be treated as a new system rather than a resubmitted system and will receive a REC price applicable at that time.

Extensions will be granted for the following circumstances:

- An indefinite extension will be granted if a system is electrically complete (ready to start generation) but the utility has not approved the interconnection. The Approved Vendor must document that the interconnection approval request was made to the utility within 30 days of the system being electrically complete, yet not processed and approved.
- A six-month extension will be granted for documented legal delays, including permitting delays.
- One six-month extension will be granted upon payment of a refundable \$25 per kW extension fee for DG systems, and up to two six-month extensions for community solar projects (the second extension is only for achieving the required subscriber rate, not for project completion and energization, and will require an additional refundable \$25 per kW fee). The extension fee(s) would be payable to the contracting utility and would be refunded as part of the first (or only for systems up to 10 kW) REC payment.

The IPA may also, but is not required to, approve additional extensions for demonstration of good cause (i.e., supply chain issues demonstrated to have been caused by covid-19). The IPA is aware of potential delays in receiving updated interconnection cost estimates (particularly for community solar projects on a crowded feeder queue) that could delay system completion timelines, possibly pushing electrical completion beyond the period contemplated in the contract at no fault of the developer; such delays would qualify as good cause for the approval of an extension.

## 9. Project Selection and Prioritization

Each program year, the LICs, LIDG, and NP/PF sub-programs are expected to open project submission windows for Approved Vendors to submit their proposed projects. Submission windows for ILSFA sub-programs may run congruently or separately from one another. Prior to the start of each program year, the Program Administrator will publish a calendar with the submission window timelines for each sub-program. The calendar for the ~~2020-2021~~-2022 Program Year submission window timelines is available [here](#).

After the close of the initial project submission window, project submissions will be reviewed by the Program Administrator for completeness of documentation and project eligibility. Only project

submissions determined to be complete and eligible will proceed with project selection. If the total incentive values of the eligible applications exceed the available funding, then projects submitted during the initial project submission window will be evaluated according to the Project Selection Protocol. If the total incentive values do not exceed the sub-program's available funding and any carveout thresholds are met, all eligible projects submitted during the initial project submission window will be selected. Selected projects are then sent to the ICC for approval. Project applications sub-programs with available funding remaining after the close of the initial submission window will be reviewed on a first-come, first-served basis. Projects may still be submitted after the initial project application window closes until the earlier of (i) the end of the program year, or (ii) when the Program Administrator announces that all sub-program funds have been allocated for that program year. This process will be described in more detail below.

For each program year, 25% of each sub-program budget will be reserved for EJC projects, although this 25% carveout will not be earmarked for either of RERF or utility funding.

The document linked immediately below outlines the revised Project Selection Protocol<sup>14</sup> for the ~~2020-2021-2022~~ program year. The Project Selection Protocol<sup>7</sup> describes how projects will be selected for ILSFA REC contracts in the event that project applications received during the project submission window for a given sub-program exceed that sub-program's available annual funding.

- [Project Selection Protocol](#)

## USE OF PROJECT SELECTION PROTOCOL

The Project Selection Protocol is triggered when the total incentive value of a sub-program's eligible projects is greater than the amount of funding available for that sub-program. In the case of the LIDG sub-program, the Project Selection Protocol is triggered based on the incentive values of projects submitted during the initial submission window in two sub-categories: 1-4 unit projects and 5+ unit projects. Project selection will be necessary if the incentive value of the total submitted projects exceeds the sub-program budget or if the incentive value of 5+unit projects exceeds 75% of the total sub-program budget.

The Protocol is described in detail in the document linked above. The most recent version of the Protocol was published in ~~June 2020~~March 2021 and ~~reflects changes made in the Revised Plan along with~~includes updates based on observations from the project selection processes conducted in the ~~2018-2019 and, 2019-2020, and 2020-2021~~ program years.

## WAITLIST PROCESS

Should unselected eligible projects remain following the completion of the Project Selection Protocol, a ranked waitlist will be created. Any project waitlist in a sub-program (including a waitlist created under the "First Come, First Serve" process described further below) will be treated as follows:

- Within a sub-program, if a project previously selected for that-program year later withdraws from ILSFA-during the same program year, the newly created budgetary capacity will be used to select the highest-ranked unselected projects on the waitlist, if any. If the withdrawn project causes the remaining selected EJC projects, in aggregate, to dip below 25% of sub-program budget, the highest-ranked EJC projects will receive a preference with the goal of reaching 25%.
- Note that Approved Vendors given a resizing decision have 15 business days to notify the Program Administrator of whether they will accept or refuse the resizing offer. Resizing decisions are presented to the Approved Vendor by the Project Administrator when the amount of funding that remains available for the program year in a given sub-program is less than the next waitlisted project's submitted REC incentive value.
- Eligible but unselected projects from the previous program year may re-apply for the next program year; however, those projects are given no additional consideration in the next program year for having been on the waitlist. In this case, the same previously submitted project information and documentation can be used within the online Approved Vendor portal unless otherwise noted. The Approved Vendor will be required to certify that the project information and documentation remains valid.

#### FIRST-COME, FIRST-SERVED PROCESS

If a sub-program has available funding following its initial project application window, a rolling project submission window will open on first-come, first-served basis. This could happen if the total incentive value from the sub-program's initial eligible project submissions is lower than the sub-program's available funding, or if less than 25% of the sub-program budget is filled with EJC projects through the Project Selection Protocol, or if previously selected projects withdraw during the course of the program year and the waitlist is emptied. The first-come, first-served application process will apply through the last day of the program year or until the remaining portion of the sub-program budget is allocated.

Projects will be considered throughout the program year in order of their Part I batch submission date. A waitlist will be created upon the exhaustion of the 75% non-EJC portion of the sub-program budget or 100% of the total sub-program budget (whichever comes first); projects may then still apply until the last day of the program year to be placed in order on the program year's waitlist. Once again, this waitlist is only used in the case of a previously selected project being withdrawn, the waitlist will not be used for subsequent program years. Once the 75% non-EJC portion of the sub-program is exhausted, only EJC projects will be considered. In general, projects will be first allocated to the utility budget within a sub-program. When a project's selection would exceed the remaining utility annual budget within a sub-program, it will be instead allocated to the annual RERF budget if possible.<sup>15</sup> If neither of those

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<sup>15</sup> The Agency reserves its right to shift the use of the utility funding as needed among sub-programs, as contemplated in Section 8.4.2 of the Revised Plan, with the restriction that per the ICC's Final Order in Docket No. 19-0838 approving the Agency's Revised Plan, funds will not be reallocated from the Low-Income Distributed Generation ~~Sub-Program~~sub-program to either of the other two ~~Sub-Programs~~sub-programs.

options is possible for a selected project due to constraints in the remaining RERF and utility budgets within the sub-program, the project will be granted the option to resize in the same manner as described in the Project Selection Protocol in order to fit within remaining unused RERF or utility budgets for the sub-program. A project that declines to resize will be placed on the sub-program's waitlist for that program year,<sup>16</sup> and the next project will be considered. A carveout of 25% of each sub-program budget for projects in EJs will be maintained through the close of the program year. Any unused budget capacity in an EJC carveout, as well as any unused RERF or utility budget within the sub-program remaining at the end of the program year will be rolled over to the sub-program budget of the next program year.

## 10. System Requirements

### 10.1. Current Laws, Regulations, and Codes

A complete description of the ILSFA program can be found in the IPA's [Revised Plan](#).

ILSFA is administered pursuant to Section 1-56(b) of the Illinois Power Agency Act (20 ILCS 3855), as updated by Public Act 99-0906 (known as the Future Energy Jobs Act or FEJA). The IPA is the state agency responsible for the program's implementation. Day-to-day administration of the program is the responsibility of the Agency's Program Administrator, Elevate ~~Energy~~, and partner firms GRID Alternatives, AECOM, and Shelton Solutions.

PV system installations may also be subject to local ordinances, regulations, or codes. The ILSFA program requires all installations to adhere to codes established by the Authority Having Jurisdiction of the installation location.

### 10.2. Licensing and Certification

For all ILSFA projects, the PV system installer must have a current [Distributed Generation Installer certification from the ICC](#).

### 10.3. Previously Used Equipment

Previously used equipment -may only be used if a) the Approved Vendor is able to demonstrate that they are providing a warranty equal to that of which would be available for the same equipment if it were new and b) demonstrate to the Program Administrator that the participant has been informed of,

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<sup>16</sup> The ~~2020-2021-2022~~ project waitlist within a sub-program would be eligible for use (including a resizing decision if necessary) for any new sub-program capacity that opens (i) ~~2020-if 2021-2022~~ project selections withdraw from the program during the ~~2020-2021-2022~~ program year (with a priority given to maintaining the 25% EJC carveout in the sub-program), or (ii) if the 25% EJC carveout for the ~~2020-2021-2022~~ program year is unfilled by the last day of the program year.

and agrees to, the use of used equipment. An acknowledgement form stating that previously used equipment will be part of their system must be signed by the participant and uploaded as part of the Part I project submission. This acknowledgement form will be available in the Approved Vendor Portal and Approved Vendors are responsible for collecting it from participants.

## **10.4. System Location**

All PV systems must be entirely located in Illinois and interconnected to the distribution-level electrical grid of an Illinois investor-owned utility or Illinois electric cooperative or municipal electric system. Off-grid systems are not eligible for the ILSFA program. PV systems must be built at the location specified in the Part I application and must remain at the approved location for the duration of the 15-year contract and may not be relocated.

ILSFA PV system designs should minimize shading and placement of modules and arrays in low yield locations to the greatest extent possible.

Additional disclosure requirements are being considered to ensure that potential participants have accurate expectations in terms of PV system production for projects with arrays below a yet-to-be determined Specific Yield (kWh AC/kWp DC) threshold as a part of establishing adequate consumer protections. Any additional requirements and Specific Yield thresholds will be distributed as an announcement outlining the specific requirements and forms, along with an effective date.

## **10.45. Interconnection Date**

All PV systems must have a final interconnection approval (or equivalent from rural electric cooperative or municipal electric utility) dated on or after June 1, 2017. For systems installed after June 1, 2017, but before the launch of the ILSFA program, certain conditions are required to meet program requirements related to consumer protections and customer contracts. Please review those documents/sections for details on satisfying those requirements.

## **10.56. Installer Requirements**

While using a Qualified Person for installation is not required by ILSFA, the ICC requirements for using a Qualified Person for DG projects still applies. LIDG projects must therefore be installed by a company with a current [Distributed Generation Installer certification](#) from the ICC.

As such, every installation of a DG system will be performed only by:

- A qualified person; or
- An electrical contractor who is not a Qualified Person, provided he/she is directly supervised by a Qualified Person; or
- A person who is not a Qualified Person but is enrolled in a training program that, upon satisfactory completion, will meet the requirement to become a Qualified Person provided he/she is directly supervised by a Qualified Person.



Qualified Person means a person who performs installations on behalf of the certificate holder and who has either satisfactorily completed at least five installations of a specific DG technology or has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion:

- An apprenticeship as a journeyman electrician from a DOL-registered electrical apprenticeship and training program
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program
- An Underwriters Laboratories (UL) distributed generation technology certification program
- An Electronics Technicians Association (ETA) distributed generation technology certification program
- An Associate in Applied Science degree from an Illinois Community College Board-approved community college program in the appropriate distributed generation technology

To be considered a Qualified Person, the experience and/or training relied upon must be with the same type of DG technology for which the qualification status is sought.

## 10.67. Expansions

An expansion to an energized system that is already under an ILSFA or Adjustable Block Program (Illinois Shines) contract must be independently metered (with a separate GATS or M-RETS ID) and will be issued a new contract or product order independent from ~~the contract that~~ of the original system. The expansion must comply with all program rules in effect at the time the expansion application is submitted.

An expansion is defined as (i) additional distributed generation capacity at the same parcel if (a) serving the same customer, or (b) serving an affiliated customer, or (c) commonly owned, with respect to an existing contracted LIDG or NP/PF; or (ii) additional community solar capacity on the same or adjacent parcel and under common or affiliated ownership with respect to an existing contracted LICs project.

Expansions are subject to the following additional requirements:

1. The expansion will only be compensated up to the maximum 2 MW size limit when added to the original system at that location. For example, if a location already has a 1.9 MW system under an ILSFA REC contract at that location and a 200 KW system is added, a new REC contract will only be granted for the estimated production of a 100 KW system.
2. If an existing system is already in place that is not a part of ILSFA or the Adjustable Block Program (Illinois Shines) and the expansion is the only portion applying to the program, then the REC incentive price will be solely determined by the size of the expansion rather than the total system size.

## 10.78. Co-location

### CO-LOCATION OF DG PROJECTS

The total capacity of DG systems enrolled in the ILSFA or Illinois Adjustable Block (Illinois Shines) Program at a customer's location will be considered a single system (e.g., three 100 kW systems at a single location will be considered a 300 kW system). For purposes of determining the system's REC price, a system's location is considered to be a single building (regardless of the number of utility accounts at the location) for rooftop installations and a single property parcel for ground-mounted systems (if a property has both rooftop and ground-mounted systems, it will be considered a single system). Additionally, systems located on multiple different rooftops or ground locations on the same parcel will be considered a single system (for purposes of measuring size in kW<sup>17</sup>) if each system is owned by the same entity or its affiliates.

If two or more projects on one parcel are separately owned and serve to offset the load of separate entities, then in order to have these arrays considered as separate projects, an Approved Vendor must provide proof that the occupants are not affiliated entities and each has a separate utility meter and separate utility billing.

### CO-LOCATION OF NON-PROFIT/PUBLIC FACILITIES PROJECTS

NP/PF projects that are co-located shall follow the same requirements as the co-location of DG projects, described above.

### CO-LOCATION OF LOW-INCOME COMMUNITY SOLAR PROJECTS

1. No Approved Vendor may apply to ILSFA for more than 4 MW of community solar projects on the same or contiguous parcels (with each parcel of land defined by the County the parcel is located in).
2. Co-located projects totaling more than 2 MW of community solar may be permissibly located in one of two ways:
  - a. Two projects, of up to 2 MW each in size, on one parcel or contiguous parcels; or
  - b. One project, of up to 2 MW, on each of two contiguous parcels.
3. Multiple projects up to 2 MW in aggregate on the same parcel with the same owner will be considered a single project for the purposes of REC pricing as well as size criteria in the case of a lottery.
4. A parcel of land may not have been divided into multiple parcels in the two years prior to the project application in order to circumvent this policy. If a parcel has been divided within that time period, the requirement will apply to the boundaries of the larger parcel prior to its division.

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<sup>17</sup> Although multiple 1-4 unit buildings in this scenario will likely still receive 1-4 unit pricing, Approved Vendors should discuss specific scenarios with their assigned Vendor Manager

5. If there are multiple projects owned or developed by a single entity (or its affiliates) located on one parcel of land or on contiguous parcels of land, any size-based adders will be based on the total size of the projects owned or developed on the contiguous parcels by that single entity or its affiliates. Furthermore, the total combined size of projects owned or developed by a single entity (or its affiliates) on contiguous parcels of land may not be more than 2 MW, or more than 4 MW if co-located consistent with the provisions outlined above.
  - a. Affiliate is defined as, with respect to any entity, any other entity that, directly or indirectly through one or more intermediaries, controls, is controlled by, or is under common control with each other or a third entity.
  - b. Control is defined as the possession, directly or indirectly, of the power to direct the management and policies of an entity, whether through the ownership of voting securities, by contract, or otherwise. Affiliates may not have shared sales, revenue-sharing arrangements, or common debt and equity financing arrangements.
  - c. Contiguous is defined as touching along a boundary or a point. For example, parcels touching along a boundary are contiguous, as are parcels that meet only at a corner. Parcels, however near to each other, that are separated by a third parcel and do not touch along a boundary or a point are not contiguous.
  - d. Additionally, parcels that are separated by a public road, railroad, or other right of way accessible at all times to the general public are not considered contiguous.
6. Projects owned or developed by separate entities (meaning that they are not affiliates) may be located on contiguous parcels. If there is a naturally good location from an interconnection standpoint, one owner should not be allowed to prevent another owner from developing a project in that location.
7. Projects must have separate interconnection points.
8. There is a separate REC price for co-located systems exceeding 2 MW in aggregate size. Where the initial project under 2MW in capacity has been contracted at the non-co-located system REC price, the REC price applicable to subsequent systems (up to 4MW total) will be adjusted downward to create contract value across the two co-located systems that reflects the aggregate system capacity exceeding 2 MW.

## ASSIGNMENT OF CO-LOCATED PROJECTS

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendor. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being received by the Transferee AV.

## REC ALLOCATION OF CO-LOCATED PROJECTS

If a single project is developed and then a second, co-located project is developed on the same or a contiguous parcel at a later date, the approaches above contemplate that these two projects will be considered co-located and co-located project prices will apply. To make this price adjustment the least administratively burdensome on all parties involved, the price adjustment for both projects will only be applied to the second project, with that project's REC price reflecting not only the co-located project

price, but also an additional discount reflecting the differential between the first project's contract price and the applicable co-located project price. This co-located pricing provision will only be applicable if the Commission's approval date of the second project is within one year or less of the Commission's approval date of the first project. If the first project has not yet commenced construction at the time of the second project's approval, then the co-located pricing provision will apply. In the case that there are two co-located projects on a single parcel (or two contiguous parcels) owned by a single entity or represented by a single Approved Vendor, any sale of one project to a different owner or transfer of one project to a different Approved Vendor would not avoid the price adjustment that applies to co-located projects. In such a case, the second project's REC price would be adjusted to a price accounting for both co-located projects (i.e., below the listed co-located project price) in line with the description above. This restriction also applies to projects that are accepted off the waitlist that would render an already developed project a co-located project.

## **10.89. Site Control**

TheFor project application, the Approved Vendor must provide a written binding contract, option, or other demonstration of site control acceptable to the Program Administrator for all projects where the Approved Vendor is not also the project owner and the host.

## **10.910. Site Map**

The site map must be provided with each application which shows property boundaries, any structures on the property, and the location of the solar array(s). Roof-mounted arrays must include a map showing the location of the solar array(s) on the roof. All electrical improvements that are not co-located with the solar array must also be shown (e.g., trenching from ground-mounted arrays to the property power source or upgrades to the transmission system). Any modifications planned for the site should also be indicated on the site plan (e.g., removal of trees or other obstructions).

## **10.1011. Shading Study**

A shading study shall be completed for all projects. This can be an onsite shading study performed using shading study software or by a person with experience performing such studies.

To use ~~the standard capacity factor or~~ the PVWatts estimated production, a system must meet the minimal shading criterion as follows:

No obstruction is closer than a distance (D) of twice the height (H) it extends above the PV array. All obstructions that project above the point on the array that is closest to the obstruction shall meet this criterion for the array to be considered minimally shaded. Any obstruction located north of all points on the array need not be considered as shading obstructions. Obstructions that are subject to this criterion include:

- Any vent, chimney, architectural feature, mechanical equipment, or other obstruction that is on the roof or any other part of the building
- Any part of the neighboring terrain

- Any tree that is mature at the time of installation of the PV system
- Any tree that is planted on the building lot or neighboring lots or planned to be planted as part of landscaping for the building (the expected shading shall be based on the mature height of the tree)
- Any existing neighboring building or structure
- Any planned neighboring building or structure that is known to the applicant or building owner
- Any telephone or other utility pole that is closer than 30 feet from the nearest point of the array

Note, the use of a standard capacity factor will be removed as an option for the method of production estimation used for applications beginning in Program Year 4, as explained in Section 10.1112.

## 10.12. REC Quantity Calculation

~~The application portal will automatically calculate 1) the PVWatts estimated production and 2) a production estimate using the standard capacity factors<sup>18</sup> of 16.42% for fixed mount or 19.32% for single or dual-axis tracking systems. An applicant will be allowed to choose either of these numbers, rounded down to the nearest REC for the 15-year contract REC delivery amount.~~ 1. The application portal will automatically calculate the PVWatts estimated production. The use of a standard capacity factor will be removed as an option for the method of production estimation used for applications in the ILSFA portal starting at the onset of Program Year 4. <sup>19</sup> Approved Vendors will instead be able to select from the option of either a capacity factor calculated in the portal using PVWatts or proposing an alternative capacity factor. An applicant will be allowed to choose either of these numbers, rounded down to the nearest REC for the 15-year contract REC delivery amount. This change will comport with the provisions of Section 6.14.5 of the Revised Plan which removed references to the use of standard capacity factors (which had been an option in the Initial Plan). Project applications submitted prior to Program Year 4 that utilized a standard capacity factor are not impacted. The PVWatts capacity factor will be calculated automatically by the portal using PVWatts Version 5 and the following inputs:

- a. System address as entered by the Approved Vendor
- b. Module type: standard
- c. System losses: 14%
- d. Array type will be based on Approved Vendor input for system type using the following:
  - i. Fixed open rack for non-tracking ground mount systems

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<sup>18</sup> ~~All capacity factors referenced in this section are average capacity factors calculated over the 15-year REC contract period and incorporating an assumption of 0.5% annual production degradation. The capacity factors are in relation to AC-rated nameplate capacity.~~

<sup>19</sup> All capacity factors referenced in this section are average capacity factors calculated over the 15-year REC contract period and incorporating an assumption of 0.5% annual production degradation. The capacity factors are in relation to AC-rated nameplate capacity.

- ii. Fixed roof mount for non-tracking roof-mounted systems
    - iii. 1-Axis for single axis tracking systems
    - iv. 2-Axis for dual axis tracking systems
  - e. Tilt angle: tilt angle entered by Approved Vendor
  - f. Azimuth angle: azimuth angle entered by Approved Vendor
  - g. DC/AC ratio: actual ratio based on Approved Vendor inputs for DC and AC capacity
  - h. Inverter efficiency: as entered by Approved Vendor (if blank a default of 96% will be used)
  - i. Degradation: 0.5% per year (alternative degradation rates will not be accepted)
2. Applicants can also use an alternative capacity factor, which may be larger than the standard or PVWatts capacity factor, if such a selection was obtained using a custom software tool designed to calculate such capacity factors or calculated by a professional engineer. Approved Vendors can always choose a number lower than the standard, PVWatts, or alternative capacity factor if they determine it is appropriate. Any arrays 1) with an azimuth greater than 270 or less than 090, 2) with a tilt of greater than 80 degrees, or 3) that do not meet the minimal shading criterion may not use the ~~standard capacity factors or the~~ PVWatts estimate and must use an alternative capacity factor.
3. Any proposed alternative capacity factor that is calculated using a proprietary third-party software tool may be subject to audit by the Program Administrator. A PDF document must be submitted for each project that, along with the full system design provided in the Part I application, allows the Program Administrator to verify the proposed alternative capacity factor. The requirements for this PDF document are: 1) the shading and production report(s) from the design software used, 2) the shading object(s) input information, and 3) the array input information. Alternately, this may include a requirement that the Approved Vendor provide a copy of the third-party software tool with appropriate licenses to the Program Administrator as well as providing the proprietary file or all inputs to the tool in a manner which will allow the Program Administrator to replicate the generation claimed. This software licensing will only be required on a case-by-case basis as determined by the Program Administrator who will conduct both random and targeted audits of alternative capacity factors. Any capacity factor that results in a REC quantity calculation that differs by more than +/-20% from the PV Watts REC quantity calculation requires the Approved Vendor to confirm that the entered capacity factor is intentional.
4. The Program Administrator will evaluate systems using non-standard technologies such as bifacial panels or seasonally adjusted tilt on a case-by-case basis.
5. Any capacity factor that is approved for Part I of an application will be the maximum capacity factor that the system may use even if changes to the final as-built system would result in a higher capacity factor. However, any changes to the system between the Part I and Part II approval that would lower the capacity factor will result in a capacity factor reevaluation and the new, lower Part II capacity factor must be used. The Part II capacity factor cannot be greater than the Part I capacity factor. If there is a new, lower Part II capacity factor, again stated relative to the system size in AC, it will be used, rather than the Part I capacity factor, for calculating payments under the REC contract and the annual REC delivery obligations under the REC contract.

6. At the Part II application, the Approved Vendor will be asked to update system parameters, if needed. As an additional check, photographic evidence and possibly on-site inspections will be used to verify the final system parameters. If the standard capacity factor was used at the Part I application ~~—and if (prior to the project is still eligible for the standard capacity factor based on its updated shading criteria, azimuth, and tilt—onset of Program Year 4)~~ then the standard capacity factor will continue to be used as the Part II capacity factor and applied to the Part II system size, discussed below. If PVWatts was used at the Part I application to calculate a capacity factor, then PVWatts will be used again based on the updated Part II system parameters to calculate a Part II capacity factor. If PVWatts calculates a higher capacity factor for Part II relative to Part I, the lower capacity factor from Part I will be used. If a custom capacity factor was used at the Part I application stage, the same custom capacity factor (or lower custom capacity factor, if reduced per above) will be used and applied to the Part II system size. Switching among production estimate calculation methodologies between Part I and Part II is permitted only if accompanied by a decrease in the capacity factor. Subject to all of the above, the lower of (i) the product of the Part I capacity factor and the Part I project size and (ii) the product of the Part II capacity factor and the Part II project size will be used to establish a number of RECs for contractual payment and delivery obligation.
7. Modifications to Part I project parameters may be permitted prior to the Program Administrator’s approval of the Part I application, but only if these modifications do not increase the 15-year REC quantity.
8. All projects require the submission of a PDF output of the system design, including the shading study.

## **10.1213. System Size**

1. All system sizes described in this manual are AC system size based on the aggregate inverter size (e.g., a system with a single 10 kW inverter is considered a 10 kW system even if it has 12 kW of STC DC capacity).
  - a. Inverter capacity shall be measured as the nameplate maximum continuous output.
  - b. An inverter shall be connected to a solar panel in order to be considered part of the AC system size. In the case of microinverters that contain two inverters per unit, only the inverters connected to a panel shall be included in the AC system size.

Systems will be limited to a DC capacity of 155% of the AC capacity (for example, a 10 kW AC system can contain a maximum of 15 kW in STC DC capacity). An Approved Vendor may request an exemption for this requirement, but exemptions will only be granted for good cause and at the discretion of the Agency and its Program Administrator.

## **10.1314. Systems with Battery Backup**

All systems which include a battery shall be electrically connected in a manner which ensures that any non-solar generated electricity used to charge the battery is not later metered as solar-generated power. This can be done in one of ~~two~~three ways:

1. The meter used to report production is electrically located before the battery charger and does not measure any power that is drawn from the battery bank.
2. A net meter is connected to the system that runs in reverse when any non-solar power, including onsite generator power, is used to charge the battery bank. ~~This must be an integral part of the physical system design. An inverter which can be configured using software to preclude non-solar charging of the battery bank is not sufficient if that inverter is used as the source of reporting for renewable generation.~~
3. The inverters' software setting is configured to prevent the battery from charging via line power. This software setting may not be changed for the duration of the project's participation in ILSFA.
4. For systems that include a battery, a detailed schematic must be provided showing that either only solar-generated power can be used to charge the battery, that the battery's output does not run through the meter used to measure solar output, or that a password-protected software setting is enabled for the duration of the project's participation in ILSFA that prevents the battery from charging via line power.

## 10.1415. Systems that Directly Serve DC Loads

The IPA does not wish to inadvertently prohibit participation in the program by PV systems that do not convert the DC electricity produced to AC electricity. However, for the reasons addressed below, the IPA is still in the process of developing standards for allowing program participation from DC-only systems.

Certain difficult questions arise in considering how to structure such systems' participation, particularly, how to estimate the system's 15-year REC production for purposes of establishing a contractual delivery obligation. The Revised Plan allows systems to use an alternative capacity factor based upon an analysis using PVWatts or an equivalent tool. This may be challenging, however, given that the alternative capacity factor ordinarily must be multiplied by a system's nameplate capacity (measured based on the aggregate inverter size in kilowatts AC), and in a DC-only system, the capacity of solar panels may significantly exceed the inverter size. An alternative approach may be to assume an inverter equal in size to the DC PV array (e.g., if such a system has 10 kW DC of panels, the IPA could assume an inverter size of 10 kW AC and then multiply by a standard capacity factor). The IPA plans to continue receiving feedback from and working with interested parties with the hope of developing manageable standards for allowing participation from DC-only systems. Pursuant to the Agency's Revised Long-Term Renewable Resources Procurement Plan, it is still premature to incorporate a DC metering standard into the ILSFA program, but the IPA is committed to continuing its dialogue with industry professionals to understand the development of DC metering.

## 10.1516. Metering

1. Systems registered in M-RETS must utilize an ANSI C.12 certified revenue quality meter.
2. Systems over 25 kW registered in GATS must utilize a new meter that meets ANSI C.12 standards.
3. Systems over 10 kW and less than 25 kW in size registered with GATS must utilize a meter that meets ANSI C.12 standards. Meters that are refurbished (and certified by the meter supplier) are allowed.



4. Systems of 10 kW in size and below registered with GATS must utilize either a meter that is accurate to +/- 5% (including refurbished and certified meters) or an inverter that is specified by the manufacturer to be accurate to +/-5%. The inverter must be UL-certified and must include either a digital or web-based output display. Inverters with integrated ANSI C.12 compliant meters are allowed with a specification sheet showing this standard has been met.
5. No system is required to have automated or remote meter reporting capability, although such meters are allowed if they meet the requirements listed above.

**TABLE 10.1. METERING REQUIREMENTS**

Registry	System Size	Accuracy	New vs. Refurbished	Meter vs. Inverter
M-RETS	All	ANSI C.12 revenue grade	Unspecified	Meter only
PJM-GATS	>25kW	ANSI C.12 revenue grade	New only	Meter only
	>10kW and <25kW	ANSI C.12 revenue grade	Refurbished is acceptable	Meter only
	<=10kW	+/- 5%	Refurbished is acceptable	Inverter acceptable (must be UL-certified with digital or web-based output display)

## 10.1617. No Partial Systems

All systems submitted to ILSFA must include the entire output of the system (recognizing, of course, the REC delivery obligations for community solar projects correspond to only the subscribed shares of low-income households or the single anchor tenant for those projects). Any capacity of a system which is designed to sell RECs to another party and will not be part of ILSFA must be separately metered with a separate inverter.

# 11. Renewable Energy Credit Management

## 11.1. Contracting Process

### REC CONTRACTING OVERVIEW

Once a batch has been approved after Part I project submission and selected according to the Project Selection Protocol, the ILSFA Program Administrator coordinates with the Adjustable Block Program Administrator to facilitate REC contracting. Project data will be shared between administrators to leverage the ABP REC management systems and to provide a streamlined contracting process for Approved Vendors, utilities, and the Agency.

## SOURCE OF FUNDS AND THE COUNTERPARTY

Program funding comes from two sources: 1) the state-held Renewable Energy Resources Fund (RERF) and 2) utility-held funds collected from the Renewable Portfolio Standard riders. Each approved batch will be wholly funded by one or the other source, with utility funding being prioritized by the Agency until an annual utility budget is exhausted. Projects funded by utility-held funds require contracting for REC purchases between an Illinois electric utility and the Approved Vendor. RERF-funded projects require contracting for REC purchases between the Agency and the Approved Vendor. The Approved Vendor is not able to choose or request one contractual counterparty or the other at the time of application.

## REQUIRED DOCUMENTS, CONTRACTS, AND AGREEMENTS

- The Renewable Energy Credit Agreement or “REC contract” (which includes the “Master Renewable Energy Certificate Purchase and Sale Agreement” and the “Cover Sheet”) is initiated between the Approved Vendor and the utility counterparty or the Agency. The REC contract is executed once between counterparties and establishes the agreed framework for contracting and delivering RECs across multiple contracts and projects. Revised contracts will be available for projects approved for PY4.
- The REC contract is the agreement representing a batch or batches (each batch memorialized through a Product Order) of projects contracted for delivery between counterparties.
- The Product Order is an agreement representing a single transaction or batch, which may include multiple projects within a single sub-program.

More detail on the REC requirements can be found in each of the [ILSFA Standard REC Contracts](#) (i.e., the standard contract between an Approved Vendor and the Agency, and the standard contract between an Approved Vendor and an electric utility). Additionally, if an Approved Vendor is assigning their entire REC contract or any product orders/batches in their entirety to another Approved Vendor, the [Acknowledgement of Assignment](#) and [Acknowledgement of Assignment and Consent](#) must be signed. More information about this can be found in the [Assignment FAQ](#).

## ILLINOIS COMMERCE COMMISSION APPROVAL

The ICC meets approximately every two weeks. Both Program Administrators will strive to efficiently process approved batches for submittal to the ICC. The IPA and the Program Administrators understand that ICC practice is that items for consideration by the ICC must be submitted to be placed on its open meeting agenda at least eight business days prior to each meeting. For an Approved Vendor’s first batch or batches with a given counterparty (either a utility or the Agency), the batch(es) will constitute a new REC contract. Subsequent batches will be included in separate Product Orders under the existing REC contract.

When the Adjustable Block Program Administrator submits contract (or Product Order) information to the ICC for approval, that submittal will include the Agency’s and ILSFA Program Administrator’s recommendation for approval of the batch, with a summary of factors relevant to Revised Plan compliance and pertinent to the ICC’s standard of review for batch approval. Once a batch is approved by the ICC, the applicable utility or the Agency will execute the REC contract (or Product Order). The

Approved Vendor will then be required to sign the REC contract (or Product Order) as approved by the ICC within seven business days of receiving it.

#### FAILURE TO EXECUTE THE CONTRACT

Approved Vendors that do not execute an ILSFA REC contract (or Product Order) after project selection, submission to the ICC for approval, the ICC'S approval, and contract execution by the Buyer (the applicable utility or the Agency) may face disciplinary measures impacting their status as an Approved Vendor in ILSFA moving forward. Any such discipline will be based on the Program Administrator's and IPA's review of the circumstances under which the contract (or Product Order) was declined.

Discipline may include a possible suspension or termination of the Approved Vendor's status under ILSFA. Suspension or termination will not impact an Approved Vendor's rights or obligations under already-executed contracts or product orders, but rather it will impact its ability to submit new project applications. Generally, the Program Administrator and the IPA will review all of the circumstances informing why a contract award was declined before the issuance of any discipline. Approved Vendors should provide a detailed, comprehensive explanation for why they declined to execute any contract or product order. If circumstances genuinely outside of an Approved Vendor's control necessitated non-execution, then discipline may have limited deterrent effect and may not be warranted, and thus the Approved Vendor's explanation may want to emphasize and explain any such circumstances. Neither the IPA nor the Program Administrator is able to provide a disciplinary determination in advance of non-execution to "pre-approve" such an action, nor can they provide a timeframe for the issuance of such determination after non-execution.

#### COLLATERAL

Following ICC approval of a batch, the Approved Vendor must post collateral for all systems in the batch within 30 business days. Initial collateral for any system is 5% of the total REC contractual value for that system, as follows:

- For LIDG or NP/PF projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application, or if already energized, based on the final capacity factor and the system size as built (if smaller than the proposed size).
- For LICS projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application, including a proposed REC price that uses solely the applicable ILSFA community solar REC price, plus the highest small subscriber adder. If already energized, this is based on (i) the final capacity factor and system size as built (if smaller than the proposed size), (ii) the anchor and non-anchor tenants shares, and (iii) the applicable anchor share REC price and ILSFA (non-anchor) REC price including the applicable small subscriber adder.

Collateral may be posted in the form of cash or a Letter of Credit. A Letter of Credit must use standard forms provided with the published REC contract; minor modifications may be allowed if approved by the contract counterparty.

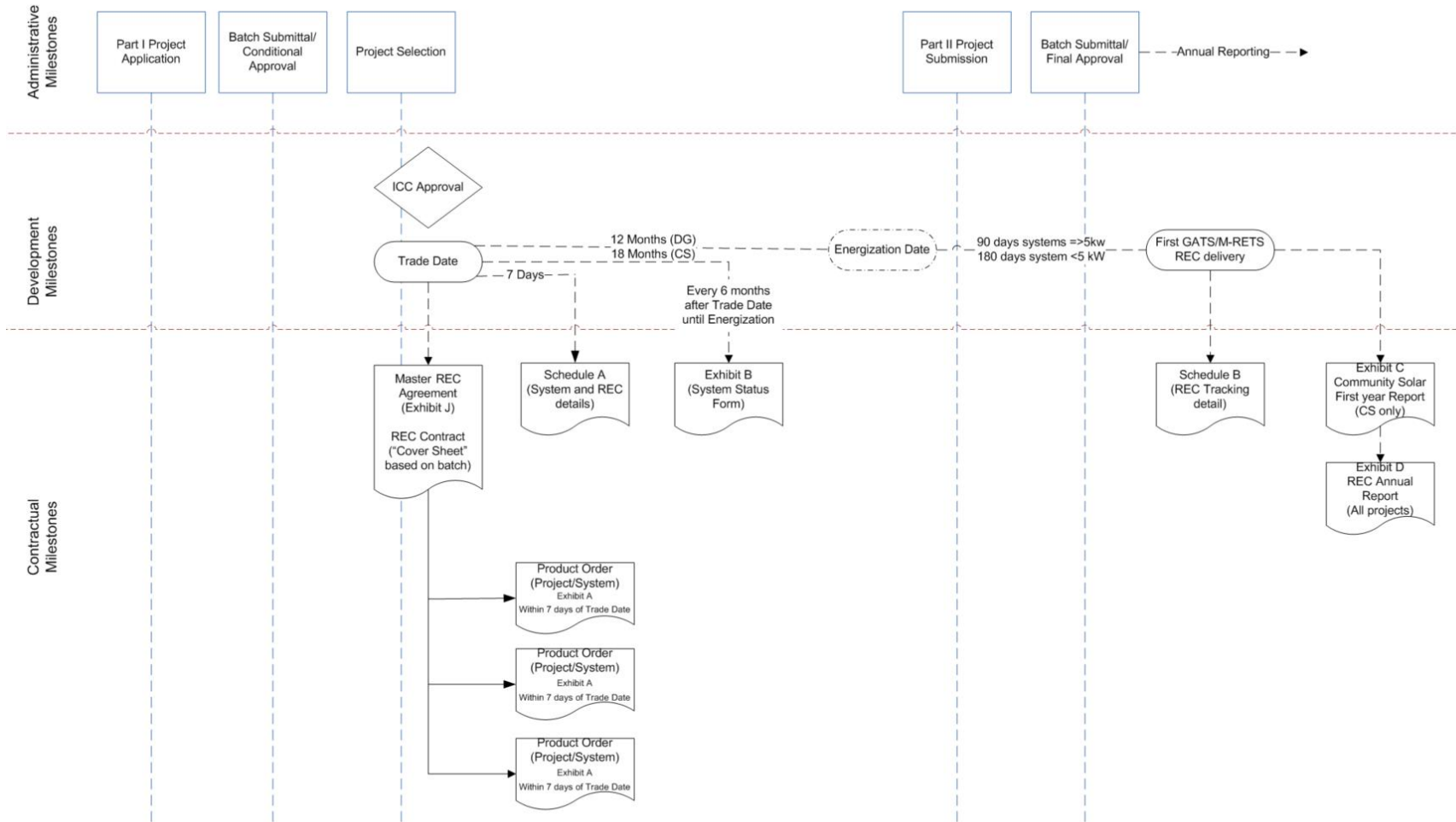
## 11.2. REC Delivery

All systems must be registered in either the PJM-GATS or M-RETS tracking registry. For systems larger than 5 kW, the first REC must be delivered within 90 days of the date the system is energized and registered in GATS or M-RETS. For systems smaller than 5 kW, 180 days for the first REC delivery will be allowed. The 15-year delivery term will begin in the month following the first REC delivery and will last 180 months.

Approved Vendors are required to set up an irrevocable 15-year Standing Order for the transfer of RECs from the system to the utility or Agency. Standing orders represent 100% of the capacity the system produces, except for community solar. Standing orders must be established without an end date. The applicable buyer (utility or Agency) of the RECs will cancel the order at the end of the REC delivery term. When registering a system in PJM-GATS or M-RETS, the Approved Vendor must incorporate ILSFA application ID into the name of the system, the Unit field, and the Note field. Where the IPA is the counterparty for a project's REC contract, and not ComEd or Ameren, Approved Vendors should use IPA's GATS account "Illinois Solar for All – IPA" as the recipient for the irrevocable standing order. Do not establish the standing order for the "IPA Transitional Account." Approved Vendors using M-RETS for REC delivery on projects where IPA is the counterparty should establish the irrevocable standing order with the account "IPA."

**DIAGRAM 11.1: ILLINOIS SOLAR FOR ALL REC CONTRACTING PROCESS**

The diagram below presents an overview of the REC contracting process from Part I project submission through energization and entering projects into the applicable tracking registry.



### 11.3. Low-Income Community Solar REC Value Calculation

- LICs projects which are not 100% subscribed at the time of energization will set up a standing order for the percentage subscription the project has met at that time. The standing order will be amended based on subscription levels at the end of the first year after energization.
- There are three subscriber-share types for LICs:
  - Anchor tenants
    - A single Anchor Tenant that is a non-profit organization or public entity
    - A single Anchor Tenant that is not a non-profit organization or public entity
  - Qualified low-income household subscribers
  - Non-qualified subscribers (all other subscribers)
- In addition to the three subscriber types, systems can qualify for a small subscriber adder, which is determined by the total shares of low-income household subscribers taking under 25 kW as compared to the total system nameplate capacity.
- A single anchor tenant that is not a low-income household (as defined below) will be allowed. The anchor tenant's share will receive the applicable Adjustable Block Program REC price; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA LICs price. The anchor tenant must be identified at the time of the Part I application.
- Other than the anchor tenant, all subscribers must be low-income households (defined as residential households that verify as 80% or less of AMI) for the project to receive REC payments for those subscription shares. At least 50% of total energy produced, excluding the anchor tenant's share, must be allocated to low-income subscribers by one year after the time of energization (e.g., if the anchor tenant's share is 30% of the project capacity, then at least 35% of total energy produced must be subscribed by qualified low-income households).
- Subject to the requirements above, any retail electricity customer in that utility's territory can subscribe to the remaining shares.
- Any unsubscribed shares or any shares subscribed by subscribers that are not low-income households (outside the single anchor tenant) will not be included in the contract, will receive no payments for their RECs, and will not be required to deliver RECs to the utility or Agency.
- All subscribers to a LICs project (including non-anchor, non-low-income residential subscribers) must receive and execute a Low-Income Community Solar Standard Disclosure Form.
- Subscription levels will additionally be verified with the interconnecting utility.
- LICs projects shall update these percentages at the end of the first year for fixing the final contractual value. Projects shall subsequently submit Annual Reports once per year based on their achieved subscription rates for the previous year with collateral drawdowns in some cases for failure to reach the contracted subscription percentages in a given delivery year. See Section 12 (Annual Reporting) of this manual for more detail.

### 11.4. Systems Already Energized at the Time of Contract Signing

Systems already energized at the time of REC contract signing, including systems energized on or after June 1, 2017, will be required to deliver their first REC within 90 days of contract signing, or 180 days for systems less than 5 kW. The 15-year delivery term will begin in the month following the first REC delivery and will last 180 months. Any RECs that were created prior to contract signing are not part of

the contract and will not be transferred to the utility or Agency under the contract or purchased by the counterparty under the contract.

## 11.5. Submitting REC Information to Tracking Systems

Approved Vendors are responsible for entering system production in the tracking registry where the system is registered. This must be done at least annually (and as frequently as monthly) and as necessary to ensure that the delivery of required RECs under contract is complete prior to the Annual Report submission date. Detailed information about creating RECs in the PJM-GATS system can be found at <https://www.pjm-eis.com/>. Detailed information for M-RETS can be found at <https://help.mrets.org>.

## 11.6. Assignment of REC Contracts

REC contracts entered into under the ILSFA program are assignable, and assignments may be made at either the batch (or “Product Order,” as used in the contract) or Master Agreement level. As required by the Revised Plan, assignments may only be made to entities registered with the ILSFA program as Approved Vendors. If the assignment is to an Approved Vendor already having a valid REC contract with the same counterparty through the ILSFA program, then the prior written consent of the counterparty utility is not required for that assignment and any batches transferred will constitute new batches under the Approved Vendor’s existing agreement with that counterparty. The Approved Vendor assignor must notify the IPA and/or utility counterparty of such an assignment made without the counterparty’s consent and provide that counterparty with the assignee’s contact and payment information.

Assignments of a product order may not be made within the later of a) 30 business days after the ICC approval date of the product order or (b) the posting date of collateral for the product order. In the case of the assignment of an individual batch, any surplus RECs associated with the batch remain with the original master agreement.

On assignment, an Approved Vendor’s ongoing collateral with respect to a transferred batch, if in cash form, may simply be applied to the transferred batch, while letters of credit will remain in place until the assignee posts replacement collateral. The Agency reserves the right to publish a standard acknowledgement form for assignments of the REC contract. Upon completion of the assignment, new contract documentation – including Exhibit A and associated schedules – will be developed by the Program Administrator to reflect the change in systems subject to the assignor’s original agreement and the assignee’s expanded or new agreement.

A detailed set of steps for initiating assignment of a product order(s) or a whole REC contract may be found [here](#).

## 11.7. Collateral Assignment

Collateral assignment of the REC contract by an Approved Vendor – i.e. pledging of the accounts, revenues, or proceeds in connection with any financing or other financial arrangements for a system or systems, but without relieving itself of performance obligations – is permitted at either the batch or Master Agreement level and does not require prior consent of the counterparty. The Approved Vendor must notify the IPA and counterparty utility (if applicable) of the collateral assignment made without the

counterparty's consent and provide the counterparty with the identity of and contact information for the financing party.

As financing parties are unlikely to be Approved Vendors but may become assignees of a batch (Product Order) or an entire REC contract due to foreclosure or default under financing arrangements, the requirement that such an assignee be an Approved Vendor will be waived for 180 days following such a transfer. The new assignee would then have 180 days to either a) become an Approved Vendor itself, or b) assign the batch or Agreement to an Approved Vendor.

For more information on assignment or collateral assignment, please see Section 9.2 of the Master REC Agreement within the REC contract.

## 12. Annual Reports and System Performance Evaluation

### 12.1. REC Delivery Performance Annual Report

At the time of energization, a schedule of annual REC deliveries over 15 years will be set, based on the system's approved capacity factor and a 0.5% annual reduction of delivery obligations.<sup>20</sup> On an annual basis, each Approved Vendor will submit an Annual Report of the contracts and systems in its portfolio using the Approved Vendor portal at [elevateenergy.force.com/ApprovedVendor/s/login/](http://elevateenergy.force.com/ApprovedVendor/s/login/). The Annual Report will serve as the basis for verifying that the RECs from projects are being delivered to the applicable counterparty. Absent corrective actions taken by the Approved Vendor, the Annual Report serves as a tool to determine what actions may be taken by the utilities or Agency to enforce the contractual requirements that RECs are delivered, including, but not limited to, drawing on collateral. Additionally, the Annual Report will be used by the Agency and Program Administrator to consider the ongoing eligibility of an Approved Vendor to continue participation in the program. For all systems, the Annual Report will include information on:

- RECs delivered by each of the systems in the portfolio
- Status of all systems that have been approved, but not yet energized, including any extensions requested and granted
- Energized systems that have not delivered RECs in the year
- Status of annual job training hours and requirements
- Balance of collateral held by each utility
- A summary of requests for REC obligation suspensions, reductions, or eliminations due to force majeure events

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<sup>20</sup> An Approved Vendor may request for a system's annual REC delivery obligations to be reduced in mid-contract. The Buyer and Seller would then seek to negotiate a settlement payment as part of the reduction in delivery obligations; the Buyer would not be required to ultimately accept the request.



- Information on consumer complaints received
- Status of identified inspection and/or installation deficiencies

Each Approved Vendor will be able to change its point of contact for completing the Annual Report at any time, if desired.

## 12.2. Reporting for Community Solar Projects

### ANNUAL REPORTING FOR COMMUNITY SOLAR PROJECTS

The following are items that must be included in the Community Solar Annual Report:

- Percentage of each system subscribed on a capacity basis
- The number and type of subscribers (e.g., low-income households, anchor type, non-qualifying subscribers), including capacity allocated to each type
- Income verification information for all new low-income household subscribers
- Subscriber turnover rates
- Verification that community solar disclosures were signed by all new subscribers
- 100% low-income ownership status, if applicable

The Community Solar Annual Report will require the Approved Vendor to enter each subscriber, subscriber type, the subscriber's contract start date and end date (if it fell within the current reporting year), whether the subscriber meets the small subscriber requirements and the subscriber's subscription size in kW. The portal will automatically prorate all data to determine the average subscription amount and percentage of small subscribers based on this data. Small subscriber share is determined by the share of low-income household subscribers only. A signed disclosure form is required for a given subscriber to count towards a community solar project's subscriber tally in the Annual Report. As with project cost data, the IPA will treat this information as confidential and proprietary and will provide protection of this information as required under Section 1-120 of the IPA Act (including asserting any applicable protections in response to FOIA, discovery, or other requests).

Approved Vendors will be given 90 days to cure any deficiencies in the information reported, as found by the Agency and/or utilities. Failure to cure deficiencies may result in the contracting utility and/or the Agency drawing on collateral. In addition, Approved Vendors' program eligibility may be jeopardized by failure to address and cure deficiencies.

The Agency will review the Annual Reports as well as utility-reported information on REC deliveries and community solar subscribers to assess compliance with the requirements of the ILSFA program and, if there are underperformances, coordinate with the applicable utility draw on collateral. That process is described below.

### ESTABLISHING AND REPORTING SUBSCRIBER SHARES

The community solar project shares in place at the time of the project's energization will establish the basis for the project's approval at Part II of the project application. At energization, the anchor tenant must be identified, including their share in kW and whether they qualify as a non-profit organization or a public entity. In addition, by one year after energization, the share of qualified low-income households must be at least 50% of the non-anchor share. The collective share of anchor tenant and low-income

household subscribers, as indicated in the Part I application, will be the basis for the REC contract approved by the ICC. The collective share of anchor tenant and low-income subscribers established upon energization and further adjusted one year later will be the benchmark for Annual Reporting and potential collateral drawdowns under the REC contract. Subscriber types will each receive different consideration for REC payments, with:

1. The Anchor Tenant receiving the applicable Adjustable Block Program REC value; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive the ILSFA LICs REC value.
2. Qualified low-income households receiving the applicable ILSFA REC value, and all other subscribers not included in the REC contract and not receiving the REC value.
3. The percentage of small subscribers (correlates only to low-income household shares as a share of the total physical project size)

At the first annual reporting period, shares are reported by the Approved Vendor for each subscriber type, providing an opportunity to increase the total aggregate share in kW for the REC contract if subscription to the full project size was not achieved at energization. Further, the subscriber mix and the value of RECs for those subscribers at the time of the first Annual Report will establish the ongoing contract requirements for this system. At the time of the first Annual Report, coinciding with the last day of the last quarterly period reported, the REC contract will be adjusted based on the following:

1. The quantity of RECs shall be based on the percent of Actual Nameplate Capacity that has been subscribed by the Anchor Tenant and qualified low-income customers (known in the REC contract as End Use Customers).
2. The Non-Anchor Tenant Contract Price shall be adjusted based on the Community Solar Subscription Mix; e.g. if the share of qualified low-income subscribers increases to a level that qualifies for a higher small subscriber price adder, then all low-income subscriber shares now can sell their RECs at the ILSFA price plus the applicable small subscriber adder.
3. The Anchor Tenant Contract Price shall remain unchanged.
4. All shares and REC prices at this milestone will serve as the benchmark for all future reporting and any deviations from this benchmark will be the basis for potential draw-down/clawback on collateral.
5. If less than 50% of a project's non-anchor capacity is subscribed by low-income residential customers at the end of the first contractual delivery year, the project shall have three additional months to cure the deficiency in order to avoid removal from the REC contract.

See the ~~ILSFA REC contract~~ [ILSFA REC contract](#) for more details on guidelines for establishing and maintaining subscriber shares and REC contract compliance.

## ONGOING REPORTING

After each delivery year, the Approved Vendor will be required to report subscriber information for each community solar system including subscription amounts, share by each of the subscriber types, small subscriber status, and subscription start/end dates. The IPA will evaluate the system's share of physical capacity that is subscribed by each subscriber type, as well as by small subscribers (correlating only to low-income household share).

Requirements contained in the REC contract will allow for a safe harbor of 90% total subscription levels as a percent of physical project capacity (counting the anchor tenant share and low-income residential subscriber shares) in order to avoid a collateral draw for a subscription shortfall in any delivery year following the first delivery year.

There will be a cure period after any Annual Report (starting with the report following the second contractual delivery year) if an anchor tenant was lost during the delivery year, to bring subscriber shares back in line with contract requirements (namely, low-income residential subscribers equaling at least 50% of non-anchor project capacity).

Projects will be allowed to deviate in a delivery year (starting with the second contractual delivery year) by 3 percentage points from the total contracted subscription shares of the tenant and low-income residential subscribers and avoid a collateral draw for that delivery year *only if* the project meets its contracted subscriber shares for the *following* delivery year. If the project falls short in the following delivery year, then a collateral draw would be made for each of those two delivery years.

For a LICS project that has achieved 100% low-income ownership and received the \$5/REC payment, the project will be required to certify its continuing 100% low-income ownership status on Annual Reports; failure to maintain this status will result in a pro-rata repayment obligation of the \$5/REC amount for the remaining contractual term.

### 12.3. Collateral and Performance Evaluation

Five percent collateral (as a percent of REC contract value) must be posted for a system within 30 business days of ICC approval. Collateral and performance evaluation will generally be handled at a portfolio level, i.e., pooled across all project batches and systems for a given Approved Vendor. Under-performance by any system in either REC deliveries or community solar subscriptions can trigger a collateral drawdown for a delivery year based on the difference between the allocated REC payment paid for that delivery year and the allocated payment amount that the system was entitled to for that delivery year. In any delivery year where one or more systems under the REC contract have a collateral drawdown, the Approved Vendor may elect to pay the total drawdown as cash or have the drawdown taken from posted collateral. If two forms of collateral have been posted (cash and letter(s) of credit), the Approved Vendor may choose which form of collateral shall be drawn upon.

Within 90 days of any collateral draw, the Approved Vendor will be required to post additional collateral to top up its total collateral, so that it equals five percent of its total remaining contract value (where each system's contractual value declines by 1/15 each contract year). This top up situation is the only opportunity to reduce posted collateral for a project before the project's REC contract expires, with the exception of a LICS project, for which collateral will be fully released following the tenth delivery year of the REC contract. The Approved Vendor can request the withholding of the next payment(s) due under the contract (if any) in lieu of topping up the collateral. When the last system within a batch reaches the end of its delivery term, an Approved Vendor may request a refund of the collateral associated with that batch.

Any failure to post collateral or pay for collateral drawdowns on a timely basis as required shall be an event of default under the REC contract.

If a system receives an interconnection cost estimate from the interconnecting utility prior to energization that exceeds 30 cents per watt AC (\$300 per kW AC), then within 14 days of having received that estimate, the Approved Vendor shall have the option of withdrawing that system from the REC contract and receiving a refund of 75% of its previously posted collateral associated with that system.

## 12.4 Underperformance and Surplus RECs

Starting at the end of the third full delivery year after the date of energization, a three-year rolling average of actual REC deliveries will be calculated each year, and that average performance will be deemed to be the system's performance for the recently completed delivery year.

In the case of a system's annual surplus production, the surplus RECs will be applied to the Approved Vendor's surplus REC account,<sup>21</sup> which is a single surplus REC account for all projects under the REC contract. Surplus RECs can be banked forward indefinitely, if unused, until the end of the final delivery term in the REC contract.<sup>22</sup>

In the case of a system's annual REC underperformance, first, surplus RECs from the surplus REC account, if available, shall be used to address the deficit (starting, for a delivery year, with the lowest-valued underperforming system and then moving to higher-valued systems within the contract portfolio). If surplus RECs are not available to fill in the entire underperformance across all systems in the contract for a delivery year, the underperformances shall be valued at the respective REC prices and that total shortfall amount shall be remedied through a collateral drawdown for the delivery year.

At the end of the 15-year delivery term for the last system under an Approved Vendor's REC contract, any unused balance of surplus RECs may be used to receive a refund for prior collateral drawdowns that related to REC underperformance.<sup>23</sup> The lowest-valued underdelivered RECs will first be refunded to the Approved Vendor, moving then to higher-valued underdelivered RECs, until no surplus RECs remain in the surplus REC account. If any surplus RECs remain in the surplus REC account after all prior collateral drawdowns have been refunded, no additional refund will be made for those leftover surplus RECs.

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<sup>21</sup> To be clear, surplus RECs and the Approved Vendor's surplus REC account are only a "virtual" concept used for purposes of performance evaluation and collateral issues. The actual RECs shall be delivered to the counterparty (the utility or Agency) when generated and then retired.

<sup>22</sup> Following an assignment of a batch to another contractual party where the original Approved Vendor retains other batches in its contract, the original Approved Vendor will retain any surplus RECs that had been generated by systems in the transferred batch prior to the assignment.

<sup>23</sup> This refund procedure would not apply to prior collateral drawdowns based on annual community solar subscription rates.

# 13. Invoicing and Payments

An Approved Vendor may submit an invoice for payment to the IPA or counterparty utility only for systems that have been energized and for which the Program Administrator has approved the Part II project application. For all ILSFA projects, the REC contract provides for a one-time payment for the full 15 years of REC deliveries after the conclusion of the quarterly period during which the system is energized. If the Approved Vendor has elected (for a project already energized at the time of ICC approval) for the 5% collateral under the REC contract to be withheld from the first REC payment for a system (as discussed in Section 11.1), this balance will be released at the end of the 15-year contractual period for the last system in that batch.

The formula for calculating the total REC payment of an energized system is as follows:

System (inverter) size in MW AC x approved capacity factor x 365 days/year x 24 hours/day x 15 years x 1 REC/MWh x \$/REC

However, if the nameplate capacity of the system varies at Part II submission, but is within the larger of 5 kW or 25% (e.g., system sizes that are larger or smaller than the Part I approved project application), the following exceptions occur:

## Low-Income Distributed Generation Systems

- Where the nameplate capacity submitted in Part II is larger than Part I, but within the larger of +5 kW or 25%, the contract price for purposes of payment shall be the REC price applicable to the actual nameplate capacity at the time of energization, and if such REC price is not available then the last prevailing REC price applicable to the actual nameplate capacity will be used. The quantity of RECs used for purposes of payment shall be the lesser of the REC quantities calculated based on 1) the proposed nameplate capacity and capacity factor and 2) the actual nameplate capacity and capacity factor.
- Where Part II systems are smaller in size than Part I, but within the larger of - 5 kW or 25%, the contract price for purposes of payment shall remain unchanged from the Part I price. The quantity of RECs used for purposes of payment shall be the lesser of the REC quantities calculated based on 1) the proposed nameplate capacity and capacity factor and 2) the actual nameplate capacity and capacity factor.

## Low-Income Community Solar

- Where the nameplate capacity submitted in Part II is larger than Part I, but within the larger of +/- 5 kW or 25%, and such change in nameplate capacity results in a change from a smaller size category to a larger size category applicable to the determination of REC prices, the anchor tenant contract price for purposes of payment shall be the REC price then applicable to the actual nameplate capacity under the ABP at the time of energization; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA LICs REC price. The non-anchor tenant contract price for purposes of payment shall be the ILSFA REC price applicable to the actual nameplate capacity (plus any small subscriber adders) at the time of energization.

- Where Part II systems are smaller in size than Part I, but within the larger of - 5 kW or 25%, the anchor tenant contract price for purposes of payment shall remain unchanged from the Part I price. The non-anchor tenant base price for purposes of payment shall remain unchanged, while it will also include any small subscriber adders applicable at the time of energization.
- The quantity of RECs used for purposes of the REC payment shall be based on the lesser of (i) the proposed nameplate capacity multiplied by the proposed capacity factor, and (ii) the actual nameplate capacity multiplied by the Part II capacity factor. The quantity of RECs will also be based on the percent of the actual nameplate capacity that is being subscribed by the anchor tenant and low-income subscribers combined at the time of energization; the subscription shares will be re-evaluated, with the quantity of RECs to be paid for and obligated then fixed for the life of the contract, at the end of the fourth full quarter after energization.

Invoices for payment may be submitted to the IPA or counterparty utility on a quarterly basis. To facilitate invoicing and payment, at the end of each quarterly period, the IPA and Program Administrator will prepare a quarterly netting statement for each Approved Vendor applicable to each of its REC contracts (up to four, as there are three potential counterparty utilities and the Agency), which includes payment-related information for projects that were verified as energized during the recently completed quarterly period.<sup>24</sup> The IPA, through its Program Administrator, expects to issue quarterly netting statements by the following dates: June 1, September 1, December 1, March 1.

After the receipt of a quarterly netting statement, an Approved Vendor may submit its invoice for payment to the applicable counterparty no later than the following invoice due dates: June 10, September 10, December 10, March 10.

Where a utility is the contractual counterparty, payments from the counterparty to the Approved Vendor will be made (for the Approved Vendor's first contractual payment under a contract) at the end of the month immediately following the month in which an invoice is submitted, or (for subsequent payments under a contract) at the end of the month in which an invoice is submitted, provided that the counterparty receives the invoice by the relevant due date.

Each quarterly invoice submitted to the counterparty must include the following:

- Most recent quarterly netting statement provided by the Program Administrator to the Approved Vendor;
- Invoice amount;
- Cumulative amount already received by the Approved Vendor under the REC contract;
- Maximum allowable payment, as indicated in the most recent quarterly netting statement; and
- the PJM-GATS or M-RETS Unit ID of each system included in the invoice.

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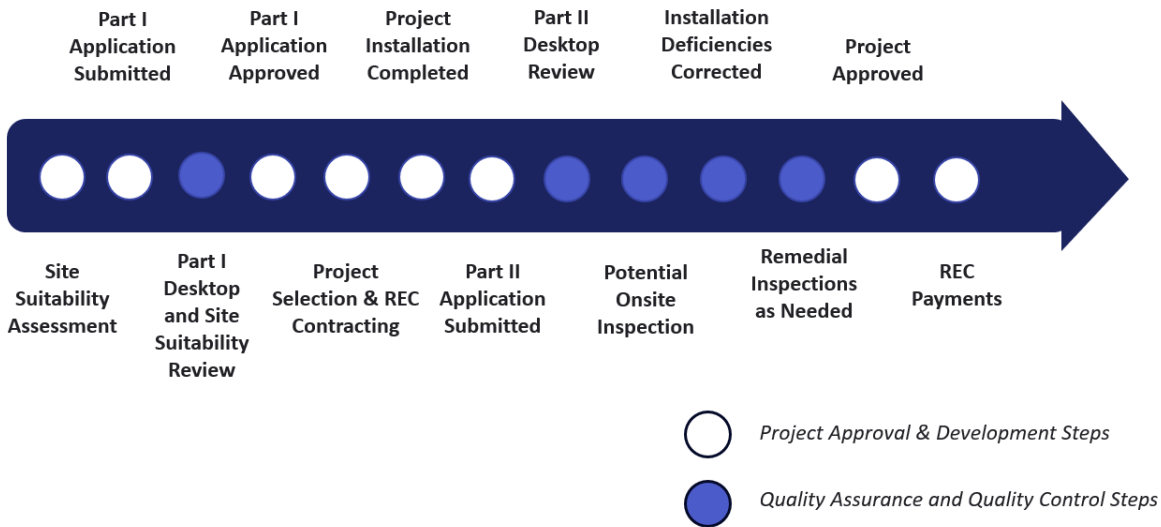
<sup>24</sup> A community solar project will also have a one-time payment adjustment at the end of the fourth full quarterly period after energization.

# 14. Inspections

## 14.1. Quality Assurance Overview

The ILSFA Program Administrator develop and has developed and implemented a process for quality assurance of project systems<sup>25</sup>, including system design review, photo documentation, and onsite inspections of a subset of installations. If installations are found to have deficiencies, the ILSFA Approved Vendor will be responsible for repairs, alterations, or additions to remedy deficiencies and cannot pass associated costs for this remediation onto participants. ILSFA Approved Vendors who persistently install deficient systems after remediation guidance may lose eligibility to continue to participate in the ILSFA program.

The following diagram illustrates how the quality assurance milestones fit into the overall project development timeline:



Part I photo review includes a review of photographs submitted with the Part I project application along with the Site Suitability Report to specifically validate the site suitability findings and compliance with the Site Suitability Guidelines. Part II photo review documents the installed system, equipment, compliance with program and local code requirements, and general quality of workmanship. Onsite inspections will validate site suitability findings as well as a more detailed inspection of system quality, safety, and performance. Remedial processes associated with inspection findings are detailed below.

If sites do not meet the requirements presented in this document and the Site Suitability Guidelines at the time of Part I project application, the Approved Vendor must provide an appropriate mitigation plan

<sup>25</sup> The Program Administrator will inspect installations, looking at electrical and structural aspects of the installation and final approvals will be made by the Authority Having Jurisdiction and interconnecting utility.

as part of the Site Suitability Report. Submitted projects that do not meet these requirements and do not provide a completed mitigation plan will not be approved. If mitigation plans do not adequately demonstrate that all site suitability requirements will be met prior to installation, the Program Administrator will work with the Approved Vendor to develop a mitigation plan on a case-by-case basis. Where Approved Vendors dispute the findings of the Program Administrator either as part of a review of mitigation plans, photo documentation, or onsite inspection, an appeal may be submitted in writing to the Program Administrator and the IPA.

## 14.2. Site Suitability

The Site Suitability Guidelines, linked below, identify site conditions that are considered barriers to the installation of both rooftop DG and ground-mounted PV systems participating in the ILSFA program. These guidelines also prescribe minimum siting requirements that must be met at Part I project approval. Improper siting on properties where roofing, electrical, structural, or other issues exist can create or exacerbate maintenance and repair issues, create unexpected maintenance or improvement costs, and impact the performance of the system, potentially causing financial or legal burdens on property owners. These guidelines address common barriers for installing solar on existing structures in four category areas: Roofing and Structural, Electrical, Space and Accessibility, and Health and Safety. Barriers in each of these categories may be found more commonly in LI communities, where housing stock may be older and deferred maintenance issues more acute. Ground-mounted siting requirements represent site assessment requirements that are industry best practices in most jurisdictions across Illinois and do not require engineering stamps prior to Part I approval.

The Site Suitability Guidelines document below describes these requirements in full and must be completed with each site assessment.

- [Site Suitability Guidelines](#)

As described in the Site Suitability Guidelines, barriers may be found, and mitigation plans developed between the Approved Vendor and site owner to correct problems and remove the barriers to solar installation. A Program Resources Guide will be maintained by the Program Administrator that catalogues a variety of resources aimed at supporting property owners with these mitigations or generally providing resources for incentives, grants, financing and details of other programs, like energy efficiency, housing, etc. Approved Vendors are required to share these resources when applicable and to support mitigation plans.

- [Program Resources Guide](#)

## 14.3. Photo Documentation

Photographic documentation will be required for all ILSFA projects. These photographs will be reviewed as part of both Part I and Part II project submission and approval. The Part I photo review focuses on site suitability and demonstrates compliance with the requirements detailed in the Site Suitability Guidelines. The Part II photo review will focus on validating any proposed mitigation plans from the Approved Vendors to comply with site suitability guidelines, as well as system design compliance, quality



of workmanship and system performance. Below are the required photos to be submitted with Part I and Part II project application.

- The assessment of photo documentation is Pass/Fail.
- All required photos must be submitted, clearly showing the requested site and installation aspects or components.
- Missing or unclear photos will need to be resubmitted.
- Any failure identified during review of photo documentation may trigger an onsite inspection. Certain failures, such as missing safety labels, may be resolved through resubmission of photo documentation.

#### PHOTO DOCUMENTATION FOR PART I PROJECT APPLICATION

SITE SUITABILITY	SHADING
<ul style="list-style-type: none"> <li>✓ Photos showing the overall roof condition</li> <li>✓ Photos of the roof components</li> <li>✓ Photos showing the condition of the electrical panel</li> <li>✓ Photos showing work areas are clear of hazardous materials</li> <li>✓ Photos showing conditions of ground mount site (ground mount only)</li> </ul>	<ul style="list-style-type: none"> <li>✓ Photos showing proposed array location</li> <li>✓ Photos showing potential obstructions</li> </ul>

Some Part II photo documentation requirements are specific to certain installation types, as indicated in the tables below.

#### ELECTRICAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

INVERTERS <sup>26</sup>	OTHER ELECTRONICS <sup>27</sup>
<ul style="list-style-type: none"> <li>✓ Inverter Information (1 Photo for each model, must show model number)</li> </ul>	<ul style="list-style-type: none"> <li>✓ Project (Photo(s) showing all installed modules)</li> <li>✓ Module information (1 Photo for each model, must show model number)</li> </ul>

<sup>26</sup> In the event of utilizing micro inverters or modules with the micro inverter pre-assembled, please capture the inverter photo during installation to avoid a potential revisit of this item during the Part II inspection.

<sup>27</sup> Please capture the photo of the modules model number during installation to avoid a potential revisit of this item during the Part II inspection.

- ✓ DC Disconnect (1 Photo must show wiring within enclosure - either within inverter or isolated)
- ✓ DC Combiner Box (1 Photo ~~if installed,~~ must show wiring within enclosure behind panel)
- ✓ AC Combiner Panel (1 Photo ~~if installed,~~ must show wiring within enclosure behind panel)

- ✓ Revenue Grade Meter (1 Photo ~~if installed,~~ must show cumulative lifetime of revenue grade meter location and generation reading)
- ✓ Battery Storage (3 Photos, ~~if installed~~)

- GENERAL ELECTRICAL (ARRAY)<sup>28</sup>**
- ✓ Grounding (1 Photo showing panel frame is grounded and bonded)
  - ✓ Exposed Wire Management (1 Photo showing proper safety labels and 1 Photo demonstrating proper wiring securing methods)

- INTERCONNECTION**
- Load-Side Connection (~~3 Photos~~)<sup>29</sup> 1 Photo of wiring connection in breaker panel ~~or~~
  - ✓ ~~Supply Side or Line-Side~~ Connection (~~2 Photos~~)<sup>30</sup> 1 Photo of wire tap or connection to switchboard
  - ✓ Main Distribution Panel (1 Photo that captures full overview)

STRUCTURAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

**ANGLED ROOF**

**FLAT ROOF**

<sup>28</sup> Please capture a photo of the modules' evidence of grounding/bonding during installation to avoid a potential revisit of this item during the Part II inspection.

<sup>29</sup> Load-Side Photos: 1) All breakers/entire panel showing required PV system labeling and ampacity, and any PV back-feed circuit breakers' position relative to the utility supply breaker or main lug, 2) general overview of connection, showing panel and conduit entering and exiting, taken approximately 6 feet back to provide general view with labeling visible, and 3) panel nameplate showing model and manufacturer information, ampacity, and type of connection (single phase, 3 phase).

<sup>30</sup> Supply Side (Line Side) connection Photos: 1) overview picture showing where the PV ties in on the supply side, and 2) detail picture showing the supply side interconnection, labeling should be visible.

~~✓~~ Mounting System Anchoring (1 ~~photo~~)  
~~✓~~ Flashing Techniques (1 Photo) showing flashing techniques

✓ Mounting System Anchoring (1 Photo showing flashing techniques, if installed)  
~~✓~~ Flashing Techniques (1 Photo if Installed)  
 ✓ Tilt angle (1 photo)

**GROUND MOUNT**

✓ Tilt angle (1 photo)

**GENERAL STRUCTURAL**

✓ Mounting System Anchoring (1 Photo showing system BEFORE panels placed)

SHADING AND MITIGATED BARRIERS PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

**SHADING**

✓ Array Clear of Obstructions (1 ~~photo~~ Photo to show array design of clear arrays matches as-built conditions)  
 ✓ Obstructed Array Sections (~~Photos as needed~~ 1 Photo to show array design of obstructed arrays matches as-built conditions)

**MITIGATED BARRIERS (IF APPLICABLE)**

✓ Photos as needed to show completion of mitigation plan

## 14.4. Onsite Inspections

Once all required Part II documentation has been received, Approved Vendors can expect to receive communication within two weeks informing them of whether they 1) have successfully passed the desktop inspection, 2) need to resubmit materials, 3) have not successfully passed the desktop inspection, and/or 4) have been selected for an onsite inspection. Questions regarding the above process can be directed towards the Program Administrator’s Approved Vendor Manager assigned to that Approved Vendor. All status updates regarding both desktop inspections and onsite inspections will be provided by the Approved Vendor to the property owner.

In addition to the mandatory desk review, a random selection of PV systems installed will be subject to an onsite inspection. The onsite inspections will be conducted by qualified Program Administrator Field Inspectors that will look at the overall quality of the system installation. During the inspection, the inspector will verify all of the material that was already checked during the desk review and also look at the system in more detail. Once the onsite inspection is completed, a final score will be determined and any material issues that may have been discovered during the inspection will have to be corrected by the contractor at the contractor’s expense before final system approval is granted. An Approved Vendor or contractor will have 20 business days (with extensions for good cause) to remedy the issues.

Projects will be selected for onsite inspections according to the following schedule (which applies to each Approved Vendor or Designee):

- 100% of projects will be assessed via Part I desktop review
- 100% of projects will be assessed via Part II desktop review
- 100% of community solar installations will be inspected onsite
- For all other project types:
  - 100% of first five installations will be inspected onsite
  - 30% of next ten installations will be inspected onsite
  - 20% of all ongoing installations will be inspected onsite
  - Remedial inspections will be conducted as needed and can impact this schedule

Onsite inspections consist of several categories of investigation undertaken by inspectors and will vary based on the installation type, including:

- Community solar or DG systems
- Systems with site suitability concerns or repairs
- Systems with battery storage
- Rooftop or ground-mounted systems
- Angled or flat roofs
- Tracking or fixed systems
- Ballasted or penetrating anchor systems

Inspectors will perform visual inspections to verify information submitted during site suitability, application, and desktop review phases, including: that installation and equipment follows designs/drawings submitted in application, compliance with electrical codes applicable to each project, ensuring roof condition and structural supports are as described and provided in designs and any calculations, and verification of REC production metering.

The tables below describe these categories of investigation for onsite inspections, as well as specific areas that will be assessed:

Inverter Inspection	Electrical Inspection	Angled Roof Inspection
String Inverter	PV Array Configuration	Ballast Mount
DC Disconnect	Grounding	Rail Mount
DC/DC Converters	Wire Management	Rail-Less Mount
PV Source Circuit Combining	Conductors	
Load Side Connection	Over Current Protection Devices	Flat Roof Inspection
Supply Side Connection	Electrical Connections	Ballast Mount
Battery Storage	Signs and Labels	Rail Mount
Rapid Shutdown Equipment	REC Production Metering	Rail-Less Mount
Module Inspection	General Structural Inspection	Ground Mount Inspection
Microinverters and ACMS	Design requirements	Ballast Mount
Load Side Interconnection	Components and equipment	Tracking Mount
Supply Side Interconnection		
Battery Storage		

The ~~Onsite Inspection Checklist~~ Onsite Inspection Checklist is the form completed by Inspectors for each inspection.

If a site has been selected for onsite inspection, the Approved Vendor representative will contact the participant/host site to determine the logistics for the onsite inspection. The Approved Vendor representative will work with both the Program Administrator and the participant to schedule an appropriate time for the onsite inspection within two weeks of notification. It is the responsibility of the Approved Vendor to secure site access and ensure that a representative is present to accompany the Field Inspector during the inspection. The Program Administrator Field Inspector will then complete the onsite inspection in accordance with the requirements checklist. Selection of a project for an onsite inspection does not necessarily mean that a site has failed the desktop inspections. Rather, in accordance with the requirements of the program, the first five projects completed by an Approved Vendor will require an onsite inspection and a percentage of subsequent projects will then be randomly selected for onsite inspections. Although property owners of course have the right to refuse an onsite inspection, they will risk having their project's ILSFA REC contract and the associated funding cancelled, per the terms and conditions of the program. All status updates regarding both desktop inspections and onsite inspections will be provided by the Approved Vendor to the property owner.

## 15. Job Training Requirements and Verification

### 15.1. Overview and Program Requirements

#### OVERVIEW

The ILSFA program requires that Approved Vendors utilize eligible trainees from approved job training programs across their portfolio of projects annually. To meet this requirement, eligible trainees will perform work on ILSFA projects at (1) a prescribed minimum percentage of total hours worked across an Approved Vendor's projects annually and (2) at a prescribed number of LIDG projects. Approved Vendors will track the work of these trainees, as well as all employees, subcontractors, Designees, and agents working on their ILSFA projects.

There are two categories of job training requirements for Approved Vendors: 1) portfolio requirements (for all ILSFA sub-programs) and 2) LIDG requirements.

#### PORTFOLIO REQUIREMENTS

The portfolio requirements prescribe that installations across an Approved Vendor's entire portfolio of ILSFA projects each year include a minimum percentage of work hours performed by eligible trainees. To ensure this minimum percentage is met, work hours for all employees, subcontractors, installers, and agents of the Approved Vendor will be collected. The required percentage of eligible trainee work hours increases annually for each of their first three years of participation as shown in the table below. This timeline for these increasing annual percentage requirements will start with the beginning of construction of the Approved Vendor's first project contracted under the Program.

**TABLE 15.1. PORTFOLIO REQUIREMENTS**

Approved Vendor Program Year	Cumulative Job Training Requirement
1	10% of all hours are performed by eligible trainees
2	20% of all hours are performed by eligible trainees
3 and beyond	33% of all hours are performed by eligible trainees

#### LOW-INCOME DISTRIBUTED GENERATION REQUIREMENTS

The LIDG requirements prescribe that 33% of all installations across an Approved Vendor’s ~~for one-~~ to four-unit and five or more-unit DG projects annually include at least one eligible trainee. Approved Vendors will track the work of these eligible trainees as well as the work of all employees working on ILSFA projects including subcontractors, Designees, and agents. See ‘Work Performance Tracking and the Role of the Job Trainee on ILSFA Projects’ within Section 15.2 for details on how to track the work. No minimum hours per project or cumulative total hours are prescribed for this requirement, only that a requisite percentage of projects utilize at least one eligible trainee. However, Approved Vendors with LIDG projects in addition to projects in other sub-programs must also fulfill the portfolio requirements described above.

#### ILLINOIS COMMERCE COMMISSION REQUIREMENTS

While ILSFA projects are exempted from the ICC requirement of using a Qualified Person for every portion of an installation, the requirement does still apply for DG projects.<sup>31</sup> This rule requires that every installation of a DG facility will be performed only by either a Qualified Person; an electrical contractor who is not a Qualified Person, provided he/she is directly supervised by a Qualified Person; or a person who is not a Qualified Person but is enrolled in a training program that, upon satisfactory completion, will meet the requirement to become a Qualified Person, provided he/she is directly supervised by a Qualified Person. The definitions of Qualified Person as it is applicable to ILSFA is further clarified in Section 15.2.

#### OTHER APPROVED VENDOR REQUIREMENTS

In addition to the minimum hours and installation percentages described above, Approved Vendors are also responsible for adhering to the following requirements:

- The Approved Vendor and/or their subcontractors/installers/agents must pay eligible trainee(s) for time spent on each project at a rate consistent with the company’s wage for employees in similar positions and at similar levels of experience.

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<sup>31</sup> See [Section 16-128A of the Public Utilities Act](#) and [83 Ill. Adm. Code 468](#) for additional details on the ICC requirement of using a Qualified Person.

- The Approved Vendor's and/or their subcontractors/installers/agents/subcontractor's/installer's/agent's insurance must cover the employment of the eligible training hires, including temporary hires.
- The Approved Vendor and/or their subcontractors/installers/agents must track the work hours of eligible ~~job~~ trainees and any other employee performing work on each ILSFA project.
- The Approved Vendor must submit the completed affidavits to the Program Administrator for each project upon Part II project approval submission. The Trainee Affidavit identifies the names of the eligible training program and trainee(s) used for each project as well as eligible trainee contact information, types of job tasks completed, hours worked and wages for the job trainee(s), and hours worked by the Approved Vendor's or their subcontractor's/installer's staff. Both the Approved Vendor and eligible trainee(s) must complete and sign this affidavit after the eligible trainee's time on the project is completed. The Project Affidavit identifies the hours worked on an ILSFA project by all employees of the Approved Vendor and/or their subcontractors/installers/agents. See the data collection requirements and affidavits in Section 15.3.
- Failure to meet the job training requirements can affect the Approved Vendor's qualified status for ILSFA. Failure to meet a single year's target will lead to a probationary status. If job training hours are met in the following year, the Approved Vendor will again be on active status. Failure to meet the job training requirements two years consecutively will mean the Approved Vendor is suspended from the program. Approved Vendors on probation can also be suspended for not meeting other program requirements. See Section 3 for more information about disciplinary actions and processes.
- Approved Vendors can apply for a Job Training Requirements waiver for individual projects. The waiver is limited in scope and must demonstrate a good faith effort to meet the requirements. If approved, the hours for the waived project will not count towards cumulative annual goals. See the waiver description in Section 15.4.

#### APPROVED VENDOR ANNUAL REQUIREMENTS CALENDAR

The date that is considered the beginning of the Approved Vendor's first year, in which the Approved Vendor must start meeting job training requirements is the date of the beginning of construction of the Approved Vendor's first project contracted under the Program. If project development occurs over multiple years, the work hours for that project will be included in the year the construction began. This is especially important for large DG projects and community solar projects, where development timelines can extend beyond a year. For example, if a project's contract date was January 15, 2019, and completed in September of 2021, the hours will count towards the Approved Vendor's first year and the Approved Vendor will be required to meet the 10% portfolio requirement, not 20%.

All Single Project Approved Vendor projects must meet the job training requirement of 10% of all hours being performed by eligible trainees.

## 15.2. Defining Qualified Trainees and Qualified Job Training Programs

### QUALIFIED JOB TRAINING PROGRAMS

Eligible trainees come from one of two types of Qualified Job Training Programs: FEJA Workforce Development Programs, including the FEJA-funded Solar Contractor Accelerator Program, or OQPs. FEJA Workforce Development Programs include those programs described in Section 16-108.12 of the Public Utilities Act and approved in ICC Docket No. 17-0332 and OQPs include those programs described in 83 Ill. Adm. Code 468.20. See the ILSFA website at [www.IllinoisSFA.com/job-training/](http://www.IllinoisSFA.com/job-training/) for more details of current active Qualified Job Training Programs along with other job training and workforce development resources.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the eligible trainee on an individual basis. When using eligible trainees from an OQP, the Approved Vendor is required to provide documentation demonstrating that it first attempted to hire someone from the FEJA Workforce Development Programs. Please see the [Project Waiver Evaluation Rubric](#) for guidance.

### FEJA WORKFORCE DEVELOPMENT PROGRAMS

These include three categories of programs funded by the Act, including:

- **The Solar Training Pipeline Program:** This program provides installer training in underserved communities; solar installer training for returning citizens, foster care alumni, and veterans; and the Solar Contractor Accelerator for women-/minority-/veteran-owned businesses.
- **The Craft Apprenticeship Program:** This program provides apprenticeship training at 17 sites across the state, solar training at six community colleges across the state, and provides high school solar pre-apprenticeship programs at high schools in underserved Illinois communities.
- **The Multi-Cultural Jobs Programs:** These are workforce development programs integrated into initiatives around economic development, economic independence, youth leadership, OSHA and environmental certification for construction trades, and various utility industry trade skills.

### OTHER QUALIFYING PROGRAMS

ILSFA Approved Vendors may also request to use eligible trainees from an Other Qualifying Program (OQP), so long as they can demonstrate that completion of the job training program would lead to the eligible trainee becoming a Qualified Person under the Ill. Adm. Code 468.20 related to the certification of installers of photovoltaic systems.

Code Part 468.20 provides that Qualified Person status may be conferred upon individuals who have successfully completed at least one of the following programs requiring lab or field work:

- An apprenticeship as a journeyman electrician from a DOL registered electrical apprenticeship and training program;
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program;



- An Underwriters Laboratories (UL) distributed generation technology certification program;
- An Electronics Technicians Association (ETA) distributed generation technology certification program; or
- An associate in applied science degree from an Illinois Community College Board approved community college program in the appropriate distributed generation technology.

To become a Qualified Job Trainee for an ILSFA project from an OQP, an eligible trainee will have completed 50% or more of the classroom requirements for one of the training categories listed above. The application to become an OQP will request information such as detailed curriculum and official program accreditation documents.

## QUALIFIED JOB TRAINEE

To become a Qualified Job Trainee, individuals will have completed 1) a qualified, FEJA Workforce Development Program in one of the three categories (the Solar Training Pipeline Program, the Craft Apprenticeship Program or the Multi-Cultural Jobs Program) within the past 36 months, or 2) 50% or more of the classroom requirements of an OQP within the past 24 months. For FEJA Workforce Development Programs that graduated trainees in 2018 or early 2019 (prior to the formal launch of ILSFA), such trainees will be eligible for 36-months beginning at program launch rather than their graduation date.

Additionally, a Qualified Job Trainee may come from a contractor/organization that is participating in the FEJA-funded Solar Contractor Accelerator Program. This training program is intended to help develop a diverse, inclusive, quality energy contracting community, specifically targeted to help minority-/women-/disadvantaged-/veteran-owned contracting businesses seeking to expand into the solar marketplace.

Contractor organizations participating in FEJA Workforce Development Programs will have the option to designate up to two individuals from their organization as eligible trainees. Each of these individuals must have participated in 50% of the foundational components of the FEJA training with which the organization participated. Foundational components are the sessions with content shared across all contractor organizations in the program, versus consulting and coaching specific to the contractor, and general sessions open to non-program participants. Designated Trainees will be identified on a trainee designation form, signed by the contractor and a representative from the FEJA Workforce Development Program.

Contractors who have already begun training in a FEJA Workforce Development Program prior to ILSFA program launch will be able to retroactively submit for two designated trainees. The Program Administrator will coordinate with FEJA Workforce Development Programs that have been providing training to contractors to set an agreeable plan and deadline for submission of Designated Trainees. These retroactive Designated Trainees will be added to the eligible trainee list in the ILSFA database (as will be the case with new Designated Trainees identified after program launch). Designated Trainees may be referred to Approved Vendors and their contractors in the same way that individuals receiving FEJA training can be referred when Approved Vendors and their contractors do outreach for eligible trainees for ILSFA projects.

The Program Administrator will work with FEJA Workforce Development Programs to create opportunities for Approved Vendors to connect with and learn about contractors engaged in FEJA training.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the Qualified Job Trainee on an individual basis. When using Qualified Job Trainees from an OQP, the Approved Vendor is required to provide documentation demonstrating that it first attempted to hire someone from the FEJA Workforce Development Programs before hiring someone from an OQP.

## WORK PERFORMANCE TRACKING AND THE ROLE OF THE JOB TRAINEE ON ILSFA PROJECTS

The Qualified Job Trainee(s) may participate in ILSFA projects in a direct or support role in the categories of System Design, Installation, System Commissioning, and Operations/Maintenance, as categorized by NABCEP, or the category of Technical Sales/Other, as described below. The work assigned to trainees must require job task categories from one of the NABCEP PV certifications. The work of the trainee(s) can be on or off the project site but must be specific to the ILSFA project.

Below is a chart providing examples of activities related to each job task category.

**TABLE 15.2. ACTIVITIES BY JOB TASK CATEGORY**

<b>System Design</b>	<b>Installation</b>	<b>System Commissioning</b>
<ul style="list-style-type: none"> <li>• Site assessment</li> <li>• Shading analysis</li> <li>• Electrical design</li> <li>• Mechanical design</li> <li>• Engineering</li> <li>• Procurement</li> <li>• Permitting</li> <li>• Zoning</li> </ul>	<ul style="list-style-type: none"> <li>• Install electrical</li> <li>• Roofing</li> <li>• Structural</li> <li>• Racking</li> <li>• Modules</li> <li>• Carpentry</li> <li>• Fencing</li> <li>• Health and safety</li> <li>• Battery</li> <li>• Monitoring controls</li> <li>• Foundation</li> </ul>	<ul style="list-style-type: none"> <li>• Interconnection</li> <li>• Visual and mechanical inspection</li> <li>• Component testing</li> <li>• Electrical testing</li> <li>• System monitoring</li> <li>• User training</li> <li>• Utility commissioning</li> </ul>
<b>Operations/Maintenance</b>	<b>Technical Sales/Other</b>	
<ul style="list-style-type: none"> <li>• Preventative maintenance</li> <li>• Corrective maintenance</li> <li>• System monitoring</li> <li>• Component testing</li> <li>• Component replacement</li> </ul>	<ul style="list-style-type: none"> <li>• Sales</li> <li>• Customer service</li> <li>• Subscriber management</li> <li>• Financial modeling</li> </ul>	

## 15.3. Data Collection

### THE AFFIDAVIT PROCESS

The [ILSFA Job Training Project Summary Affidavit](#) and the ~~ILSFA~~ [ILSFA Qualified Job Trainee Affidavit \(Trainee Affidavit\)](#) documents must be completed for each ILSFA project. The affidavits include information about all employees working on ILSFA projects, the categories of work performed, and the number of hours for each. The affidavits will also include information on the qualifying job training program for each Qualified Job Trainee. Documentation of hours and salary supporting information recorded on the affidavits shall be accessible to the Program Administrator upon request for up to four years after the submission of the affidavits.

### APPROVED VENDOR ANNUAL TRACKING

Hours must be documented for all employees from Approved Vendor or subcontractors/installers/agents that work on ILSFA projects in each of the five work performance categories detailed above. All hours documented for each ILSFA project will be assigned to individual employees, with each employee designated as a Qualified Job Trainee or a non-trainee.

Hours associated with siting, marketing, site acquisition, and other pre-development tasks not associated with specific projects will not be included in these calculations. The hours associated with work performance categories counted in the numerator should also be the categories counted in the denominator.

### CALCULATING ANNUAL PORTFOLIO REQUIREMENTS

To calculate the percentages, with X as the numerator and Y as the denominator:

- Y will represent total employee hours contributing to the development of the ILSFA project(s) being assessed across the five work performance categories defined above.
  - Hours will include all employees contributing to the ILSFA project(s) across these categories, whether onsite or offsite, and across the Approved Vendor's and subcontractor's/installer's staff as long as they performed work in one of the five categories.
- X will equal those hours calculated in Y that are assigned to Qualified Job Trainees.

The calculation of X/Y will provide the percentage for each ILSFA project.

### CALCULATING ANNUAL LOW-INCOME DISTRIBUTED GENERATION REQUIREMENTS

To calculate the number of projects with Z as the numerator:

- Z will represent the total number of LIDG projects submitted by the Approved Vendor in one program year

The calculation of  $0.33 \times Z$  (rounded up to the nearest whole number) will provide the number of projects that have to utilize at least one Qualified Job Trainee. There are no minimum hour requirements for Qualified Job Trainee hours on individual projects. However, the Program Administrator will monitor the average hours assigned to Qualified Job Trainees for individual

projects to ensure trainees are contributing to project development in meaningful ways and not simply to meet program requirements.

## APPROVED VENDOR PORTAL AND REPORTING DASHBOARDS

Data is collected via the affidavit form and submitted online through the ILSFA Approved Vendor Portal.

## 15.4. Waiver Process

### WHEN TO APPLY FOR A JOB TRAINING WAIVER

Waivers can be submitted at the project level where good faith efforts have been made to meet job training requirements but were unsuccessful. Waivers will be assessed based on the criteria defined below. If a waiver is approved, the project waived will not be included in annual calculations and not counted towards annual goals – whether portfolio-wide requirements or LIDG project requirements.

Approved Vendors are encouraged to bring job training compliance issues to the Program Administrator early in the development process. The Program Administrator will make every effort to provide resources, contacts, and guidance on locating and hiring Qualified Job Trainees. Details on every qualified, FEJA-funded job training program can be found on the [ILSFA website](#). The Program Administrator can direct the Approved Vendor and/or their subcontractor/installer/agent to resources, contacts, hiring events, and more. The Approved Vendor is expected to proactively seek help early. Please see the [Project Waiver Evaluation Rubric](#) for guidance.

### WAIVER APPLICATIONS AND GOOD FAITH EFFORTS

The [ILSFA Project Waiver for Job Training Requirements](#) (Project Waiver) is represented as a series of questions; the answers may demonstrate a good faith effort on the part of the Approved Vendor and/or their subcontractor/installer/agent to meet the job training requirements. Waivers will be considered on a case-by-case basis. Each Project Waiver application will come to a determination of pass or fail based on these responses and associated documentation.

- General Efforts:
  - Did you have ILSFA Qualified Job Trainees currently on staff?
  - Were Qualified Job Trainees employees of your firm previously (but not currently)?
  - Do you have subcontractors/installers you have worked with in this performance year who currently have Qualified Job Trainees on staff?
  - Have you interviewed Qualified Job Trainees for positions at your firm?
  - Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Qualified Job Trainees?
  - Did you include the ILSFA goal in your subcontract agreements?
- Outreach Efforts:
  - Did you contact Qualified Training Programs directly to seek eligible ILSFA trainees for hire by email, mail, and phone? Did you follow up on your request if there was no response to the first inquiry?

- Were efforts made to seek out Other Qualifying Training programs for Qualified Job Trainee availability?
  - Which community organizations and other channels did you contact to solicit Qualified Job Trainees to fill training positions?
  - Did you invite subcontractors/installers with Qualified Job Trainees to bid for this project?
  - Did you contact employees to gain referrals of Other Qualifying Training Programs?
  - Were efforts made to seek out Other Qualifying Training programs for Qualified Job Trainee availability? Did you advertise ILSFA Qualified Job Trainee employment opportunities in outlets known to be accessible to Qualified Job Trainees?
  - Did you provide a clear explanation of the work opportunity to attract Qualified Job Trainees?
- Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Qualified Job Trainees?

Within the Project Waiver, the good faith effort explanation must include all supporting documentation, including emails, contact numbers, timelines, dates, and any other relevant information. Missing or incomplete information is not considered. [Please see the Project Waiver Evaluation Rubric](#) for guidance.

## 15.5. Job Training Requirements Compliance Assessment

### VALIDATION

To ensure Approved Vendors are complying with the job training requirements of the ILSFA program, the Program Administrator will conduct randomized validation checks with registered job trainees and/or job training program providers/facilitators to verify data provided by the Approved Vendors. Twenty percent of the Approved Vendor projects will be randomly selected for verification on a recurring basis. Approved Vendors who are found to have missing or insufficient information for a given project will be notified of their non-compliance and be given the opportunity to make corrections and/or supplement that information. If the Program Administrator determines a project cannot be brought to compliance after a reasonable effort to do so, the following remediation will apply.

### REMEDIATION

For projects failing to meet the informational requirements set forward in these requirements, eligible trainee hours will not count towards annual goal requirements. If it is determined that an Approved Vendor has provided false or misleading information on a project, eligible trainee hours will not count towards annual goal requirements and the Approved Vendor will be placed on a probationary status, as detailed in Section 3 of this manual.

Multiple instances of an Approved Vendor providing false or misleading information in one sampling, or the discovery of subsequent infractions while an Approved Vendor is on probationary status, may lead to suspension from the program.

## 15.6 Job Training Resources and Tools

### WORKFORCE DEVELOPMENT RESOURCES

To achieve successful results within the Workforce Development framework of the ILSFA program, Approved Vendors should be aware of locations where they can recruit eligible trainees and be able to identify the type of tasks appropriate for eligible trainees. They should be knowledgeable of Title 83, Part 46 of the Illinois Administrative Code where “Qualified Person” is defined to best assist them in finding OQPs when needed. Additionally, Approved Vendors/contractors should become familiar with best practices in creating quality work-based learning experiences.

- Learn about FEJA Training Programs by reviewing the ILSFA Job Training webpage: [www.IllinoisSFA.com/Job-Training/](http://www.IllinoisSFA.com/Job-Training/).
  - This page will contain updated lists of FEJA Workforce Development Programs and OQPs as they are approved.
- Learn the type of work tasks that count towards an eligible trainee’s hours on ILSFA sites.
  - The training and work experience Approved Vendors and their contractors provide to eligible trainees are required to line up with NABCEP PV Job Task Categories. This is meant to ensure that the ILSFA program is providing experiences and skill development specific to the industry as the Program seeks to develop a robust and qualified solar workforce through its projects. Vendors can learn more details about the NABCEP Job Task Categories on the NABCEP website where NABCEP certifications are broken down by these specific categories and related tasks.
- Visit the [NABCEP website](#).
  - NABCEP PV Certification Job Task Analysis (JTAs)
    - [Photovoltaic Specialists Job Tasks Analysis](#) (Photovoltaic Design, Photovoltaic Installer, Photovoltaic Commissioning and Maintenance)
    - [PV Installation Professional Job Task Analysis](#)
    - [PV Technical Sales Job Task Analysis](#)
    - [PV System Inspector Job Task Analysis](#)
- Learn about Part 46 and the definition of a Qualified Person.
  - Approved Vendors will need to know what a qualified person is, per Title 83, [Part 468](#) of the Administrative Code, in order to find a partner who administers programs that leads to trainees meeting the criteria of a Qualified Person.
- Establish best practices that create quality work-based learning opportunities for trainees. Incorporate that offering into the overall recruitment strategy for not only fulfilling the job training requirement of ILSFA, but ideally also as a feature of overall business development.
  - The ILSFA job training requirement fits into a larger strategy of meeting the goal of building a strong solar workforce while also connecting talented individuals from disadvantaged communities to career pathways. The [Strategies for Solar Workforce Development Toolkit](#) (created by the Solar Foundation under Solar Training Network funding from the US Department of Energy) offers tools and considerations Approved Vendors and contractors can consider as they incorporate recruitment and engagement of trainees into their business.

## PROGRAM ADMINISTRATOR SUPPORT

The IPA and Program Administrator realize the potential barriers for Approved Vendors in finding ILSFA Qualified Job Trainees for their projects (as well as the challenge trainees may face in finding opportunities) and will do their best to facilitate the connection of Approved Vendors to ILSFA Qualified Job Trainees.

Two key ILSFA Program Administrator staff members will be designated resources for Approved Vendors to ensure their understanding and fulfillment of the ILSFA job training requirements: the Approved Vendor's assigned Vendor Manager and the Workforce Program Manager.

All Approved Vendors will be assigned a Vendor Manager. All Vendor Managers for ILSFA will work in coordination with the Workforce Program Manager. The Workforce Program Manager will work closely with FEJA Workforce Development Programs and OQPs as they are documented and approved.

During regularly scheduled meetings, the Vendor Manager will provide orientation on and support in meeting ILSFA program requirements, including the job training requirements, and address questions and concerns as they come up. Although locating eligible trainees is the ultimate responsibility of the Approved Vendor and their contractors, the administration team will provide training program information and liaise between training programs and Approved Vendors to facilitate quality connection pathways for trainee recruitment. The administrative team is invested in seeing Approved Vendors be successful within the program and meet all requirements and will update resources and materials to incorporate feedback, other program changes, or provide clarifications as needed.

## 16. Complaint Management

As mentioned in the consumer protection guidelines for ILSFA projects, LI communities have often been targeted with false or deceptive marketing practices, predatory sales, unfair contracts, and poor-quality workmanship. These guidelines require that the information shared with participants is clear and accurate to ensure a transparent and positive experience for participants and to mitigate these risks. However, in the event participants have complaints, the Program Administrator recommends that participants first try to resolve the problem with the installer or Approved Vendor. Examples of possible complaints may be related to the contract, installation and maintenance, warranty, billing, or customer service. If the issue cannot be resolved, the participant may contact the ILSFA Program Administrator by emailing [info@IllinoisSFA.com](mailto:info@IllinoisSFA.com) or by calling 1-888-970-ISFA (4732). Approved Vendors shall notify their Vendor Manager of any unresolved complaints.

The Consumer Protection Guidelines for Low-Income Distributed Generation can be found [here](#).

The Consumer Protection Guidelines for Low-Income Community Solar can be found [here](#).

Additionally, as made clear in the ILSFA Standard Disclosure Forms provided to the participant, the participant may also file a complaint regarding fraudulent or deceptive sales practices. The Consumer Protection Division of the Illinois Attorney General's office may be able to help. Participants may contact the Illinois Attorney General's office by calling one of the following hotlines:

**Chicago**

800-386-5438

TTY: 800-964-3013

**Springfield**

800-243-0618

TTY: 877-844-5461

**Carbondale**

800-243-0607

TTY: 877-675-9339

## 16.1. Complaint Management Requirements

The Program Administrator expects that Approved Vendors provide exemplary customer service and be responsive by quickly working to resolve issues. In addition to providing excellent customer service, being informed of all ILSFA requirements and adhering to the Marketing and Consumer Protection Requirements outlined in Section 7 of this manual can greatly reduce the number of participant complaints. ILSFA Approved Vendors are expected to work with the customers, prospective customers, and grassroots education organizations in a responsive, forthright, and constructive manner. All Approved Vendors, Designees, and subcontractors are expected to conduct any and all business affiliated with the ILSFA program in a responsible manner that fosters integrity and public confidence, including responding to all public inquiries within five business days. Potential participants who are judged to be non-eligible, already enrolled, or otherwise without next steps should be notified as such within 5 business days.

Approved Vendors are expected to adhere to the information they shared with the Program Administrator and grassroots education organizations indicating what subscribers will be accepted for community solar projects and what standardized offers are available for distributed generation projects. Approved Vendors that are uncertain of what they can offer should specify this. Approved Vendors should promptly notify the Program Administrator if they expect delays or other capacity limits that will affect the project information previously shared with the Program Administrator. As agreed upon when becoming an Approved Vendor, information on any complaints and incidents will be provided to the Program Administrator as it becomes available. This information should include details about the complaint and participant contact information.

Approved Vendors will also provide a weekly complaint status report for all unresolved or open complaints to their Vendor Manager. This will include details on participant complaints and whether they have been resolved or are still in progress. Resolution details shall be included if the complaint has been resolved.

The Approved Vendor will provide a summary of participant complaints received and resolution details in the annual report. This data will be used by the Program Administrator to consider the ongoing eligibility of an Approved Vendor to continue participation in the program.

If participant complaints come directly to the Program Administrator, the Vendor Manager will contact the Approved Manager to discuss appropriate resolution.



As detailed in Section 6.13.3 of the Revised Plan<sup>32</sup>, the Agency maintains a [public database of consumer complaints](#) for the ABP and provides an annual written report to the ICC documenting the frequency and nature of complaints, and any enforcement actions taken. The first such report, covering calendar year 2019, was filed on March 2, 2020 and can be found at the bottom of the public database of consumer complaints webpage linked above. A similar database for ILSFA will be developed.

## 16.2. Complaint Management Best Practices

The following are best practices to ensure quick resolution and participant satisfaction.

Within 24 hours of receiving a complaint, Approved Vendors should follow up with the participant via phone call or email to confirm complaint details and inform the participant that their issue is currently being investigated. Approved Vendors should provide participants with a timeline of when they can expect a response, generally three to five days, and whether the complaint has been resolved or the complaint is still being investigated. The goal is to resolve complaints within two weeks.

It is best practice to contact the participant at least once a week to update them on the progress of their complaint, especially in cases where it cannot be resolved within two weeks.

Approved Vendors should maintain documentation of the interactions related to the resolution of complaints. This information is required for the annual report or if a complaint becomes escalated.

Complaints can often arise from participant confusion or not having a full understanding of the process and the system. Since participants may have very little to no understanding of the concept of solar systems, it is recommended that Approved Vendors be proactive in the way they interact and communicate with them. Approved Vendors should avoid using technical jargon when possible and use examples when describing difficult concepts. Additionally, it may be useful to provide participants with guides such as basics of solar panels, system maintenance, net metering, and billing FAQs to head off future complaints.

## 16.3. Reporting Incidents

Any of the incidents specified in Table 16.1 below must be immediately reported in accordance with the procedures contained in this document. Notwithstanding reporting requirements, the Program Administrator's top priority is the health and safety of everyone; therefore, adherence to any procedure or reporting requirement should never override the safety, health, or well-being of anyone. If an Approved Vendor is involved in a reportable incident but cannot safely report it immediately, Approved Vendors should follow the applicable reporting protocol as soon as they are safely able to do so. When

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<sup>34</sup> Section 6.13.3 applies specifically to the Adjustable Block Program, but Section 8.2.1 of the Revised Plan makes clear that the general terms and conditions of the Revised Plan's Chapter 6 will apply to ILSFA unless otherwise specified.

Approved Vendors are unsure of whether to report an incident, they should err on the side of caution and report it.

**TABLE 16.1. INCIDENT TYPE AND REPORTING TIMEFRAMES**

Incident Type	Reporting Timeframe
Any workplace incident that results in an injury, illness, or a threat to anyone’s health or safety	N/A
Violation of formal ILSFA requirements	3 hours (verbally) 24 hours (written)
Near miss or incidents involving damage to private or public property caused by Approved Vendors or their subcontractors/installers, including any reports of damage reported to Approved Vendor (no injury to anyone)	24 hours
Loss or theft of personal electronic device (laptop, smartphone, tablet, etc.) containing client’s confidential information	3 hours (verbally) 24 hours (written)
Breach of participant’s confidential information	3 hours (verbally) 24 hours (written)
Condition that draws, or may draw, negative media attention	3 hours (verbally) 24 hours (written)

**REPORTING PROCEDURE FOR SAFETY INCIDENTS**

1. When involved in a safety incident, get to a safe place as quickly and carefully as you are able.
2. If emergency assistance is needed, call 911 as soon as you are able to safely do so.
3. Once safe and emergency assistance has been called, medical care sought, or other help sought as needed, contact your Vendor Manager. If possible, have the following information available when you call:
  - a. Address of where safety incident occurred
  - b. Names of those involved
  - c. What happened (factual summary of incident including injuries and/or property damaged or destroyed)
  - d. Response
  - e. Current status of incident

## REPORTING PROCEDURE FOR STOLEN OR LOST PERSONAL ELECTRONIC DEVICE (PED) OR BREACH OF CONFIDENTIAL INFORMATION

1. If a PED is stolen or you become aware of a breach of confidential information, immediately contact your Vendor Manager. Be prepared to report the following information to the extent you have it:
  - a. Type of device stolen
  - b. Brief summary of circumstances of theft or loss (location, time, etc.)
  - c. Type of confidential information on the PED or accessible via the PED
2. If a PED is stolen, contact the police for the jurisdiction where the PED was stolen and complete a stolen property report.

## REPORTING PROCEDURE FOR NEGATIVE MEDIA ATTENTION (ACTUAL OR POTENTIAL)

1. If you become aware of any condition that draws, or may draw, negative media attention, immediately contact your Vendor Manager.
2. Be prepared to report:
  - a. The name of the media outlet, the date, the time of broadcast, and the names of any writers, reporters, or news anchors; or
  - b. Provide a copy of the link or otherwise describe what is at issue.

# 17. Confidentiality

The IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in the ILSFA program. This includes the assertion of FOIA exemptions for commercially sensitive information or for personally identifying information when applicable in response to a FOIA request and to otherwise protect the confidentiality of commercially sensitive information in response to any discovery request or other request made in connection with formal investigation or litigation. Where appropriate, Approved Vendors should designate any particularly sensitive information as confidential or proprietary to maximize the likelihood that such information would be protected from disclosure by a reviewing body (such as a reviewing court or the state's Public Access Counselor) in response to an appeal of the Agency's determination that such information should not be disclosed in response to a FOIA request.

Except where otherwise provided (such as with certain project-specific information being made publicly available through publishing project selection results<sup>33</sup>), Approved Vendor submittals, including

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35 As of the time of this publishing, given the demonstrated public interest in learning about photovoltaic projects that have applied to or been approved through the program (including where such projects are located, project size, etc.), the IPA is exploring what specific project information should be made publicly available through the ILSFA website. Upon finalization and release, those project information release protocols will govern the Agency's release of project information, and the Vendor Manual will be updated to reflect those new protocols.

quarterly netting statements, annual reports, Approved Vendor applications, and project applications, will not be publicly posted or made publicly available as a matter of course, provided that nothing included herein shall a) prohibit the IPA from reporting information taken from Approved Vendor submittals to appropriate authorities should the IPA have reasonable suspicion of any fraudulent or otherwise illegal behavior, b) prevent the IPA from making aggregated information taken from across Approved Vendor submittals publicly available, or c) prevent the IPA from sharing information received with the ICC or public utilities to support the Program's operation.

## 18. Vendor Manual Updates

Information in this manual is subject to change without prior notice. To obtain the latest version of this manual, visit the For Vendors page of the ILSFA website at [IllinoisSFA.com/for-vendors/](https://IllinoisSFA.com/for-vendors/).

The manual will be updated both as the program changes and as additional questions and issues arise. Updates to the manual will be made by the IPA in consultation with the Program Administrator. Such changes will be announced on the ILSFA website at [IllinoisSFA.com/announcements/](https://IllinoisSFA.com/announcements/); the version of the manual published through the website will always be the latest version.

Changes to manual versions will be red-lined and indicated by alternate version numbering. A summary of changes will be provided in the appendix with any subsequent version as well.

## 19. Appendix

### 19.1 Approved Vendor Manual Updates

#### 202~~0~~1 SIGNIFICANT REVISIONS :

- Section 2: Removed sub-program budget information throughout section.
- Section 3.3: Added information about Approved Vendor registration and language about re-certification for consistency with ABP Guidebook.
- Section 3.7: Created new section about changes to Approved Vendors and projects for consistency with ABP Guidebook.
- Section 4.1: Clarified long-term residency requirement for LIDG projects and added information about LIDG Referral Process.
- Section 4.3 Added notice about confidential treatment of subscriber information for LICS projects for consistency with ABP Guidebook.
- Section 5.5: Updated requirement for determining energy rate.
- Section 6, 6.1, 6.3: Updated income verification section throughout, including notice about redacting PII.
- Section 8.2: Updated disclosure links and disclosure collection/submission instructions.
- Section 8.3: Added language about batching for Approved Vendors without previously submitted projects.

- Section 8.4: Added specific instructions for what to include and not to include for Part I Project Approval, as well as instructions for files naming conventions.
- Section 8.: Updated Part II Project Approval instructions.
- Section 9 Project Selection: Updated program year references and links throughout Project Selection section.
- Section 10.3: Created new section to detail requirements when using Previously Used Equipment.
- Section 10.4: Updated System Location information.
- Section 10.8: Added language about timing and process of co-located projects for consistency with ABP Guidebook.
- Section 10.12: Add language about restricting standard capacity factor.
- Section 10.14: Updated System with Battery Back-Up information.
- Section 14.3: Updated Photo Documentation instructions.
- Section 16.1: Added text to Complaint Management Requirements to address customer concerns/unresponsiveness.