

Request for Comments: Home Repairs and Upgrades Initiative

07.10.2024

The Illinois Solar for All (“ILSFA”) Program Administrator and the Illinois Power Agency (the “Agency” or “IPA”) are requesting feedback from stakeholders and other interested parties on the Home Repairs and Upgrades Initiative (“Initiative”) Program Year 6 (2023-2024) Report and recommended updates for Program Year 7 (2024-2025).

Background

The Home Repairs and Upgrades Initiative was launched in July 2023 to address the barrier of needed home repairs for solar installation in some owner-occupied income-eligible households that are otherwise qualified for ILSFA. The goal is to increase participation in the Illinois Solar for All: Residential Solar (Small) sub-program, but the Initiative was also designed to gather data and information from Approved Vendors and homeowners on the frequency and extent of needed home repairs within the ILSFA program.

The Home Repairs and Upgrades Initiative was implemented in Program Year 6. Owner-occupied homes that are otherwise qualified for ILSFA were eligible to participate in this Initiative, and the Initiative’s repairs and upgrades incentives were limited to electrical work and roof repairs (including permit fees for allowable repairs) necessary for the solar installation. The Program Administrator worked directly with Approved Vendors and homeowners to gather data and information on the frequency and extent of needed home repairs within ILSFA. In addition, the Program Administrator conducted research and outreach into external funding opportunities for homeowners and compiled this into an [External Funding List](#), which is available for homeowners.

Following the end of Program Year 6, the Program Administrator published an evaluation report with Key Findings from the Initiative's first year and Recommendations for Program Year 7.

The IPA and the Program Administrator (the “Program Team”) are seeking feedback on the specific recommendations and questions below. Commenters are not required to respond to every question and may

provide feedback on other elements of the Initiative. Comments are welcome from both stakeholders in ILSFA and other interested parties.

Please note that comments will be made public and published on the ILSFA website (IllinoisSFA.com). However, if a commenter seeks to designate any portion of its response as confidential, that commenter must provide both a non-public confidential version and a public redacted version. Independent of that designation, if the Program Team determines that a response contains confidential information that should not be disclosed, it reserves the right to add its own redactions to the public version.

The Home Repairs and Upgrades Initiative Final Report is posted at IllinoisSFA.com/Announcements.

Responses are due by **Wednesday, July 24, 2024, at 5 p.m. CT**, and should be sent to the Program Administrator at Comments@IllinoisSFA.com.

Recommendations for Stakeholder Feedback

1. The Program Administrator recommends eliminating the need for written communications from prospective participants regarding requests for external funding.

The Program Administrator regularly monitors available programs in the state and communicates these options to prospective participants seeking home repair assistance from available third-party funding sources. From this past Program Year, the Program Administrator has found that the probability of receiving funding from an external home repair program within a few months is low, as many programs have extensive waitlists of six-plus months and/or have long administrative processes for onboarding. Thus, the Program Administrator aims to reduce the burden on ILSFA prospective participants by eliminating the need to show proof of requests for external funding in cases where there are no active and available programs near a prospective participant. A good-faith effort to exhaust external funding options will still occur, supported and coordinated by Program Administrator staff, before the Initiative approves repairs and/or upgrades through ILSFA incentives to a participating Approved Vendor. The Program Administrator will continue to update and maintain the External Funding List for prospective participants as it becomes aware of changes to third-party program availability.

In instances where the Program Administrator believes that securing outside funding is achievable, the Program Administrator will give the prospective participant the option to reach out to external programs or will offer to reach out on their behalf. If participants communicate directly with external home repair programs, the Program Administrator will request any written communication, if available, reflecting the request for external funding. If the Program Administrator communicates with external home repair programs, it will keep track of all communications, both written and verbal.

2. The Program Administrator recommends adding tree alteration to the list of eligible repairs and upgrades available in the Home Repairs and Upgrades Initiative.

The Program Administrator proposes the inclusion of tree alteration as eligible within the Initiative, recognizing it as a barrier to solar installation for some homeowners. By adding tree alteration, particularly tree removal and

tree trimming, to the list of eligible repairs and upgrades, these participants can continue to adhere to the no upfront cost requirement while accessing the benefits available through ILSFA.

In one-on-one discussions with Approved Vendors, some have highlighted tree alteration, especially tree removal and tree trimming, as a significant obstacle to solar installation, leading customers to contemplate out-of-pocket expenses to overcome this barrier to participate in ILSFA.

The Program Administrator recommends including the item “Tree Removal or Tree Trimming” on the list of repairs and upgrades available within the Initiative, with a cost cap of up to \$4,000. Given that typically one to two trees need maintenance to proceed with solar installation, and tree removal averages anywhere between \$200 and \$2,000 per tree¹, the Program Administrator recommends tree alteration up to \$4,000 and a maximum cost cap for Required Permit Fees at \$150.

TREE ALTERATION :

Item or Fee	Maximum Cost per Unit	Maximum Cost
Required Permit Fee	--	\$150
Tree Removal or Tree Trimming	--	Up to \$4,000 ²

3. The Program Administrator recommends increasing the cost caps for the roof and electrical repairs and upgrades available within the Initiative.

The Program Administrator proposes an adjustment to the cost caps for electrical repairs, recommending an increase from \$4,000 to \$6,550. Specifically, the proposal includes raising the cost cap for the Required Permit Fee(s) from \$100 to \$150, the Main Service Panel Replacement or Upgrade from \$2,100 to \$3,000 and increasing the cap for Meter and Riser upgrade from \$1,100 to \$1,700. The new cost cap of \$6,550 includes all five items on this list. Considering that the average cost for an electrical panel upgrade ranges between \$1,300 to \$3,000³, and for a meter and riser upgrade ranges between \$500 to \$1,700, coupled with the escalating prices of materials and labor, this adjustment aims to align the payments available through the Initiative with the reasonable costs expected for these services by Approved Vendors.

The Program Administrator also suggests increasing the cost cap for Roofing and Structural repairs from \$10,000 to \$14,000. With this modification, the cost cap for full roof replacement would rise to \$12,000. The other cost caps within this category, such as Required Permit Fee, Solar-related roof work, and Sister Rafters, would remain unchanged. However, considering that an Approved Vendor may need to undertake both a roof replacement and structural upgrades involving sister rafters within a single project, increasing the total cost cap to \$14,000 would provide Approved Vendors the flexibility to utilize the maximum amount allocated for both roofing and

¹ <https://www.angi.com/articles/how-much-does-tree-removal-cost.htm>

² There is no limit on the number of trees for this cost cap as long as the total follows the maximum cost cap of \$4,000.

³ <https://www.thisoldhouse.com/electrical/reviews/cost-to-upgrade-electrical-panel>

structural repairs (including sister rafters). The proposed cost caps are below. The updated total allowable cost cap for an individual project in the Home Repairs Initiative would be \$24,700.

ELECTRICAL :

Item or Fee	Maximum Cost ⁴
Required Permit Fee(s)	\$150
Main Service Panel Replacement or Upgrade	Up to \$3,000
Meter and Riser Replacement or Upgrade	Up to \$1,700
Main Service Panel Grounding	Up to \$300
Water Grounding (100/200 amps)	Up to \$700/\$1,400

ROOFING AND STRUCTURAL :

Item or Fee	Maximum Cost per Unit	Maximum Cost ⁵
Required Permit Fee	--	\$500
Solar-related Roof Work ⁶	Up to \$200 per sq. ft.	Up to \$3,000
Full Roof Replacement ⁷	--	Up to \$12,000 ⁸
Sister Rafters	Up to \$100 per rafter	Up to \$2,000

4. The Program Administrator recommends adding an administrative flat fee for each Home Repair Project.

Several Approved Vendors have highlighted upfront costs, potential unexpected expenses during construction, and increased administrative workload as barriers to participating in the Initiative. By introducing an administrative flat fee of \$100 per project that would be added to the Total Home Repair Value, the aim is to make the Home Repairs and Upgrades Initiative more enticing for Approved Vendors. This would bring the total allowable cost cap for an individual project in the Home Repairs Initiative would be \$24,800.

a. Should the Program Team adjust the administrative flat fee amount? If yes, what should the administrative flat fee be?

5. The Program Administrator recommends implementing a goal of 50-75 projects with the Initiative.

The Program Administrator recommends a goal of 50-75 projects with the Home Repairs & Upgrades Initiative. Increasing the maximum additional cost per project to \$24,700 will hopefully encourage participation by

⁴ The total cost for all electrical work must not exceed \$6,550, in adherence to the cost cap.

⁵ These Maximum Costs have been set based on estimated prices for a home with a roof size of 2,000 ft² and a standard slope of 25 degrees. In adherence to the cost cap, the total cost for all roofing and structural work must not exceed \$14,000.

⁶ This includes any leak, puncture, decking, or work needed directly associated with the solar installation.

⁷ This includes tear off and replacement of a single layer of shingles.

⁸ The cost cap of \$12,000 for a full roof replacement must include all related roofing costs (e.g., permitting fees) in its total calculation, and must not exceed \$12,000, in adherence to the cost cap.

Approved Vendors in the Initiative but may reduce the number of projects allowed in comparison to Program Year 6. Implementing a goal of 50-75 projects with the Home Repairs & Upgrades Initiative still leaves room for additional Approved Vendors to participate and provides the Program Administrator opportunity to increase the data and information gathered from the Initiative.