

Grace Rink, Quercus Consulting

Comments on Grassroots Education Funding & Outreach

I am writing to express an opinion of how community based organizations should be defined. I understand there are two choices:

1. Apply the definition of "community groups" in section 8.6.2 of the Final Renewable Resources Procurement Plan wherein "Community groups" are those where the majority of the governing body and staff consists of local residents; the main operating offices are in the community; priority issue areas are identified and defined by residents; solutions to address priority issues are developed with residents; and program design, implementation, and evaluation components have residents intimately involved, in leadership positions. **OR**
2. Apply the definition of nonprofit/public sector critical service providers as defined in nonprofit/public sector sub-program of the IL Solar for All program wherein (1) non-profit or public agencies are located *within* qualifying low-income or environmental justice communities *and* (2) offer essential services, including those that support a basic standard of living (e.g. food, shelter, safety); provides educational and social development opportunities; offers medical care and prevention services; or deploys social, emergency or municipal services.

I believe Option 2 (nonprofit/public sector) should be the applicable definition. It is more broad and likely enables organizations of greater reach and capacity to participate.

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My comment poses two scenarios where public outreach would either promote specific community solar or Solar for All subscription plans or implicitly favor one or more plans serving a specific community. I absolutely understand the objective in wanting the SFA grassroots education effort to focus on targeted groups without promoting certain products, I just wonder if there is room for what is described here?

- Community solar – If a municipality secures a community solar subscription for its own consumption, and negotiates an agreement with the provider to extend its pricing to residents, small businesses, non-profits, and other local units of government (i.e., libraries, parks), the sponsoring agency would logically promote that specific subscription plan to its residents.
- Large Scale Solar – If a municipality contracts with a developer to install a community solar array on city-owned property, the municipality would promote subscriptions to that array to its residents (the array may be eligible for Solar for All as well).

In both scenarios, I think a community-based organization should be able to mention that these subscription plans are available. Rules can be established that require outreach efforts to provide basic information on all (or at least 3-5?) community solar/solar for all subscription options available to their target community. Perhaps something to the effect of “if outreach efforts will include information about specific community solar/solar for all subscription options, then information on at least three different plans must be provided (if at least three plans are available to the target community). The information provided must be uniform for all plans and include the provider name and contact information (phone, e-mail, website), subscription rates, and any unique contract terms, subscriber benefits, or additional fees.”