# Illinois Solar for All

## Designating Environmental Justice Communities Feedback Session

Thursday, January 17, 2019

Comments due no later than Thursday, January 31 2019 at 12:00 PM CST
Send comments to comments@illinoissfa.com

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GRID ALTERNATIVES

Shelton Solutions Inc.

# Agenda

- Solar for All Program Overview
- Environmental Justice Community Requirements
- Analytical Designation Methodology
- Self-Designation Methodology
- Tools
- Next Steps

# Program Overview

# Illinois Solar for All Incentives & Benefits

- Solar incentives targeted to low-income and environmental justice communities.
- Higher value incentives than general market solar program to allow greater benefits to be passed on to qualified participants.
- Job training requirements accelerate workforce development.
- Grassroots Education funding to help build awareness in hard-to-reach communities.

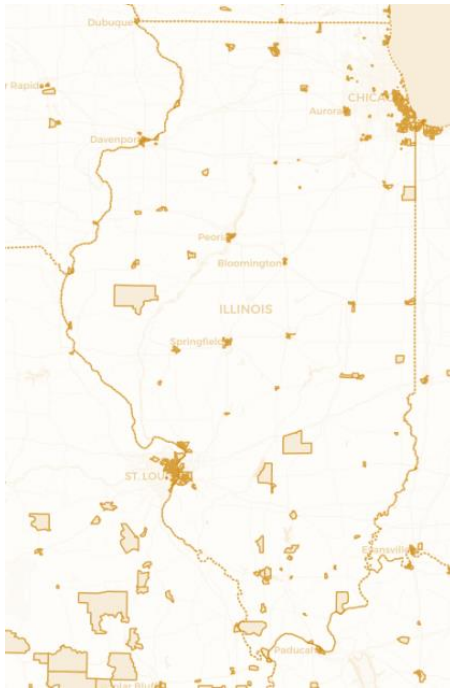
# Serving Participants in Low-Income & Environmental Justice Communities

- Residential property owners and renters, with an income of 80% or less Area Median Income (AMI)
- Nonprofit and Public facilities serving low-income and environmental justice communities
- Targeting 25% of incentives to serve Environmental Justice Communities

# Participant Benefits

- Requirements for a minimum of 50% of PV system value passed on to qualifying participants.
- Requirements for no upfront costs.
- Comprehensive vendor participation requirements.
- Ongoing installation management and inspections.

# Program Incentive Categories




### Distributed Generation

- $7.5 million per year
- 50% savings on electricity*
- No upfront cost to participants

### Nonprofit/Public Facility

- $5 million per year
- Nonprofit or Public Sector facilities
- Connected to or within low-income/EJ communities
- 50% savings on electricity*
- No upfront cost to participants

### Community Solar

- $12.5 million per year
- Installed in low-income or EJ communities
- And/or subscribed to by customers in low-income/ EJ communities
- 50% savings on electricity*
- No upfront cost to customer

### Community Solar Pilots

- $5 million per year
- Funding low-income community solar pilot projects
- Competitive Procurement

**Savings is calculated by dividing total customer expenses for PV system by total system value passed to customers (typically cost ÷ bill credits).*

# Program Funding Sources

- Renewable Energy Resources Fund (RERF)
  - Held by the state of Illinois
  - Originally funded from Alternative Retail Energy Suppliers (ARES) through Alternative Compliance Payments (ACP)
    - $20 million per year
- Utility held Renewable Portfolio Standard (RPS) funds
  - Ratepayer funded
    - $10 million or 5% of RPS funds per plan year, whichever is greater

# Resources

- Long Term Renewable Resources Procurement Plan
  - Requirements for ILSFA as established by the Future Energy Jobs Act (FEJA) and the IPA
  - Overview of ILSFA and key program components, such as Approved Vendors
  - Will be updated in 2019 for 2020 implementation

- IL Solar for All website – www.illinoissfa.com
  - Will become more robust as program launch nears

# Environmental Justice Community Requirements

# Legislative Requirements

- *"It is a goal of this program that at least 25% of the incentives for this program be allocated to projects located in environmental justice communities."*

- *"…the Agency shall define "environmental justice community" as part of long-term renewable resources procurement plan development, to ensure, to the extent practicable, compatibility with other agencies' definitions and may, for guidance, look to the definitions used by federal, state, or local governments."*

20 ILCS 3855/1-56(b)(2); 20 ILCS 3855/1-56(b)(7)

# Environmental Justice Definition

*"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 Act of 1997 (415 ILCS 155)*

- *Developed the hybrid CalEnviroScreen – EPA EJ SCREEN methodology*
- *Established the need for a self-designation process to ensure comprehensive coverage*
- *EJ approach in Plan was developed with stakeholder input*
- *Up to 60% of Grassroots Education funding for campaigns in EJ communities*

# Long Term Renewable Resources Procurement Plan Requirements

# Background on Methodologies

## EJ SCREEN

- U.S. Environmental Protection Agency tool
- Identifies communities with greater risk of exposure to pollution based on 11 environmental indicators, combined with demographic data from the Census Bureau
- Evaluates individual environmental indicators but does not look at cumulative impacts

## CalEnviroScreen

- California Communities Environmental Health Screening Tool from the California Office of Environmental Health Hazard Assessment (OEHHA)
- Compiles data on 12 indicators of pollution burden and 8 population characteristics collected at the Census tract level
- Weights certain factors to develop a score for each area
- Developed over a multi-year, multi-million dollar process

# Environmental Justice Community Designation

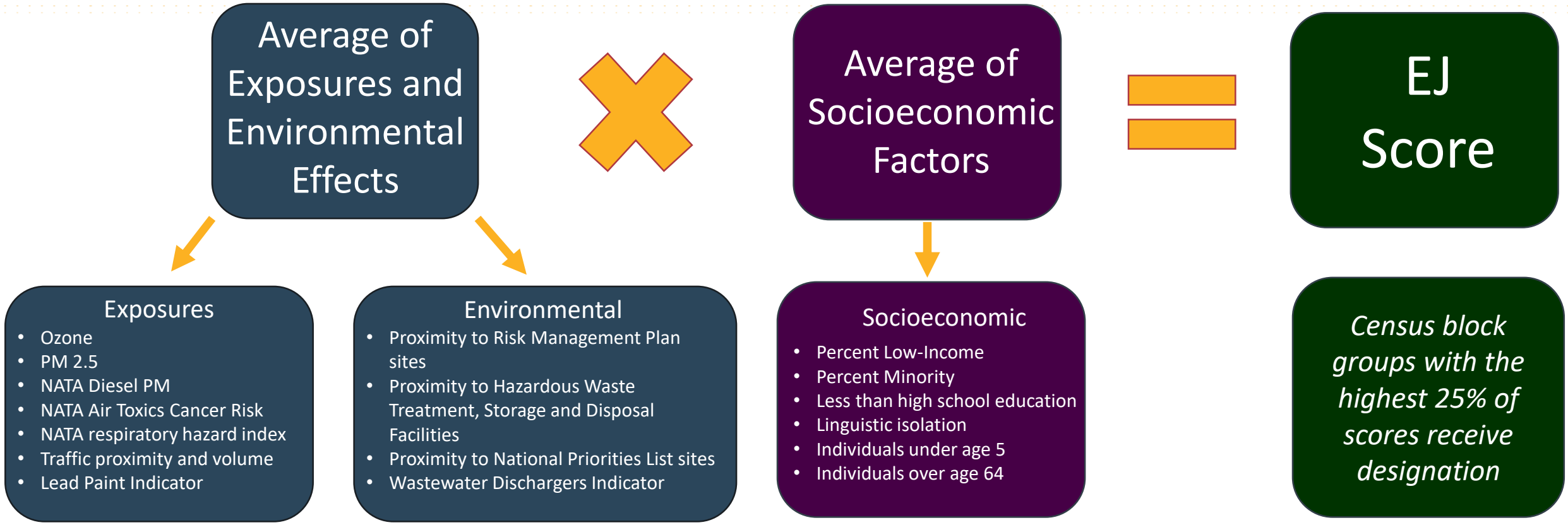
- IL Solar for All Environmental Justice Community designation is solely for the purposes of this program
- IL EPA labels “potential” EJ communities for the purposes of addressing siting and permitting concerns in those areas. This is not a formal or legally recognized designation
  - Defined by the percentage of low-income and/or minority population of the community

# What an Environmental Justice Community Designation Means

- Does **not** replace need for participants to qualify via income level
- Assists Approved Vendors in intentionally pursuing projects in the community
- Helps to ensure that ILSFA projects are being developed in the areas that can benefit most

# Analytical Methodology

# Equation and Indicators




Calculation is based on CalEnviroScreen. The 25% results threshold was determined in the IPA's Long Term Plan

# Defining Census Block Groups

- According to the Census, block groups typically contain 600-3,000 people and are comprised of an average of 40 census blocks
- Based on the EJ SCREEN dataset used, the average population in an Illinois census block group is 1,327 people
- Areas commonly referred to as “communities” contain numerous census block groups

# Understanding the Data

- Each environmental, exposure, and socioeconomic variable was put into perspective by reporting the value as a state percentile
  - For example, the lead paint indicator may show 60% of housing in a block group was built prior to 1960. It may not be obvious whether this is a relatively high or low value, compared to the rest of the state.
  - The data source, EJ SCREEN, reports 60% pre-1960 puts the area at the 80$^{th}$ percentile for IL. This would mean that 20% of IL has a higher value for this indicator.
- This percentile number, not the direct measurement or raw value, is what was used to calculate the final EJ score

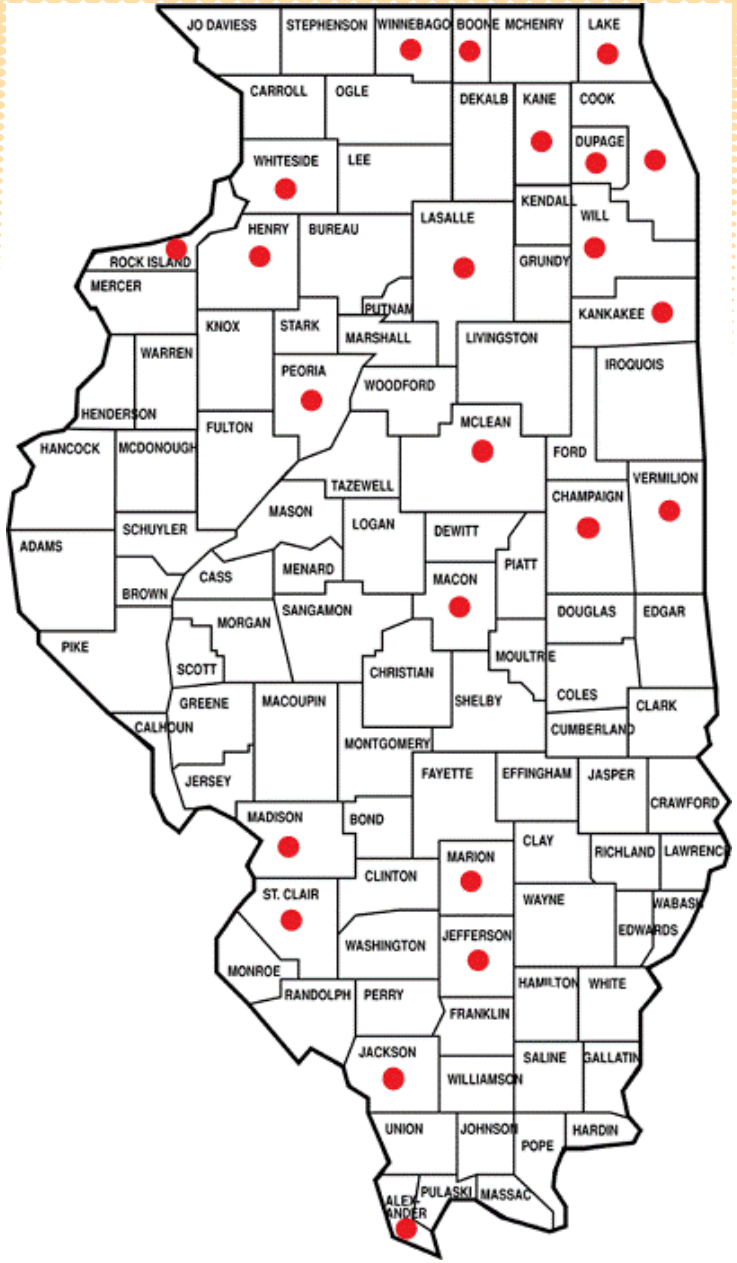
# Weighting and Other Factors

- Exposure factors are weighted twice as much as Environmental factors
  - Consistent with CalEnviroScreen
  - Ensures these factors adequately inform the end results

- Other factors (outside of EJ SCREEN) proposed in the Long Term Renewable Resources Procurement Plan (LTRRPP) were not able to be applied in the calculation, but are included in the self-designation process

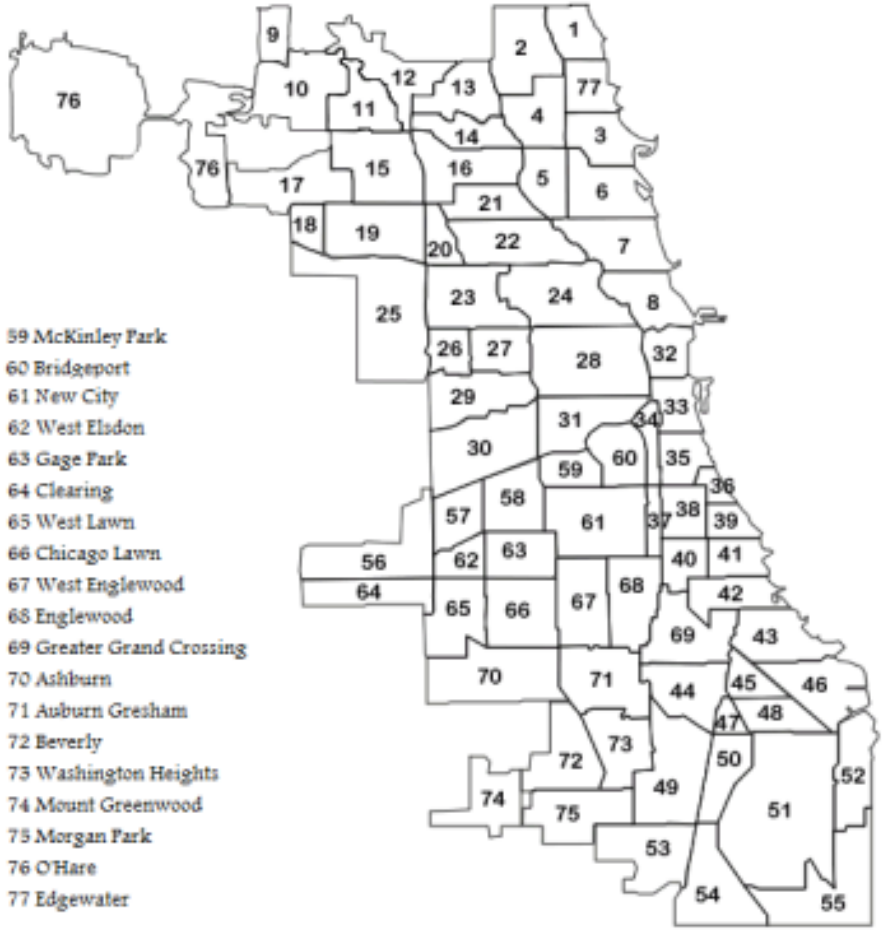
# Results – Data Display

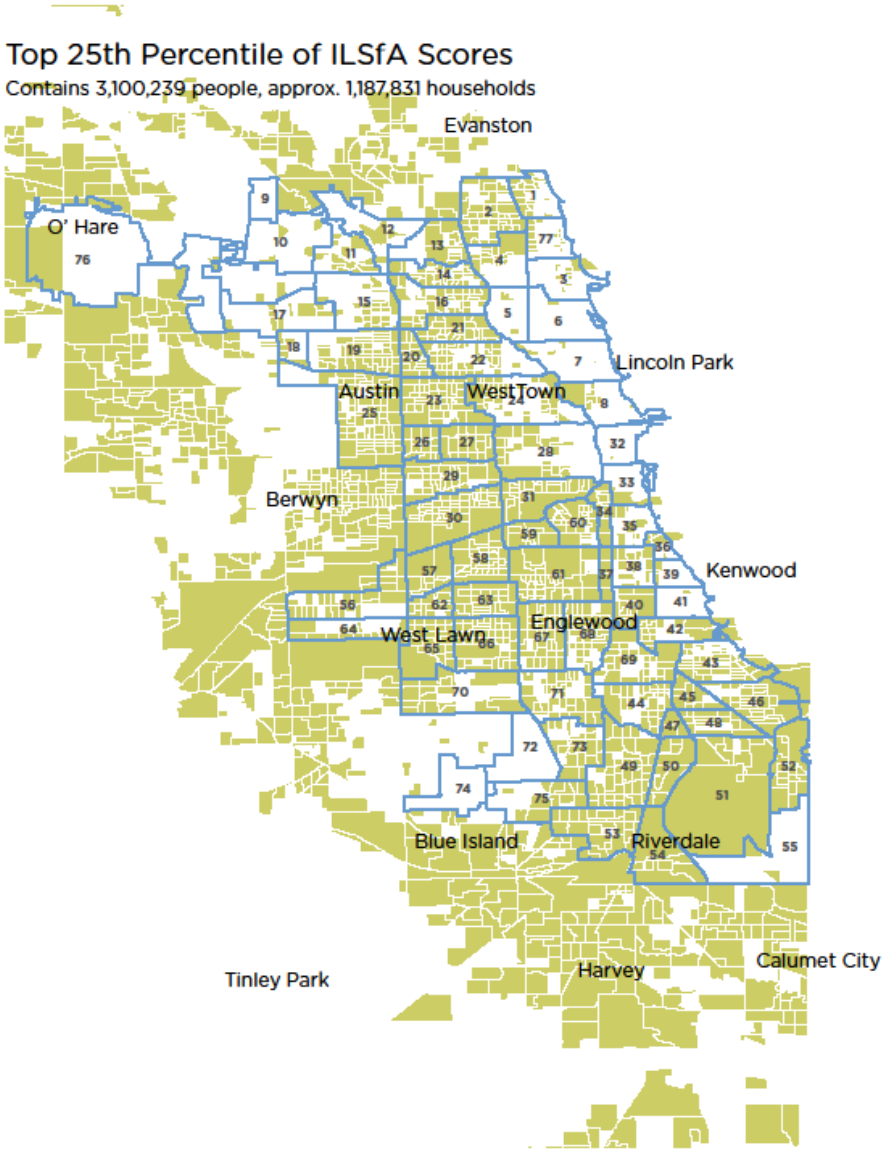
- 2,422 of 9,683 census block groups in Illinois were designated Environmental Justice based on the analysis
  - Represents appx. 3.1 million people or 1.2 million households
- Environmental Justice Communities are located in 23 of 102 counties in Illinois



# Results – Map Display

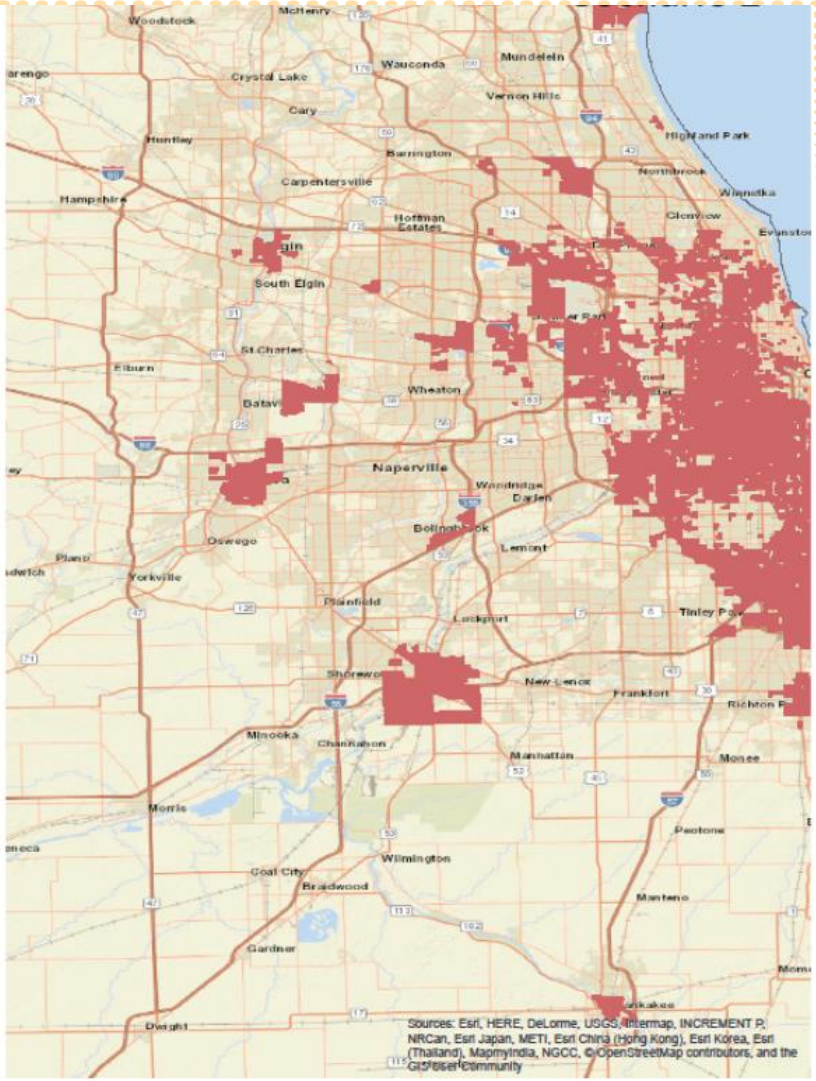
01 Rogers Park
02 West Ridge
03 Uptown
04 Lincoln Square
05 North Center
06 Lake View
07 Lincoln Park
08 Near North Side
09 Edison Park
10 Norwood Park
11 Jefferson Park
12 Forest Glen
13 North Park
14 Albany Park
15 Portage Park
16 Irving Park
17 Dunning
18 Montclare
19 Belmont Cragin
20 Hermosa
21 Avondale
22 Logan Square
23 Humboldt Park
24 West Town
25 Austin
26 West Garfield Pk
27 East Garfield Pk
28 Near West Side
29 North Lawndale
30 South Lawndale
31 Lower West Side
32 Loop
33 Near South Side
34 Armour Square
35 Douglas
36 Oakland
37 Fuller Park
38 Grand Boulevard
39 Kenwood
40 Washington Pk
41 Hyde Park
42 Woodlawn
43 South Shore
44 Chatham
45 Avalon Park
46 South Chicago
47 Burnside
48 Calumet Heights
49 Roseland
50 Pullman
51 South Deering
52 East Side
53 West Pullman
54 Riverdale
55 Hegewisch
56 Garfield Ridge
57 Archer Heights
58 Brighton Park
59 McKinley Park
60 Bridgeport
61 New City
62 West Elsdon
63 Gage Park
64 Clearing
65 West Lawn
66 Chicago Lawn
67 West Englewood
68 Englewood
69 Greater Grand Crossing
70 Ashburn
71 Auburn Gresham
72 Beverly
73 Washington Heights
74 Mount Greenwood
75 Morgan Park
76 O'Hare
77 Edgewater





# Results – Map Display

North/West Suburbs




Rockford-Peoria Area

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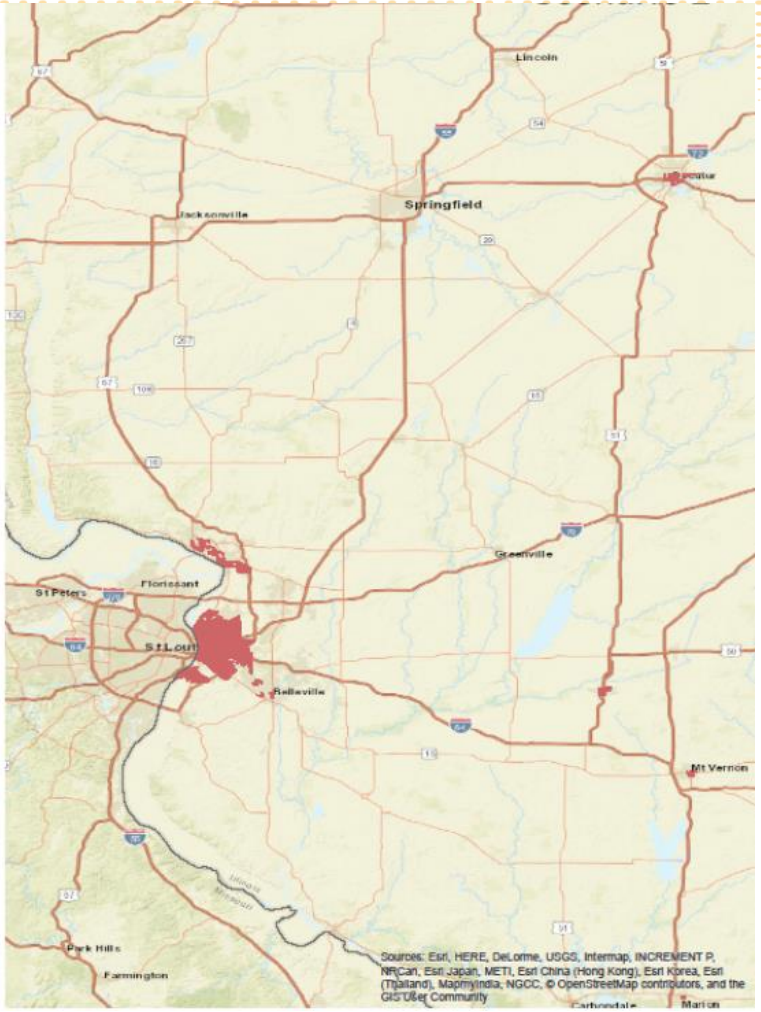
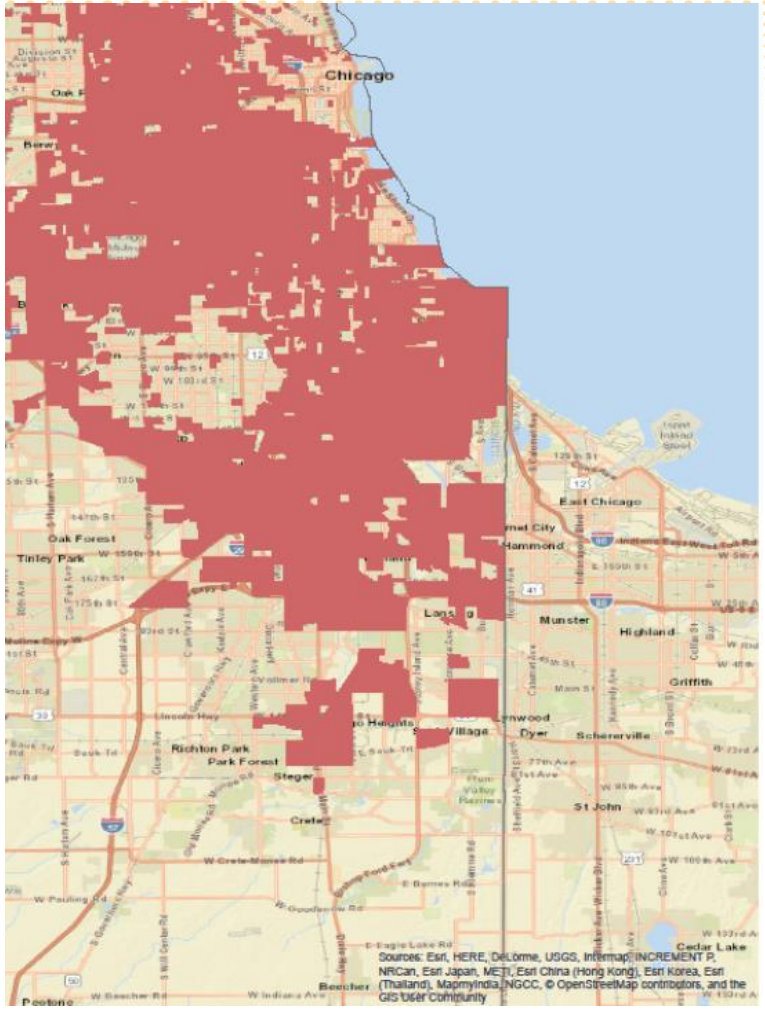
# Results – Map Display

East St. Louis Area




Chicagoland – South Suburbs



1. Is this the appropriate weighting?
2. Do these results represent a reasonably accurate depiction of EJ communities in the state?

# Self-Designation Methodology

# What is the Self-Designation Methodology?

- Self-designation methodology incorporates additional relevant factors that were not able to be incorporated into the analytical methodology
- Assesses quantitative and qualitative data provided by the Community Designator in support of designation
- Will allow for Community-defined geographic boundaries
- Self designations will be accepted and assessed on a rolling basis

# Self-Designation Process Proposal

- Provides examples of, and links to, data that can be used to support EJ designation
- Establishes minimum requirements for number of factors supplied; varies by whether Community is more or less than 50% EJ census block groups
  - Min. 2 quantitative; total of 4 factors for > 50%
  - Min. 4 quantitative; total of 6 factors for < 50%
- Final result for self-designated Communities is that all of the census block groups within the Community boundaries are designated EJ

# Self-Designation Process

- Community Designator facilitates the self-designation process
  - Can be an organization, local govt leader, resident, etc – not proposing to strictly define
- Define Community based on relevant geographic boundaries
  - Streets, county lines, rural highways
- Final designation determinations will be made by Committee
  - composed of representatives from the Program Administration team and external EJ expert(s)

# Self-Designation Factors

## Quantitative

- Drinking Water Watch
- Site Remediation Program
- Leaking Underground Storage Tank Incident Tracking
- State Response Action Program
- Solid Waste Facilities
- Birth Characteristics

## Qualitative

- Historical events
- Environmental disasters/ severe weather events
- Plant openings/closures/operations
- Economics
- Community Toxicity & Poor Health
- Resource Starvation

3. Is this an acceptable approach to self-designation?
4. Are there additional geographic boundaries that will need to be used to self-identify a community?
5. Are there other factors that should be expressly included in the process?
6. What time constraints should be applied to the supporting data?
    a. Should this be different for quantitative vs. qualitative factors?
7. Are the minimum submission requirements reasonable?

# Tools

# Applying the Environmental Justice Community Designation

- Address look-up tool for Approved Vendors and the public to use in determining whether a household or project site falls within a designated EJ Community
- Statewide map(s) to view designated EJ census block groups
- Administrator will be tracking projects & participants from EJ Communities to determine progress toward 25% goal

8. Are there additional tools that will be needed by participants, Approved Vendors, Communities, or others to access Environmental Community designation information?

# Next Steps

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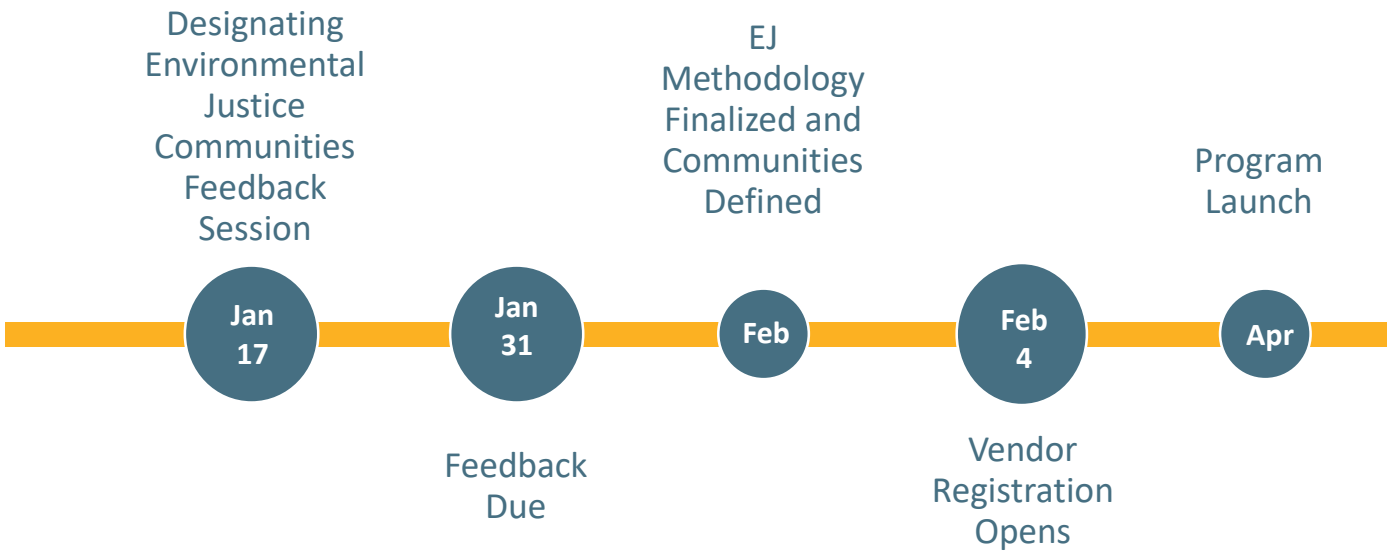


- One-on-one follow up between the Program Administrator and stakeholders will be provided upon request
  - Opportunity to explore data/analysis in more detail to inform feedback

# Contact Us

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