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# **Approved Vendor Manual**

VERSION 2.0

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# **1. Introduction**

The Illinois Solar for All (ILSFA) Approved Vendor Manual is intended to provide detailed guidance for Approved Vendors on the intent, requirements, and processes of the Illinois Solar for All 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 Illinois Solar for All Approved Vendor Manual v2.0 of May 15, 2019 is released to coincide with the launch of the Illinois Solar for All program. This version contains minor updates to the first three sections of the manual as well as the remaining sections of the complete manual not released in the February 19, 2019 version. Changes from previously released versions are highlighted in this manner.

This manual presents resources and information needed to help Approved Vendors and Approved Vendor applicants navigate the requirements and processes of the Illinois Solar for All 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 and environmental justice communities 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 Illinois Solar for All website: <u>www.IllinoisSFA.com</u>. On this website you will find an online portal for registering as an ILSFA Approved Vendor. 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 to completion.

The website also provides information and resources to the public and other program stakeholders, including resources on participant eligibility, job training, grassroots education funding, environmental justice communities, and more. The Program Administrator will use the website and electronic communications as the primary method of sharing and exchanging information with Approved Vendors.

#### **1.1.1. LEGISLATION AND ADMINISTRATION**

Illinois Solar for All 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). The Illinois Power Agency (IPA or Agency) 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.









- 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. RERF funds are held by the State of Illinois and originally came from Alternative Retail Energy Suppliers through Alternative Compliance Payments. The approved Long-Term Renewable Resources Procurement Plan (Plan) allows for \$20 million annually to fund ILSFA from the RERF. The utility-held Renewable Portfolio Standard funds were collected from ratepayers through dedicated bill riders for funding renewable energy resources. The current Plan allows for \$10 million annually or 5% of the available funds, whichever is greater, to fund ILSFA. This dual source of funding creates some complexities in contracting for REC purchases. REC contracts will be solely with one or the other holder of funds, with a priority being placed on RERF funds.

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

A complete description of the Illinois Solar for All program can be found in Chapter 8 of the <u>Plan</u>. The Plan lays out requirements for the development and implementation of Illinois Solar for All, including annual funding, Approved Vendor requirements, consumer protections, vendor marketing guidelines, and incentive values. The 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 environmental justice communities, among other important program parameters.

The current Plan was approved by the Illinois Commerce Commission and provides a framework for program delivery through 2019. The Agency expects that as part of its procurement planning process conducted in calendar year 2019, changes to the Plan may be made for implementation starting in calendar year 2020. This manual may be subject to change based on subsequent changes made to the Plan. In addition to the approval of the Agency's Plan, many other aspects of photovoltaic development and installation in Illinois are under the jurisdiction of the Illinois Commerce Commission. These include the certification of distributed generation installers, interconnection standards, net metering tariffs, and tariffs allowing for a smart inverter rebate for nonresidential photovoltaic (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 low-income and environmental justice communities across Illinois. Eligible low-income households, non-profit organizations, and public agencies that participate in ILSFA see significant electricity savings, no upfront costs, and are provided comprehensive consumer protections important to the unique needs of these communities. While the <u>Adjustable Block Program</u> (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 Illinois Solar for All 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, access to workforce development, or 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. It 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. Illinois Solar for All provides special consideration to environmental justice communities by setting a goal that at least 25% of program funds be allocated to projects located in or serving environmental justice communities. In addition, the grassroots education funding initiative within the Plan requires that up to



60% of those funds or up to 3% of program funds be allocated to educating environmental justice communities on the benefits and opportunities of the program.

A methodology for determining which communities in Illinois qualify as environmental justice communities for the purposes of ILSFA was established in the Plan and has been further refined by the Program Administrator and Agency through a stakeholder process. An interactive mapping tool is available that allows users to identify qualifying environmental justice communities (currently based on the initially proposed methodology, to be finalized later) by census blocks across the state. This tool provides a visual guide to these communities in the form of a map and an address lookup tool that allows users to enter any address in the state and determine whether or not that property qualifies as being within an environmental justice community.

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

The Self-Designation Application can be found here.

Access the Illinois Solar for All Environmental Justice Community Map here.

Access the Illinois Solar for All Self Designation Process here.

# 2. Sub-Programs Overview

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

All ILSFA sub-programs require that participants see no upfront costs and a minimum specified savings, where ongoing costs or fees to the participant do not exceed 50% of the value of energy produced by <u>their PV system or, in the case of community solar,</u> <u>their share of the installed PV system</u> (see Section 5 on Participant Savings Requirements of this manual for more details). In addition, a number of important consumer protections are required and differ across sub-programs.

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 Illinois Power Agency for RERF-funded REC purchases or from Illinois electric utilities for ratepayer-funded REC purchases.

## **2.1. Low-Income Distributed Generation**

#### Annual Budget: \$7.5 million

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 incentive is intended to provide funding for photovoltaic projects located on residential properties where 50% or more of the households are low-income. See section 5.2 of this manual, Project and Participant Eligibility, for more detail.

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

TABLE 2.1.	INCENTIVES	FOR	1 -	TO 4-UNIT	BUILDINGS	MARKET	SEGMENT	(\$/REC)
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<sup>&</sup>lt;sup>1</sup> The exceptions to the rule of all RECs generated being delivered and compensated are as follows: any unsubscribed share of a Low-Income Community Solar project would not receive payment for its RECs and those RECs would not be required to be delivered. Additionally, any subscribed share of a Low-Income Community Solar project that has a non-low-income subscriber other than the project's anchor subscriber would not receive payment or have a delivery obligation for the associated RECs.

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

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

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. The exception is that multiple projects may be located on the same roof if it can be demonstrated that the projects serve different occupants.

## 2.2. Non-Profits/Public Facilities

#### Annual Budget: \$5 million

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

Non-Profit/Public Facilities projects must be located within low-income or environmental justice communities. <u>Additionally</u>, and-projects must demonstrate **one** (not both) of the following two conditions:

- 1. Having a sufficient connection to and input from the low-income or environmental justice community members and/or the non-profit or public facility it 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
  - 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

 The energy customer or property owner is a qualified critical service provider defined as a non-profit or public sector entity that offers essential services to low-income or environmental justice communities

System Size	Group A	Group 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

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

## 2.3. Low-Income Community Solar Project Initiative

#### Annual Budget: \$12.5 million

Low-Income Community Solar projects are installed anywhere within the utility service territory where subscribers are located. Low-Income Community Solar projects are installed on rooftops or ground-mounted and are interconnected directly to the utility's distribution system. Low-Income Community Solar incentives are intended to provide funding for community 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 Low-Income Community Solar project must be low-income residential households (which for this purpose includes a mastermetered affordable housing building) and RECs produced from the corresponding subscription shares will receive the Low-Income Community Solar prices shown below. No subscriber may have greater than a 40% share of the system capacity. A Low-Income Community Solar project may have, at most, one anchor subscriber (also referred to in Public Act 99-0906 and the Plan as an "anchor tenant"), identified at the time of project application, that is not a low-income residential household. An anchor subscriber may be any ratepaying entity, including a non-low-income residential household, a business, a non-profit organization, or a public sector entity.

RECs produced from the anchor subscriber's share of the project will be paid based on currently applicable Adjustable Block Program prices, except in the case of a non-profit or public sector anchor, whose subscription share will receive REC payments at the Low-

Income Community Solar price. Outside the anchor subscriber, any subscription share that <u>is not</u> subscribed by a low-income residential household <u>will not receive payments</u>, <u>nor will the Approved Vendor be required to deliver those RECs through the ILSFA REC</u> <u>contract</u>. At least 50% of non-anchor subscribers (in kW volume) must be identified <u>by</u> <u>one year after at</u> the time of energization in order to receive payment based on an expectation that all the physical capacity not accounted for by the anchor subscriber will ultimately be subscribed.

Collateral of 5% of total remaining project REC value must be maintained for 10 years. Annual reporting is required to verify <u>new</u> 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 Plan provides a REC adder for Low-Income Community Solar 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 Illinois Solar for All Approved Vendor will need to certify the intent for the project to be 100% low-income subscriberowned 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 after six years of energization systems that have applied for this adder have not fully transferred ownership to qualifying entities, collateral may be drawn upon to claw back the adder amount received as payments for RECs up to that point. 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.

System Size	Group A	Group 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

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



>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)

System Size	Group A	Group B
≤10 kW	\$96.12	\$91.89
>10 - 25 kW	\$87.07	\$82.82
>25 - 100 kW	\$70.95	\$66.65
>100 - 200 kW	\$60.47	\$56.12
>200 - 500 kW	\$55.46	\$51.09
>500 - 2,000 kW	\$52.28	\$47.88
Co-located systems exceeding 2 MW in aggregate size	\$47.03	\$42.59

#### SMALL SUBSCRIBER ADDER

Like the Adjustable Block Program, small subscriber price adders can be applied based on the percentage of the energy output of the project subscribed to by small subscribers, and not the number of small subscribers. However, the percent of qualifying small subscribers is determined by the share of the project subscribed by lowincome households (with subscription sizes under 25 kW) only, and not small nonresidential anchor tenants. As described in more detail in Sections 6.15.3 and 6.17 of the 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 measured-further adjusted by subscriber share from annual reporting at the end of the first year and revised accordingly in the REC delivery contract for all future deliveries, and the subscription share of residential small subscribers will be evaluated in all future delivery years (with clawbacks 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 program year one).

Adder (\$/REC)	Group A	Group B
Less than 25% small subscriber	No Adder	No Adder
Greater than 25% to 50% small subscriber	\$11.17	\$10.88
Greater than 50% to 75% small subscriber	\$22.34	\$21.77
Greater than 75% small subscriber	\$33.51	\$32.65

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

# 2.4. Low-Income Community Solar Pilot Projects

The Low-Income Community Solar Pilot Projects will be conducted as a separate competitive procurement, facilitated by the Illinois Power Agency's Procurement Administrator. The Low-Income Community Solar Pilots 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 pilots are like the other sub-programs in the requirements of community economic benefit and partnership, the pilots are different in that they will be developed outside the processes and guidelines described in this program guide-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 kilowatts applicable to Low-Income Community Solar Project Initiative projects will not apply for the pilots. More information can be found on the Low-Income Community Solar Pilots here.

# 3. Approved Vendor Requirements and Registration

Participation in the Illinois Solar for All program will take place through Approved Vendors in the same way as the Adjustable Block Program. 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 Illinois Solar for All 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 projects for Illinois Solar for All: 1) Approved Vendors, 2) Aggregator Approved Vendors, 3) Aggregator 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. Illinois Solar for All creates Aggregator Approved Vendors and Aggregator Designees, two new Approved Vendor types that will work collaboratively to develop projects. All Approved Vendor types, except for the Aggregator 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

Approved Vendors will be the entity that is the contractual counterparty with either the Illinois Power Agency or an Illinois electric utility for RECs purchased through the Illinois Solar for All program, 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 Aggregators play in the market is an important one, especially for small or new solar installation companies. These Aggregators can help to provide important services to qualified entities that may otherwise face barriers in the market. Renewable Energy Credit Aggregators will work within the Illinois Solar for All program managing RECs on behalf of system owners. Aggregators function as a counterparty to contracts with REC purchasers, allowing system owners the opportunity to generate revenue from the sale of their RECs.

Designees or system owners will contract directly with Aggregators, working within the Aggregator's business and fee structure as a separate contractual arrangement from this program. Aggregators must first be registered with the Adjustable Block Program, while the Designee does not. 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 the Designee. Similarly 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.

#### AGGREGATOR DESIGNEES

It is anticipated that the Aggregator 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 Approved Vendor Aggregator. While Approved Vendor Aggregators are ultimately responsible for meeting all program requirements, Designees will be 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 remedial action or warning and suspension status for both the Designee and the Aggregator.

Aggregator Designees are not required to register for the Adjustable Block Program. However, Designees are required to register for Illinois Solar for All in the same way as an Approved Vendor. Designees can register for Illinois Solar for All 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 Approved Vendor Aggregator at the time of project approval application.

#### SINGLE PROJECT APPROVED VENDOR

Entities can choose to register as an Illinois Solar for All Single Project Approved Vendor according to the limitations and requirements set forth in the Plan. Single Project Approved Vendors within the Illinois Solar for All 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 Illinois Solar for All or the Adjustable Block Program, but not both

The following Illinois Solar for All 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 Illinois Solar for All standard brochures

Note that for community solar projects, all consumer protection requirements for Illinois Solar for All, 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 10% of all hours performed being performed by qualified trainees. See the Job Training Requirements section of this manual for more details.

# **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 installer/contractors 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 remedial recourse or removed from the program accordingly. Specifically, Designees will need to register with ILSFA and installer/contractor 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 Aggregator Designees or subcontractors, in a manner consistent with the requirements of the Long-Term <u>Renewable Resources Procurement Plan</u> and of the Approved Vendor's REC delivery contract with the relevant counterparty.

Approved Vendors must renew their approval with the Adjustable Block Program annually to maintain an active status with Illinois Solar for All. Failure to do so will result in suspension or removal from the program. While there is no requirement to renew registration annually for the Illinois Solar for All program, Approved Vendors must meet all program requirements, including annual performance requirements, to maintain active status with Illinois Solar for All. An annual review by the Illinois Solar for All Program Administrator will assess each Approved Vendor to ensure all program requirements have been met. Annual performance reviews may result in remedial recourse or removal from the program based on details outlined elsewhere in this manual. Losing status as an Illinois Solar for All 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: <u>www.IllinoisSFA.com</u>. 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 the Designee is not required to register with the Adjustable Block Program, it must first be designated, and its final registration submission be approved by, an Aggregator Approved Vendor. 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. Aggregator Approved Vendors 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 that Approved Vendor, to clarify the roles, and to clearly state how each response corresponds to those entities.

# 3.4. Registration Requirements and Scoring Rubric

Every question in the 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 being developed 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 a reasonable timeframe. 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, Aggregator Designees, and Single Project Approved Vendors and a second for Aggregators. For clarity, individual questionnaires with attestations have been created for each vendor type. These forms are completed online at <u>www.IllinoisSFA.com</u>. 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 Aggregator 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 Program's 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, representatives, and agents are expected to perform all work under the Illinois Solar for All Program consistent with the highest technical and ethical standards in their industry. Participation in the Illinois Solar for All 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. Illinois Solar for All Approved Vendors are expected to work with the Program Administrator in a responsive, forthright, and constructive manner. All Approved Vendors, installers, and sub-contractors are expected to conduct any and all business affiliated with the Illinois Solar for All Program in a responsible manner that fosters integrity and public confidence. Work performed through Illinois Solar for All 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 sub-contractors will maintain all required professional licenses or regulatory certifications and are expected to comply with all Illinois Solar for All Program requirements.

#### PROHIBITED ACTIVITIES

Approved Vendors, 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 Illinois Solar for All 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 Illinois Solar for All 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 Illinois Solar for All 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.

If the Approved Vendor is deemed in violation of program compliance by the Program Administrator, the administrator will notify the Approved Vendor through email providing details of the problematic behavior, describing how the behavior is noncompliant, and potentially requesting more information about the issue. The Approved Vendor should respond in a reasonable timeframe to any such requests. After review of the response, the Program Administrator will determine what disciplinary measures, if any, will be taken. 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.



# 4. Project and Participant Eligibility

Eligibility for Illinois Solar for All 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. For example, Low-Income Distributed Generation sub-program participants qualify based on household income. Low-Income Community Solar sub-program participants qualify <u>1</u>) based on <u>documentation of</u> household income or <u>2</u>) by <u>affidavit</u>, for those residing in U.S. Dept. of Housing and Urban Development (HUD) Qualified Census Tracts (QCTs), <u>while the</u> <u>community solar projects themselves must demonstrate partnerships with community</u> <u>organizations</u>. Non-Profit/Public Facilities sub-program participants qualify by property location as well as by the type of entity or by their ability to demonstrate community engagement.

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.

# 4.1. Distributed Generation

#### PROJECT ELIGIBILITY

- Low-Income Distributed Generation systems are installed onsite on residential properties.
- Systems are installed behind a customer's meter or connected directly to the utility side of the 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; Bill credits indirectly as a subscriber to a community renewable generation project connected directly to the utility side of the meter; 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 pay no upfront costs and any ongoing costs and fees are less than 50% of the value of the 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.
- 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 the applicant has partnered with, including letters from those organizations to verify the partnerships.

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

# **4.2. Non-Profits/Public Facilities**

#### PROJECT ELIGIBILITY

- Non-Profit/Public Facilities sub-program projects are installed onsite on properties occupied by a qualified non-profit or 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.
- All participants see 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.
- The project meets all consumer protection guidelines and other program requirements.

#### PARTICIPANT ELIGIBILITY

• Serves the energy loads of non-profit or public sector customers



- Installed on facilities within ILSFA-qualified low-income or environmental justice communities within the state of Illinois:
  - Environmental Justice communities 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 blocks across the state. <u>A map and address look-up tool</u> is available for every address in the state. <u>An additional process is</u> <u>available</u> for representatives of communities to apply to have their geographic area designated as an environmental justice community even if the program's quantitative methodology did not so determine it.
  - Low-income communities are defined as census blocks having a majority (50% or greater) of households at 80% or less of AMI. <u>A map and address</u> <u>look-up tool</u> are available for every address in the state for these communities.
- Demonstrate one of the following:
  - Having a sufficient connection to and input from the low-income or environmental justice community members the non-profit or public agency 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.

#### OR

- The energy customer or property owner is a qualified critical service provider defined as a non-profit or public sector entity that offers essential services to low-income or environmental justice communities, 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
- <u>Law/legal centers (non-profit providing pro-bono services to lowincome communities)</u>
- <u>Libraries</u>
- 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)
- <u>Transitional or supportive housing (including for teens and LGBTQ)</u>
- Women's or children's shelters
- + Youth Centers
- Other types of potential critical service providers not found on this list can be submitted to the Program Administrator to be reviewed on a case-by-case basis.

## 4.3. Community Solar

#### PROJECT ELIGIBILITY

- Low-Income Community Solar 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.
- All participants 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 Plan) the applicant has partnered with regarding the priorities and concerns of low-income community members. This should include letters from those organizations to verify the partnerships.

#### PARTICIPANT ELIGIBILITY

- No subscriber can have a share greater than 40%.
- A single anchor subscriber that is not a low-income household (as defined below) will be allowed. The anchor subscriber's share will receive the applicable Adjustable Block Program REC price unless it is a non-profit organization or public facility, in which case the RECs associated with its subscription share will be paid at the ILSFA Low-Income Community Solar price. The anchor subscriber must be identified at the time of the Part I application.
- Other than the anchor subscriber, 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 subscription) will receive no REC payments <u>and are not</u> <u>obligated to deliver those RECs.</u>
- At least 50% of total energy produced, excluding the anchor subscriber's share (e.g., if the anchor subscriber'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 <u>end of the first year after time of</u> energization.
- Subject to the requirements above, any retail electricity customer in that utility's territory can subscribe to the remaining shares.

# **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. 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.

#### Total Energy Value – Total Costs and Fees = 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.

Savings Dollars Total Energy Value = 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. For example, if a PPA term is 15 years, First Year Savings is calculated using total costs and fees incurred in year 1 and total energy value projected for year 1. 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 15year 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 kilowatt hours 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 (that cannot be incurred upfront), like a loan origination fee or an automated clearinghouse fee, is 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 kilowatt 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%).

#### Year one savings:

- Total costs: 3,000 kWh x \$0.05 = **\$150.00**
- Total energy value: 3,000 kWh x \$0.1248 = **\$374.40**
- 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, a 1.7% annual energy rate escalation and 1.0% annual customer rate escalation.

- Total costs: 43,459 kWh x \$0.05<sup>2</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, a 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%

<sup>&</sup>lt;sup>2</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).

				Customer			
	امتناطع	Energy	Eporgy	Customer	Customor	Customor	Customor
Veer	<u>Annual</u>	rate per	Energy	rate per	<u>Customer</u>	<u>Customer</u>	Customer
Year	<u>kWh</u>	<u>kWh</u>	value	<u>kWh</u>	payments	Savings \$	Savings %
$\frac{1}{2}$	<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>
$\frac{2}{2}$	<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>
2 3 4 5 6 7 8 9	<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>
4	<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>
5	<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>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>
-			<u>\$6,109.47</u>		<u>\$2,329.66</u>	<u>\$3,779.81</u>	<u>61.9%</u>
Buyout Fee at End of Contract							
<u>Term</u>					<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>
20	<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>
21	<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>
22	2,700	<u>\$0.1778</u>	\$480.13	\$0.0616	\$0.00	\$480.13	100.0%
23	2,687	\$0.1808	\$485.85	\$0.0622	\$0.00	\$485.85	100.0%
24	2,673	<u>\$0.1839</u>	\$491.64	\$0.0629	\$0.00	\$491.64	100.0%
25	2,660	\$0.1870	\$497.50	\$0.0635	\$0.00	\$497.50	100.0%
			<u>\$10,828.97</u>		<u>\$2,330.66</u>	<u>\$8,498.31</u>	<u>78.5%</u>

TABLE. 5.1. COST AND SAVINGS CALCULATION EXAMPLE

# **5.5 Determining the Energy Rate**

The energy value is determined by the customer's net metering value as described above. The example in Section 5.4 above assumes a residential distributed generation project with the system installed behind the customer's meter, using an average statewide retail residential rate of \$0.1248 per kilowatt hour. For Low-Income Distributed Generation, Approved Vendors will have the option of using the 12.48 cents average *or* using the customer's actual rate by averaging that rate over the most recent 12-month period of bills; for Non-Profits/Public Facilities, only the 12 most recent bills may be used. The recent bills methodology includes totaling Supply, Transmission, and Delivery volumetric charges for the 12-month period and dividing by the number of kilowatt hours used during that period (i.e., factoring in all but taxes and fees).

For Low-Income Community Solar, the net metering value is determined using the Supply rates only; the calculation may use either a statewide average of \$0.06 per kWh, or the customer's 12 most recent monthly bills.

For multifamily buildings that are multi-metered, savings is calculated in the same way, except using the property owner's rate. Where the system serves only the owner's common load, the savings can be calculated using the property owner's full retail rate. Where the system serves all tenants via Virtual Net Metering or Shared Net Metering, some utilities may provide that the net metering rate is based on the full retail value. Otherwise, the system is considered a community owned generation system and the net metering rate is based on the Supply rate.

# **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 distributed generation 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.

The value is calculated in the same way as any other distributed generation 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

Illinois Solar for All 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, all subscribers to community solar projects and all non-profit or public entities receiving benefits through ILSFA-energized systems. A Basic Information Form is completed for each participant 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. All participant applicant data is captured through the vendor portal at www.IllinoisSFA.com as part of the project approval process during Part I of the project application. Subscriber data for Low-Income Community Solar projects requires annual project data updates where additional subscriber data will be submitted and qualified subscriber shares updated.

#### INCOME DEFINITION

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

The following are also considered income:

- <u>Annuities (a fixed sum of money paid to someone each year, typically for the rest</u> of their life; divide by the appropriate number to get a monthly amount when <u>applicable</u>)
- Armed Forces allotments and allowances for housing, food, and clothing (BAH on paystub)
- <u>Cash gifts (may be verified via Income Affidavit)</u>
- Child support
- <u>Commission checks that cover more than one month should be divided by the</u> <u>appropriate number of months to equal the 30-day income requirement</u>
- Educational Stipends (a periodic payment, especially a scholarship or fellowship allowance granted to a student)
- Federal Black Lung Benefits
- <u>Gambling proceeds and/or annual gross income should not exceed the annual</u> <u>150% income eligibility</u>
- <u>"GoFundMe" or other crowdfunding platforms money received</u>
- <u>GA (General Assistance)</u>
- IRA Regular payments from an IRA (Individual Retirement Account) should be considered income just like a pension
- Online income income received from selling items regularly on eBay or other online sites for profit must be divided by 12 months to equal the 30-day income requirement
- <u>Rental income counted if the applicant rents property outside his/her own</u> <u>household or the applicant shares his/her home, e.g., one household unit with a</u> <u>boarder, lodger, and/or renter who is NOT related</u>
- Sick pay
- <u>Social Security income received for a spouse that resides in a nursing</u> <u>home/assisted living facility that is not paid directly and completely to the facility</u> <u>is countable income for the LIHEAP household</u>
- <u>Strike benefits</u>
- <u>Support income received for guardianship and/or adoption of child(ren)</u>
- <u>Tips and gratuities; money received over and above payment due for a service</u>
- 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
- <u>401k or retirement funds (one-time withdrawal)</u>
- 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
- <u>Sale of household items/assets at yard sales, on eBay, or other online sites is not</u> 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
- <u>Reimbursements from the Uniform Relocation Assistance and Real Property</u> <u>Acquisition Policy Act of 1970</u>
- <u>Tax refunds, including Earned Income Tax Credit (EITC) payments, whether</u> received as an advance payment with wages or as part of an income tax refund

#### **Benefits:**

- <u>Supplemental Nutrition Assistance Program (SNAP) benefits (Food Stamps)</u>
- Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits
- Earned 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:

- <u>Scholarships, subsistence amounts (BAS on paystub an allowance paid to</u> <u>Veterans while they pursue an educational or training program), GI Bill benefits</u>
- 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:

- <u>Tribal per-capita payments up to \$2,000 per person per year, including payments</u> 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

#### <u>Title I:</u>

- <u>Earnings</u>, allowances, and payments received under Title I of the National and <u>Community Service Act of 1990 are exempt; the programs in the Act are:</u>
  - 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.
  - <u>A temporary interruption in SNAP/Food Stamps does not change the status</u> of exempt AmeriCorps VISTA payments.
- Income from employment through Workforce Innovation and Opportunity Act (WIOA), including Job Corps

#### <u>Title V:</u>

• <u>Senior Temporary Training Program; payments received from the Community</u> <u>Service Employment Program funded under Title V of the Older Americans Act</u> (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:

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

#### TRA/DoLeTA:

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

#### INCOME INCLUDED IN VERIFICATION

All members of the household who are over 18 years old and who reported earned income, 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 Low-Income Distributed Generation and Non-Profit/Public Facilities 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. Income must be verified for occupants, as applicable, whether property owners or tenants.

#### 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 <u>participant applicant</u> income verification for Low-Income Distributed Generation and Low-Income Community Solar projects. The Non-Profit/Public Facilities sub-program does not qualify <u>participants applicants</u> based on income and requires a different approach to eligibility verification, detailed in a subsequent section of this document. 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 Low-Income Distributed Generation and Low-Income Community Solar sub-program projects that differ depending on sub-program. It is the responsibility of participants applicants to certify their eligibility and of the Approved Vendor to verify eligibility. 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 participant\_applicant or qualified building according to the methods prescribed below. Regardless of the verification method or sub-program, the participant 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. 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. <u>Customers Households</u> who 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.

Qualifying Program	Supporting Documer	Verification Level	
Supplemental Nutrition Assistance Program (SNAP)	Timeis Department of Human Services	Award Letter from Illinois Department of Human Services	Individual
Low-Income Home Energy Assistance Program (LIHEAP)	Ullinois Department of Commerce & Economic Opportunity	LIHEAP Award Letter from household's local Community Action Agency	Household
Illinois Housing Weatherization Assistance Program (IHWAP)	Illinois Department of Commerce & Economic Opportunity	IHWAP Award Letter from household's local Community Action Agency	Household

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

			1
Medicare	MEDICARE HEALTH INSURANCE JUCK SURTIN MEDICARE HEALTH INSURANCE JUCK SURTIN MEDICARE HEALTH INSURANCE JUCK SURTIN MEDICARE HEALTH INSURANCE JUCK SURTIN MEDICARE HEALTH INSURANCE SURTIN	Benefit letter from the Social Security Administration or Current Red, White, and Blue Card with a Medicare Number (not a Social Security number and the letters should not include S, L, O, I, B, or Z)	Individual
U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers	CHARACTOR AND DEVELO	HUD Award Letter or current statement	Household
U.S. Department of Housing and Urban Development (HUD) Project-Based Rental Assistance	ON BRANDEAEROSARE ON DEAEROSARE ON DEAEROSAR	HUD Award Letter or current statement	Household
Income-Eligible Multifamily Energy Efficiency Programs	Comfed. An Exelon Company	Eligibility based on qualified census tracts where 50% or more households are 80% or below Area Median Income (see <u>Address</u> <u>Look-Up Tool)</u>	All building tenants
Tax-Subsidized Multifamily Programs	National Housing Preservation Continue Low INCOME HOUSING COALITION Database	Report, exported data, or screenshot of the National Housing Database subsidies for that building	All building tenants



Illinois Affordable Housing Act



FY 2019 Fair Market Rent Documentation System

Household

#### METHOD B: TAX TRANSCRIPT VERIFICATION

Experian 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. <u>A PDF displaying qualified incomes by Illinois</u> <u>county and household size</u> 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 Experian 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 within 24 to 48 hours. The Approved Vendor must destroy hard copies of completed 4506-T forms within one week of when applicant eligibility has been determined.

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 is made available via the Approved Vendor portal. For all household members age 18 and over, photo or electronic copies of their previous year's income tax return documents or pay stubs from the previous two calendar months may 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 and only trained employees may handle the documents (this policy also applies to handling of Form 4506-T, discussed above). 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 when eligibility has been determined. When paystubs are used as the income verification method, documentation of each household member must be included. This may include copies of a driver's license, a utility bill, or school registration. For children under the age of five, birth

certificates or doctor records may be use. Additional documentation will be accepted on a case-by-case basis. These documents should be treated as sensitive information by the Approved Vendor and deleted within one week of notification 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>U.S.</u> HOUSING AND URBAN DEVELOPMENT<u>DEPT.</u> (HUD) QUALIFIED CENSUS TRACTS

Low-Income Community Solar sub-program projects allow for an additional household eligibility verification method using HUD 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 via the Approved Vendor portal at <u>www.IllinoisSFA.com</u>. Approved Vendors will enter the address into the tool and a pass or fail will be displayed. Eligibility is then validated by the Approved Vendor once data is entered into the portal for that household. <u>Note: A Basic Information form, the affidavit</u> <u>where the applicant certifies that they make less than 80% AMI, will still be required.</u>

#### INCOME VERIFICATION FOR MULTIPLE ADULT HOUSEHOLDS

For households with multiple adults requiring income verification, various methods of verification can be used, with some limitations. Households that qualify at the household or property level do not need to verify income individually (e.g., one qualifying for Low-Income Community Solar using 1) HUD QCTs, 2) LIHEAP or IHWAP, 3) HUD Project-Based Vouchers or Rental Assistance Vouchers, or 4) Tax-Subsidized Multifamily Programs). Where individuals must each verify, they must verify using the same or similar method (e.g., all adults in a household can verify using <u>credit bureau</u> tax transcripts, tax returns, or paystub methods, or all adults in a household cannot verify across these methods).

#### ZERO INCOME VERIFICATION

**Zero Income Household**: Households where every member included on the application is claiming zero income must complete the Zero Income Affidavit.

#### VERIFICATION PROCESS OVERVIEW

The verification process differs for each sub-program. Low-Income Distributed Generation and Low-Income Community Solar sub-program projects require income certification by applicants, verification by the Approved Vendor, and validation by the Program Administrator. Since HUD QCTs are allowed <u>as eligibility verification</u> for Low-Income Community Solar 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 participants. Property owners are not required to live onsite.

## **6.1. Low-Income Distributed Generation**

**Step 1:** The Approved Vendor will collect a completed Participant Household Basic Information Form from every adult for every residential unit in the building and send/upload to the Program Administrator unless the project is on a building with five or more units that is demonstrating income eligibility through whole building verification. The Participant Household Basic Information Form will capture key contact information including legal name of home owner, 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, will be sent electronically to the Program Administrator via the Approved Vendor portal. Additionally, when there are two or more units, the owners must sign an affidavit that commits to maintaining affordability for the next five 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 Area Median Income using either the current <u>Illinois Solar for All Area Median Income worksheet</u> or the online Illinois Solar for All Area Median Income worksheet the Participant Household Basic Information Form.

**Step A2:** The Approved Vendor will determine if the participant <u>applicant</u> 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: <u>Credit Bureau Tax Transcript Verification</u>.

**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 unaccepted will be returned to the Approved Vendor.

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

If the response is unaccepted, the Approved Vendor will <u>have the opportunity to submit</u> <u>updated or additional documentation or</u> go to Method B: <u>Credit Bureau</u> <u>Tax Transcript</u> <u>Verification</u>.

#### Method B

#### Credit Bureau 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 <u>credit</u> <u>bureau</u> the third party, Experian, using fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable).

**Step B2:** Experian will provide verification data to the Program Administrator within 24 to 48 hours.

**Step B3:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or unaccepted response to Approved Vendor.

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

If the response is unaccepted or if the information cannot be provided by the credit bureau 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 returns or most recent paystubs capturing two previous month's earnings for all household members age 18 and over. <u>When using paystubs, documentation for the presence of each household members claimed on the Basic Information Form must be included</u>.

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

**Step C3**: The Program Administrator will compare income level to 80% AMI threshold and return an accepted or unaccepted response to Approved Vendor.

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

If the response is unaccepted due to missing or incorrect documentation, the Program Administrator may request additional information via e-mail. 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 Illinois Solar for All, the Approved Vendor may formally appeal to the Illinois Power Agency.

The Approved Vendor on behalf of the applicant will have 2 weeks to appeal the rejection in writing on company letterhead conveyed by e-mail 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 posession of the Approved Vendor will be destroyed after applicant eligibility is determined.

## 6.2. Non-Profits/Public Facilities

**Step 1:** The Approved Vendor will collect a completed Non-Profit/Public Facilities Basic Information Form and send/upload it to the Program Administrator electronically. The Non-Profit/Public Facilities 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. <u>Additionally, if the Non-Profit is not the owner of the property, contact</u> <u>information for the owner must be provided.</u>

#### LOCATION VERIFICATION

The Non-Profit/Public Facilities sub-program eligibility criteria allows for two paths to qualify the property by location. The property must be in either a qualifying Illinois Solar for All environmental justice <u>community</u> or low-income community.

**Step A1 (Environmental Justice Community Verification):** The Approved Vendor will enter the property address into the <u>Illinois Solar for All Environmental Justice</u> <u>Community Mapping Tool</u>.

If the response is qualified <u>(this would include locations that have been approved via the</u> <u>Environmental Justice Community Self-Designation pathway</u>), 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.



**Step A2 (Low-Income Community Verification):** The Approved Vendor will enter the property address into the <u>Illinois Solar for All Low-Income Community Mapping Tool</u>.

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 Illinois Solar for All.

#### ORGANIZATIONAL ELIGIBILITY

The Non-Profit/Public Facilities sub-program allows two paths for satisfying organizational eligibility criteria, including 1) satisfying the definition of Critical Service Provider or 2) demonstrating the required level of community engagement.

The Non-Profit/Public Facilities Basic Information Form includes a Critical Service Provider survey as well as instructions for documenting community engagement. This form is completed according to the path selected.

**Step B1:** The Approved Vendor will ensure the Non-Profit/Public Facilities Basic Information Form is completed, indicating the selected path for verification by Organizational Eligibility, either 1) Critical Service Provider or 2) Community Engagement.

If 1) Critical Service Provider is selected, proceed to Step B2. If 2) Community Engagement is selected, skip to B3.

**Step B2:** Verification as a Critical Service Provider 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 unaccepted.

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

If the response is unaccepted, the Approved Vendor can pursue eligibility through the Community Engagement path.

**Step B3:** The Approved Vendor will ensure the Non-Profit/Public Facilities Basic Information Form is completed, indicating the selected path for verification by Community Engagement. This selected path requires documentation of community engagement demonstrating the applicant institution's engagement with the environmental justice or low-income community being served. Documentation must include both:

- 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.

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 unaccepted.

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

If the response is unaccepted due to missing or incorrect documentation, the Program Administrator may request additional information via e-mail. 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 Illinois Solar for All, the Approved Vendor may formally appeal to the Illinois Power Agency

The Approved Vendor on behalf of the applicant will have 2 weeks to appeal the rejection in writing on company letterhead conveyed by e-mail 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 Low-Income Community Solar projects must provide evidence of community partnerships at the time of Part I project application. A document upload option will be provided for this required element. Document uploads required (only if applicable) include but are not limited to documentation of 100% lowincome subscriber ownership as well as a letter of intent from the intended anchor tenant.

#### SUBSCRIBER ELIGIBILITY

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

**Step 1:** The Approved Vendor will collect a completed Participant Household Basic Information Form and send/upload it to the Program Administrator. This form will include a<u>n applicant's participant</u> certification that they currently qualify based on income eligibility requirements of 80% or less Area Median Income for the household.

### Method DU.S. Dept. of<br/>Housing and Urban Development Qualified Census Tract

**Step D1:** The Approved Vendor will enter the <u>participantapplicant</u>'s household address into the <u>Illinois Solar for All HUD QCT online tool.</u>

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

If the response is unaccepted, the Approved Vendor will move to Method A.

#### Method A

#### Third-Party Qualifying Program Verification

**Step A1:** The Approved Vendor will determine if the participant <u>applicant</u> 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: Credit Bureau 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 unaccepted will be returned to the Approved Vendor within one week.

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

If the response is unaccepted, the Approved Vendor will go to Method B: Credit Bureau Tax Transcript Verification.

Method B

**Credit Bureau Tax Transcript** Verification

**Step B1:** The applicant will certify that they qualify based on AMI using either the current <u>Illinois Solar for All Area Median Income worksheet</u> or the online Illinois Solar for All Area Median Income verification tool and complete the Participant Household Basic Information Form.

If the participant <u>applicant</u> household does meet income eligibility, proceed to Step B2.

If the participant 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 credit bureau third party, Experian, using fax, email, or custom interface (Note: wet or e-signatures via secure email link are acceptable).

**Step B3:** Credit Bureau Experian will provide verification data to the Program Administrator within 24 to 48 hours.

**Step B4:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or unaccepted response to the Approved Vendor.

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

If the response is unaccepted or if the information cannot be provided by Credit Bureau 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 two previous <u>calendar</u> months' earnings for all household members age 18 and over. <u>When using paystubs</u>, <u>documentation for the presence of</u> <u>each household member claimed on the Basic Information Form must be included</u>.

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

**Step C3**: The Program Administrator will compare total household income level to 80% AMI threshold and return an accepted or unaccepted response to the Approved Vendor.

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

If the response is unaccepted due to missing or incorrect documentation, the Program Administrator may request additional information via e-mail. 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 Illinois Solar for All, the Approved Vendor may formally appeal to the Illinois Power Agency.

The Approved Vendor on behalf of the applicant will have 2 weeks to appeal the rejection in writing on company letterhead conveyed by e-mail 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 posession of the Approved Vendor will be destroyed after eligibility is determined.

#### DATA MANAGEMENT AND VALIDATION

Participant Household and Non-Profit/Public Facilities Basic Information Forms contain participant <u>applicants'</u> 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. Data is collected and transferred for each program <u>participant</u> <u>applicant</u>.

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 Low-Income Distributed Generation projects, where multiple <u>household members</u> applicants 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 hardcopy documentation is destroyed by the Approved Vendor within one week of eligibility being determined. The Program Administrator will retain information digitally in compliance with state document retention requirements.

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

Low-Income Community Solar sub-program projects require that a minimum of 50% of the total system size (excluding any share subscribed to by an anchor subscriber) be allocated to qualified low-income households <u>by one year at-after</u> the time of energization. The share of Low-Income Community Solar RECs paid for at the ILSFA Low-Income Community Solar REC price upon energization is determined by the total system share subscribed to by qualified low-income households or a single anchor subscriber that is a Non-Profit/Public Facilities sub-program participant as described in the project eligibility section above. An anchor subscriber that is a non-low-income residential household or a business would have its subscription share receive payment for RECs at the applicable Adjustable Block Program price. <u>A one-time payment for the full contract</u> value, determined on this basis, will be made shortly after energization.

One year after energization, Approved Vendors will submit annual reports for each Low-Income Community Solar sub-program project (as detailed in the Renewable Energy Credit Management section of this manual). These reports will require data for all participants, including changes in share for existing subscribers and share data for new subscribers, along with eligibility verification data for all new subscribers. <u>The quantity</u> of RECs paid for will be adjusted based on subscription shares shown in this Year 1 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 subscriber's share, if any) be allocated to qualified low-income households must be met at this time. The amount of incentive payment will be prorated, and contracts adjusted accordingly, based on the validated share determined by the Program Administrator after annual reporting. 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).

# 7. Marketing and Consumer Protection Requirements

## 7.1. Consumer Protections

In addition to technical system requirements, Approved Vendors in the ILSFA program must work within prescribed guidelines that govern their interaction with the marketplace and potential and actual program participants. Low-income 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 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. Approved Vendors are required to indicate their adherence to these

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.

Consumer Protections for Low-income Distributed Generation

Consumer Protections for Low-income Community Solar

## **7.2.** Program Informational Brochures

To assist Approved Vendors, the Program Administrator has developed a series of informational brochures about the Illinois Solar for All program and sub-programs. Approved Vendors may access and download these brochures at the following links:

- Low-Income Distributed Generation
- Low-Income Community Solar
- Non-Profits and Public Facilities

These informational brochures were developed by the Program Administrator with the Illinois Power Agency and cannot be adapted in any way. All participating Approved Vendors must sign a form acknowledging that they have received these informational 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 Illinois Solar for All 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 informational brochures are presented in a convenient frequently asked questions format to help answer anticipated questions from customers and potential customers. You'll find 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, and location, but it must adhere to Illinois Solar for All content and branding criteria (please see Section 7.4 of this manual) and it must be submitted to and be approved by the Program Administrator 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 informational brochure to the customer at the first point of contact, either in person or online. If the first contact between an Approved Vendor and the customer occurs via telephone or direct mail, the informational brochure should be included at the first (if any) follow-up that takes place in person or online. For projects installed after June 1, 2017 but before these guidelines were published, standard brochures can be presented prior to project submission.

At execution of contract: The relevant informational 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 informational 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 Illinois Solar for All 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 & WORDMARK** 



HORIZONTAL LOCKUP



STACKED LOCKUP



MINIMUM CLEARANCE



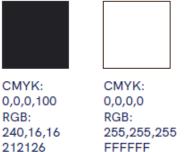


#### ILSFA COLORS

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.







## 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: <u>www.IllinoisSFA.com</u>
- 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
- #ILSolarforAll offers incentives for solar installations for low-income households. Contact us or visit the #ILSFA website to get started: <u>www.IllinoisSFA.com</u>

#### 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
- 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: <u>www.IllinoisSFA.com</u>
- #ILSolarforAll provides incentives for new solar generation systems serving lowincome households. 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 new program: 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 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 incomequalified 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: <u>www.IllinoisSFA.com</u>.

#### GENERAL PROGRAM TALKING POINTS

- Illinois Solar for All provides greater access to the clean energy economy for lowincome communities through incentives that help make solar installations more affordable and results in measurable savings for participants.
- Illinois Solar for All increases participation in solar energy projects serving lowincome and environmental justice communities. Incentives are made available for residential properties, facilities that house 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 environmental justice communities may be eligible for participation.
  - With Illinois Solar for All, 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 the ILSFA program. 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. 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 an incentive program that supports the development of new solar photovoltaic (PV) systems to benefit low-income households and communities in Illinois through the purchase of renewable energy credits (RECs). ILSFA enables the sale of RECs produced by qualified PV systems to Illinois utilities or to the Illinois Power Agency. Payments vary depending on the project type, size of the system, and where it is located.

Examples of statements companies may <u>not</u> 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 the ILSFA program:

- "ILSFA is a state program that provides an incentive for solar PV systems that serve low-income and environmental justice communities."
- "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." (except for multifamily, master-metered buildings)

WHAT ARE RECS AND WHY ARE THEY VALUABLE?

Renewable energy credits (RECs) are created when renewable energy generation systems, including solar panels, generate electricity, but 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 the ILSFA program will receive or use renewable electricity.

Examples of statements companies may <u>not</u> 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 the ILSFA program, 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, the ILSFA program enables the sale of RECs produced by PV systems to both utilities and the Illinois Power Agency, depending on the source of funding.

The ABP will purchase RECs from qualified projects serving any household, business, or other entity. The ILSFA Low-Income Distributed Generation sub-program specifically serves low-income households.

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

#### FINANCIAL BENEFITS

The ILSFA program requires that all qualified 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 Low-Income Distributed Generation 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, say, a 15 year contract, if the energy value is \$15,000, the savings must be at least \$7,500 over that period.
- If a property owner or manager of a qualified multifamily building that installs a Low-Income Distributed Generation 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 <u>not</u> 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 you will pay fees totaling no more than half of whatever electric bill value you receive through the program."
- "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 you will pay fees totaling no more than half of whatever electric bill value you receive (at the time of initiating the subscription) through the program."

#### ENVIRONMENTAL JUSTICE COMMUNITY DESIGNATION

ILSFA sets a goal of allocating no less than 25% of incentives to projects located in environmental justice communities across the state. The designation of environmental

justice communities is done using a method prescribed in the Long-Term Renewable Resources Procurement Plan.

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

Further, households that reside within a designated environmental justice community are not automatically qualified to participate in ILSFA because of this designation. Households must still qualify based on income.

Approved Vendors or their agents and subcontractors will not state that customers will qualify for ILSFA based on residing in an environmental justice community, 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: <u>https://www.illinoissfa.com/environmental-justice-communities/</u>

#### USE OF UTILITY NAME AND LOGO

All marketing materials that incorporate language or materials specific to Illinois Solar for All produced by the Approved Vendor or their agents and subcontractors must be submitted to the Program Administrator for review upon request. *Illinois Solar for All Informational Standard Brochures cannot be adapted and must be presented to customers per the guidelines in this manual.* 

An Approved Vendor or its agent shall not use the name or logo of a public utility, 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, a utility, the ICC, the IPA, or the Program Administrator. For avoidance of doubt, an Approved Vendor can state the fact that it is an Approved Vendor under the IPA's Illinois Solar for All program.

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.

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. The Approved Vendor must agree to make changes to marketing materials as requested by the Illinois Power Agency 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 materials, printed or digital, produced by an Approved Vendor must be submitted for review.

All marketing materials should be submitted for review at least three weeks or sooner before the projected "go to print" date.

Please note that the review may be subject to recommended modifications to the materials, which may affect your "go to print" date and your planned distribution date.

The following materials require review:

- All marketing and promotional materials
- Materials produced outside of the resources made available through the program
- Promotional items

Materials for review may be submitted via email. Send design files (marketing materials) or mock up proofs (promotional items) to marketing@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 acting or has not acted in compliance 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.

After a review of any such response, the Program Administrator will determine what discipline, if any, should apply to the Approved Vendor. The Program Administrator will also provide a copy of the determination to the IPA. The Program Administrator's determinations of discipline may be appealed to the IPA, and the opportunity to appeal (as well as a deadline by when such appeal should be made) will be communicated by the Program Administrator as part of its determination of discipline.

To appeal 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 Approved Vendor 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. 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 Low-Income Distributed Generation or Nonprofits/Public Facilities projects) or subscription contracts (for Low-Income Community Solar projects). Approved Vendors will be required to attest that these contract requirements were satisfied, at the time of submitting a Part I application (for Low-Income Distributed Generation or Nonprofit/Public Facilities projects) or a Part II application (for Low-Income Community Solar projects). The IPA and Program Administrator reserve the right to request copies of these contracts.

- Distributed Generation (Installation) Contract Requirements
- <u>Community Solar (Subscription) Contract Requirements</u>

# 8. Project Submission Processes

## 8.1. Project Submission Process Overview

Note that this project submission process has been established for the 2018-2019 and 2019-2020 program years and will commence at program launch with annual funding being allocated accordingly. Subsequent program years may follow different processes or timeframes as determined by market uptake for each sub-program. 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 30-day project submission time window for Low-Income Community Solar and a 45-day project submission window for Low-Income Distributed Generation and Non-Profits/Public Facilities for the program year. Projects are submitted in batches of at least 50 kW, as further detailed below. Completed disclosures, system design information, as well as income verification details for Low-Income Distributed Generation 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. 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 in qualified batches according to the requirements and processes outlined below. 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.

### 8.2. Disclosures

Approved Vendors must complete and provide standard disclosure forms to each program participant prior to contract execution. The ILSFA Low-Income Distributed Generation 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
- <u>Non-Profit/Public Facilities Disclosure</u>

A completed disclosure form is required for submission of a Part I application. The disclosure form must be generated using the disclosure form system within the Approved Vendor portal at <u>www.IllinoisSFA.com</u>. 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 signed by the participant. The information from the disclosure form is automatically transferred to the application portal to start a Part I application for Distributed Generation 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 disclosure form is to be completed after system design and must be delivered to the customer before the contract is signed. Low-Income Distributed Generation disclosures must be delivered at least seven calendar days prior to the contract being signed. 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. Terms of the underlying contract between a customer and an Approved Vendor or its subcontractor must be consistent with the contract disclosure form. Any statements made verbally must be consistent with the contract and the disclosure form.

If a Distributed Generation system was energized or went under contract prior to the Agency's finalization of the ILSFA Low-Income Distributed Generation Standard Disclosure Forms on May 15, 2019, the Approved Vendor will be required to complete the disclosure form and send it to the customer for signature. Approved Vendors will have an opportunity to attest, in lieu of obtaining the system host's signature on the disclosure, that its diligent, good-faith efforts to contact the customer using all known contact information were either unsuccessful or resulted in the customer refusing to sign the disclosure.

### 8.3. Batches

Applications will be completed on a project-by-project basis. However, applications can only be submitted in a batch which must consist of at least 50 kW and no more than 2

MW of aggregate nameplate capacity from one or more projects. Once an Approved Vendor has at least 50 kW of Part I applications complete, the Approved Vendor can select projects to become part of a batch to submit to the Program Administrator for approval once the 30-day project submission window has commenced. 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 in the batch 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. Batches will be approved if at least 75% of the initially submitted capacity of the batch is approved by the Program Administrator.

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 ILFA Program Administrator, the ILSFA Program Administrator will forward the batch to Adjustable Block Program Administrator who will manage the REC contracting process for all Illinois Solar for All projects and assign the batch (less any projects not approved) to a utility or the IPA (depending on the source of funds) and prepare the confirmation information related to that batch (and master contract information if it is the Approved Vendor's first batch). After project selection, batches that are less than 75% of the submitted batch size will be approved.

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. 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 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)
  - o Low-Income Community Solar
  - Non-Profits/Public Facilities
- Ground- or roof-mounted
- Technical project information
  - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking)
    - Array information (number of modules, module power rating, tilt, and azimuth) for each array
    - Inverter size in continuous AC output, which must be equal to or less than nameplate capacity
    - Inverter efficiency
    - System size in DC and AC will be calculated by the portal from the information provided above
  - PDF output of system design (Helioscope, Aurora, etc.)
  - PDF output of Shading Analysis
  - Estimate of first-year energy production
  - o Document Upload: Site Plan
  - Document Upload: Structural Plan
  - o Document Upload: One Line Drawing
- Customer Data
  - Document Upload: Customer Contract (DG and NP/PF only)
  - Customer contract term start/end date
  - Income verification for all income-eligible participants
- For Low-Income Distributed Generation
  - Income verification
- For Non-Profits/Public Facilities
  - o Project site location in low-income or environmental justice community
  - Documentation establishing organization type as non-profit and public agency
  - Proof of site ownership by public agency participants
  - Documentation that the organization is a critical service provider or can demonstrate 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
  - Share of low-income household subscribers
  - Non-qualifying share
  - o Small subscriber share (applies only to low-income household share)
  - o 100% subscriber-owned status, description, and supporting documentation
  - Proof of site control
  - Document Upload: Community Partnership Description
- Other required uploads
  - Signed disclosures (wet signatures) not completed through the application portal
  - Plot diagram or site map for all systems
- For projects 25 kW or larger
  - o Interconnection agreement or demonstration of re-application
  - o Proof of satisfying non-ministerial permit requirements
- Requirements for systems already energized prior to application
  - o GATS or M-RETS unit ID
  - Document Upload: Certificate of Completion of Interconnection
  - Document Upload: Net Metering Application Approval Letter (if applicable)

Project applications are submitted via the online vendor portal, including data entry and document uploads. Project-level review commences when a batch of at least 50 kW 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. If the sub-program budget is less than 100% subscribed at the end of the project submission window, all eligible projects in that sub-program will be approved. If the sub-program is more than 100% subscribed, all eligible projects in that sub-program will be included in the selection process. Projects deemed eligible and then selected by the IPA following Part I submission and subsequently approved by the ICC will be contracted with the utility or 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
  - $\circ~$  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
  - $\circ$   $\,$  Provide the name on the PJM-GATS and M-RETS account
  - o Provide proof of accepted irrevocable transfer agreement
- For community solar only
  - Anchor share at energization
  - Anchor type at energization (non-profit, public facility, other)
  - Share of low-income household subscribers at energization
  - Non-qualifying subscriber share at energization
  - Small subscriber share at energization (applies only to low-income household subscribers)
- Financing structure (customer-owned, lease, or PPA) (not asked for community solar)
- Document Upload: Certificate of Completion signed by the utility
- Document Upload: Net Metering Approval Letter (if applicable)



- Installer information (must match the name of a current ICC Certified DG Installer)
- Job training data (hours, work categories, and qualified program details for all qualified trainees as well as estimated total employee work hours by work category)
- Attestation of compliance with all marketing guidelines published by the Agency for marketing activity that occurred after November 26, 2018
- Attestation that the contract with the customer is consistent with the disclosure form provided to the customer
- Attestation of compliance with all DG installation contract requirements or community solar subscription requirements previously published by the Agency (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for DG contracts executed before May 15, 2019 were unsuccessful)
- Final system cost

Variations in final system size 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. If the 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

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**

A project that is not completed in the time allowed (plus any extensions granted, as described further below) 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/kW extension fee for distributed generation 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/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 Agency may also, but is not required to, approve additional extensions for demonstration of good cause. The Agency 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

When the Illinois Solar for All program opens for project applications for any given program year, a 30-day project submission time window will commence for Low-Income Community Solar and a 45-day project submission time window will commence for Low-Income Distributed Generation and Non-Profits/Public Facilities to allow Approved Vendors to submit their proposed projects.

Following the initial application window for the 2018-2019 program year (beginning May 15, 2019), new applications will not be accepted. Following the subsequent 2018-2019 project selection process for applications submitted in the initial time window, there may be unused 2018-2019 budget in one or more sub-programs. In any sub-program, any 2018-2019 program year funds unused at this point will be rolled over as an addition to the 2019-2020 program year annual budget already set in the Plan.

For the 2019-2020 program year project selection cycle (to occur in the latter part of calendar year 2019), if eligible projects submitted during the project submission window have an aggregate REC value less than 100% of the sub-program budget for the program

year, project submissions will be re-opened with eligible projects being approved on a first-come, first-served basis until the earlier of 1) the end of the 2019-2020 program year or 2) when the Program Administrator announces that all annual sub-program funds have been fully allocated.

The document linked here outlines the proposed project selection protocol for either of the 2018-2019 or 2019-2020 program years, describing how projects will be selected for ILSFA REC contracts should project applications received for a given sub-program exceed that sub-program's available annual funding after the close of the project submission window.

#### <u>Project Selection Protocol</u>

Issues regarding the project selection protocol for the 2020-2021 and possible future program years will be determined by the Illinois Commerce Commission's approval of the Plan update in the fall of 2019.

## **10. System Requirements**

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

A complete description of the Illinois Solar for All program can be found in the IPA's Long-Term Renewable Resources Procurement Plan.

Illinois Solar for All 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). 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 installations may also be subject to local ordinances, regulations, or codes. The Illinois Solar for All 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 Illinois Solar for All projects, the PV system installer must have a current <u>Distributed Generation Installer certification from the ICC</u>.



## **10.3. System Location**

All systems must be entirely located in Illinois and interconnected to the distributionlevel electrical grid of an Illinois investor-owned utility or Illinois electric cooperative or municipal electric system. Off-grid systems are not eligible for the Illinois Solar for All program. 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.

### **10.4. Interconnection Date**

All 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 Illinois Solar for All program, certain conditions must be met to meet program requirements related to consumer protections and customer contracts. Please review those documents/sections for details on satisfying those requirements.

## **10.5. Installer Requirements**

While using a Qualified person for installation is not required by Illinois Solar for All, the ICC requirements for using a Qualified person for Distributed Generation projects still applies. Low-Income Distributed Generation projects must therefore be installed by a company with a current <u>Distributed Generation Installer certification</u> from the Illinois Commerce Commission.

As such, every installation of a distributed generation facility 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 distributed generation 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 Boardapproved 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 distributed generation technology for which the qualification status is sought.

## **10.6. Expansions**

An expansion to an energized system that is already under an Illinois Solar for All 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 independent from the contract of the original system. The expansion must comply with all program rules in effect at the time the expansion application is submitted. Expansions are subject to the following additional requirements:

- 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 Illinois Solar for All 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.

## 10.7. Co-location

#### CO-LOCATION OF DG PROJECTS

The total capacity of distributed generation systems enrolled in the Illinois Solar for All 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 on the same parcel will be considered a single system 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-PROFITS/PUBLIC FACILITIES PROJECTS

Non-Profits/Public Facilities projects that are co-located shall follow the same requirements as the co-location of distributed generation projects.

#### CO-LOCATION OF 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 summing to 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, on one parcel; 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.
- 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.
- 6. Projects owned or developed by separate entities (meaning that 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.

## **10.8. Site Control**

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.

## 10.9. 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).

## 10.10. 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

## **10.11. 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>3</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 to the nearest whole REC for the 15-year contract REC delivery amount. 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
    - 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

<sup>&</sup>lt;sup>3</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.

- 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.
- 4. The 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 asbuilt 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 the project is still eligible for the standard capacity factor based on its updated shading criteria, azimuth, and tilt 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 a custom capacity factor was used at the Part I application stage, the same custom capacity factor will be used and applied to the Part II system size. Switching among production estimate calculation methodologies between Part I and Part II is not permitted.
- 7. All projects require the submission of a PDF output of the system design, including the shading study.

## 10.12. System Size

- 1. All system sizes described in this manual are AC system size based on the 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.
- 2. Systems will be limited to a DC capacity of 150% 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.

## 10.13. 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 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.

## **10.14. 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 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 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 during the initial stages of program launch with the hope of developing manageable standards for allowing participation from DC-only systems prior to the update of the IPA's Long-Term Renewable Resources Procurement Plan in the second half of 2019.

### 10.15. Metering

- 1. Systems registered in M-RETS must utilize an ANSI C.12 certified revenue quality meter.
- 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.

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)

#### TABLE 10.1. METERING REQUIREMENTS

## **10.16. 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 subscriber 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. Approved batches will be wholly funded by one or the other source, with RERF funding being prioritized by the Agency until an annual sub-program RERF budget (approximately \$4.5 million for Low-Income Distributed Generation, \$7.5 million for Low-Income Community Solar, and \$3 million for Non-profits and Public Facilities) is exhausted. RERF-funded projects require contracting for REC purchases between the Illinois Power Agency and the Approved Vendor. Projects funded by utility-held funds require contracting for REC purchases between an Illinois utility 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 established the agreed framework for contracting and delivering RECs across multiple contracts and projects.
- The REC Contract is the agreement representing a batch of projects contracted for delivery between counterparties. The REC Contract may contain one or more Product Orders.
- 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 REC Contract.



#### 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 one week prior to each meeting.

When the Adjustable Block Program Administrator submits contract 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 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. The Approved Vendor will then be required to sign the REC contract within seven business days of receiving it.

#### FAILURE TO EXECUTE THE CONTRACT

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

#### COLLATERAL

Following Commission 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, based on the capacity factor and system size proposed in the Part I application, including any small subscriber commitment adders to the REC price. 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 counterparty utility. For a system already energized at the time of ICC approval, as an alternative to posting collateral, the Approved Vendor may request that the 5% collateral requirement be withheld from the first REC payment.

#### **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



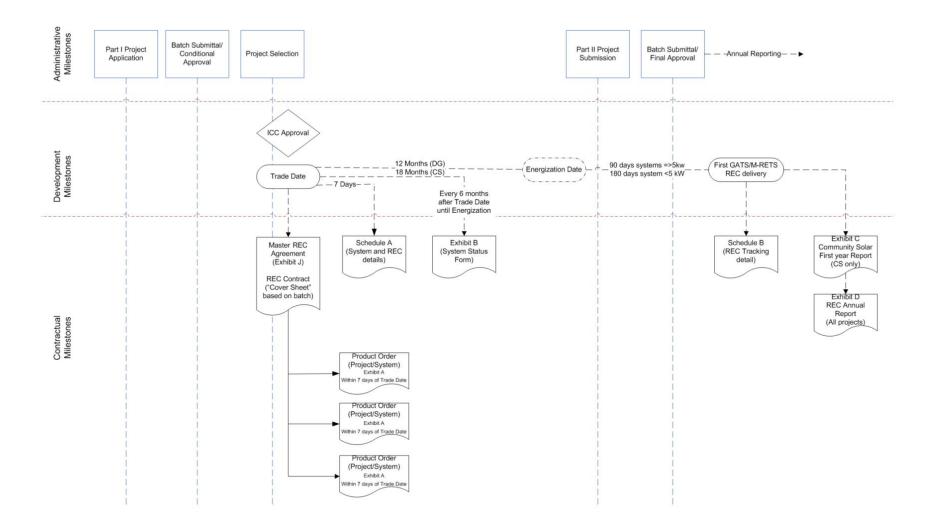
kW, 180 days for the first REC delivery will be allowed. The 15-year delivery term will begin in the month following the first REC delivery and will last 180 months.

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.



#### 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**

- Low-Income Community Solar 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 Low-Income Community Solar:
  - Anchor subscribers
    - A single Anchor Tenant that is a Non-Profit/Public Facility
    - A single Anchor Tenant that is not a Non-Profit/Public Facility
  - 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 25 kW or less as compared to the total system nameplate capacity.
- A single anchor subscriber that is not a low-income household (as defined below) will be allowed. The anchor subscriber's share will receive the applicable Adjustable Block Program REC price, unless it is a non-profit organization or public facility, in which case the RECs associated with its subscription share will be purchased at the ILSFA Low-Income Community Solar price. The anchor subscriber must be identified at the time of the Part I application.
- Other than the anchor subscriber, 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 subscriber's share, must be allocated to low-income subscribers by one year after the time of energization (e.g., if the anchor subscriber'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 subscription) will not be included in the contract, will receive no REC payments, and will not be delivered to the utility or Agency.

• Community solar projects shall update these percentages at the end of the first year for fixing the final contractual value. Low-Income Community Solar projects shall subsequently update these percentages 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 the Annual Reporting section 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 <u>https://www.pjm-eis.com/getting-started.aspx</u>. Detailed information for M-RETS can be found at <u>https://help.mrets.org.</u>

## **11.6. Assignment of REC Contracts**

REC delivery contracts entered into under the Illinois Solar for All 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 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 may not be made within a) 30 business days of contract execution (or the posting of collateral, whichever is later) or b) 30 business days of a prior assignment of the same batch or same master agreement. 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. 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.

## **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 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 purposes of calculating assignment fees, both the initial assignment post-default and the second assignment within 180 days constitute a single assignment.

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 Evaluation**

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>4</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 www.IllinoisSFA.com. The Annual Report will serve as the basis for verifying that the RECs from projects are being delivered to the applicable counterparty, and, absent corrective actions taken by the Approved Vendor, can be a tool used to determine what actions may be taken by the utilities/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 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
- Information on consumer complaints received
- Status of identified inspection/installation deficiencies

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

<sup>&</sup>lt;sup>4</sup> An Approved Vendor may request for a system's annual REC delivery obligations to be reduced in midcontract. 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.

## **12.2.** Considerations for Community Solar Projects

#### INCLUDED IN THE ANNUAL REPORT FOR COMMUNITY SOLAR

The following are items that must be included in the annual report for Community Solar:

- 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 turn-over 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, if the subscriber meets the requirements of a small subscriber, 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 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 Illinois Solar for All program and, if there are underperformances, coordinate with the applicable utility on drawing on collateral. That process is described below.

#### ESTABLISHING AND REPORTING SUBSCRIBER SHARES

At energization, the community solar project shares will establish the basis for project approval at Part II project application. At energization, the anchor tenant must be



identified, including their share in kW and whether they qualify as a Non-Profit/Public Facility. 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 subscriber 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 subscriber 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 basis for the REC delivery contract. Subscriber types will each receive different consideration for REC payments, with:

- The Anchor Tenant receiving the applicable Adjustable Block Program REC value, except for Non-Profits/Public Facilities anchors who will receive the ILSFA REC value,
- 2. Qualified low-income households receiving the applicable ILSFA REC value, and
- 3. All other subscriber not included in the REC contract and RECs are not delivered.
- 4. 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 contact 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 Contracts 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 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 subscriber 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 anchor subscriber 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 Low-Income Community Solar 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. Underperformance and Surplus RECs**

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>5</sup> which is a single surplus REC account for the entire contract. Surplus RECs can be banked forward indefinitely, if unused, until the end of the final delivery term in the REC contract<sup>6</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>7</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.

Starting at the end of the third full delivery year after the date of energization, a threeyear 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.

<sup>&</sup>lt;sup>5</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 utility when generated and then retired.

<sup>&</sup>lt;sup>6</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>&</sup>lt;sup>7</sup> This refund procedure would not apply to prior collateral drawdowns based on annual community solar system parameters.

## **12.4.** Collateral and Performance Evaluation

Five percent collateral (as a percent of 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 batches and systems for a given Approved Vendor. Underperformance by any system in either of those categories can trigger a collateral drawdown for a 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 additionally choose which form of collateral shall be drawn upon.

Within 90 days after any collateral draw, the Approved Vendor will be required to post additional collateral to top up its total collateral, to equal five percent of 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 Low-Income Community Solar 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), 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.

# **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. For all Illinois Solar for All 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, 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. 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 applicable to the actual nameplate capacity under the ABP (or ILSFA if such an anchor tenant is a non-profit or public-sector facility) at the time of energization; and 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 the proposed nameplate capacity or the actual nameplate capacity as well as 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.

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. 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.

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

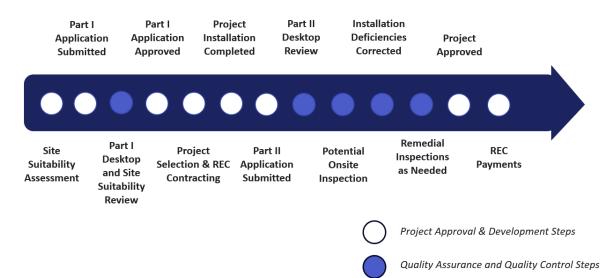
- Most recent quarterly netting statement provided by the Program Administrator to the Approved Vendor
- Invoice amount;
- Cumulative amount already received by the Approved Vendor under the REC contract;
- Maximum allowable payment, as indicated in the most recent quarterly netting statement; and
-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

# 14. Inspections

## 14.1. Quality Assurance Overview

The ILSFA Program Administrator will develop and implement a process for quality assurance, including photo documentation at Part I and Part II project submission and onsite inspections of a random sample 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. 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. All requirements of the Site Suitability Guidelines are validated for every ILSFA installation. 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 as part of the Site Suitability Report. Projects submitted that do not meet these requirements and have not submitted 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 identify site conditions that are considered barriers to the installation of both rooftop distributed generation and ground-mounted PV systems participating in the Illinois Solar for All 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 low-income 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 document linked below is the Site Suitability Guidelines, which describes these requirements in full and serves as the form to be completed with each site assessment.

• <u>Site Suitability Guidelines</u>

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 Illinois Solar for All 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

- ✓ Photos showing the overall roof condition
- ✓ Photos of the roof components
- ✓ Photos showing the condition of the electrical panel
- ✓ Photos showing work areas are clear of hazardous materials
- ✓ Photos showing conditions of ground mount site (ground mount only)

#### SHADING

- ✓ Photos showing proposed array location
- ✓ Photos showing potential obstructions



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	OTHER ELECTRONICS
<ul> <li>✓ Inverter Information (1 Photo for each model, must show model number)</li> <li>✓ DC Disconnect (1 Photo)</li> <li>✓ DC Combiner Box (1 Photo if installed)</li> <li>✓ AC Combiner Panel (1 Photo if installed)</li> </ul>	<ul> <li>✓ Project (Photo(s) showing all installed modules)</li> <li>✓ Module information (1 Photo for each model, must show model number)</li> <li>✓ Meter (1 Photo if installed, must show cumulative life time meter reading)</li> <li>✓ Battery Storage (3 Photos if installed)</li> </ul>

#### **GENERAL ELECTRICAL (ARRAY)**

- ✓ Grounding (1 Photo)
- ✓ Exposed Wire Management (1 Photo)

#### INTERCONNECTION

✓ Load Side Connection (3 Photos)

or

✓ Supply Side Connection (2 Photos)

# STRUCTURAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

#### ANGLED ROOF

- ✓ Mounting System Anchoring (1 photo)
- ✓ Flashing Techniques (1 Photo)

#### FLAT ROOF

- ✓ Mounting System Anchoring (1 Photo if installed)
- ✓ Flashing Techniques (1 Photo if Installed)
- ✓Tilt angle (1 photo)

#### **GROUND MOUNT**

✓Tilt angle (1 photo)

#### GENERAL STRUCTURAL

✓ Mounting System (1 Photo)

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

#### SHADING

✓ Array Clear of Obstructions (1 photo)
 ✓ Obstructed Array Sections (Photos as needed)

#### 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 have 1) 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 ILSFA and they 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 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.

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:
  - $\circ$  100% of first five installations will be inspected onsite
  - o 30% of next ten installations will be inspected onsite
  - o 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 distributed generation 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	connect Grounding	
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 Inspectio
Microinverters and ACMs	Design requirements	Ballast Mount
Load Side Interconnection	Components and equipment	Tracking Mount
Supply Side Interconnection		

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

Battery Storage



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 their representative is available to accompany them during the inspection. The Program Administrator Inspector will then complete the onsite inspection in accordance with the requirements checklist. Being selected for onsite inspections 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 Illinois Solar for All program requires that Approved Vendors include job training opportunities across their portfolio of projects annually. To meet this requirement, Qualified Job Trainees will perform work on ILSFA projects at a prescribed minimum percentage of total hours worked across all Approved Vendor projects annually. Approved Vendors will track the work of these trainees as well as all employees of their company and those of all subcontractors, Designees, and agents working on their ILSFA projects.

There are two categories of job training requirements: 1) annual job training requirements across all ILSFA projects and project types and 2) annual job training requirements for Low-Income Distributed Generation projects.



#### PORTFOLIO REQUIREMENTS

The portfolio requirements prescribe that cumulative annual installations across an Approved Vendor's entire portfolio of ILSFA projects include a minimum percentage of work hours performed by qualified trainees. To ensure this minimum percentage is met, work hours for all employees of Approved Vendors, their subcontractors, and installers will be collected. The required percentage of qualified trainee work hours increases annually for each of the first three years as shown in the table below.

Approved Vendor Program Year	Cumulative Job Training Requirement
1	10% of the hours worked on projects performed by job trainees
2	20% of the hours worked on projects performed by job trainees
3 and beyond	33% of the hours worked on projects performed by job trainees

TABLE 15.1. PORTFOLIO REQUIREMENTS	IT S
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#### LOW-INCOME DISTRIBUTED GENERATION REQUIREMENTS

The Low-Income Distributed Generation requirements prescribe that 33% of all installations for one- to four-unit and five or more-unit distributed generation projects annually include at least one qualified trainee. Work hours for all employees of Approved Vendors, their subcontractors, and installers will be collected in the same way. However, no minimum hours per project or cumulatively are prescribed for this requirement, only that a minimum percentage of projects meet the requirement.

#### ILLINOIS COMMERCE COMMISSION REQUIREMENTS

While ILSFA projects are exempted from the requirement of using a qualified person for all installations, the ICC rule for Distributed Generation still applies. This rule requires that every installation of a distributed generation 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.

#### 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 or their subcontractors/installers must pay job 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.
- The Approved Vendor or their subcontractors/installers insurance must cover the employment of the job training hires, including temporary hires.
- The Approved Vendor or their subcontractors/installers must track the work hours of job trainees and any other employee performing work on each ILSFA project.
- The Approved Vendor must submit the completed Job Training Affidavit to the Program Administrator for each project upon Part II project approval submission. The affidavit identifies the names of the eligible job training program and job trainee(s) used for each project as well as 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 job trainee(s) must complete and sign this affidavit after the trainee's time on the project is completed. See the data collection requirements in this section and the Affidavit form.
- Failure to meet the job training requirements can affect the Approved Vendor's qualified status for Illinois Solar for All. Failure to meet a single year's target will lead to a probation 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.
- 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 12.4.

#### APPROVED VENDOR ANNUAL REQUIREMENTS CALENDAR

The calendar year measuring the start of job training requirements begins either 1) at the date of achieving Approved Vendor status, or 2) at the date of program launch

(project submission launch), whichever is later. All projects receiving Part I project approval during the year starting on that date will be counted towards the goal for that performance year. If project development occurs over multiple performance years, the hours for that project will be included in the performance year that Part I approval for that project was awarded. This is especially important for large projects and community solar projects, where development timelines can extend beyond a year. For example, if a project was approved in January of the first year, but completed in June of the second year, the hours will count towards the first year and be required to meet the 10% portfolio requirement.

All Single Project Approved Vendor projects must meet the job training requirement of 10% of all hours being performed by qualified 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 Contractor Accelerator program, or Other Qualifying Programs. Qualified Job Training Programs include those programs described in Section 16-108.12 of the Public Utilities Act and approved in ICC Docket No. 17-0332, otherwise known as the 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.



See the Illinois Solar for All website at <u>www.IllinoisSFA.com</u> for more details of current eligible job training programs along with other job training and workforce development resources.

#### OTHER QUALIFYING PROGRAMS

Illinois Solar for All Approved Vendors may also request to use Job Trainees from an Other Qualifying Program so long as they can demonstrate that completion of the job training program would lead to the trainee becoming a qualified person under the <u>ICC</u> <u>Rule 461.10</u> related to the certification of installers of photovoltaic systems. The <u>ICC</u> <u>Rule 461.10</u> provides training categories that lead to qualified person status in Illinois in one of the following categories:

- An apprenticeship as a journeyman electrician from a USDOL-registered or an applicable state-agency-registered electrical apprenticeship and training program
- An electrical training program for in-house employees established and administered by an electric utility regulated by the ICC
- An associate in applied science degree from an Illinois Community College Boardapproved community college program in solar generation technology
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program

To qualify as a job trainee for an ILSFA project, a trainee will have completed 50% or more of the classroom requirements for one of the programs above through an Illinoisbased Other Qualifying Program as defined above or have graduated from a FEJA-funded training program. Typically, the path toward a NABCEP Certification may include taking classes from multiple training providers. An Other Qualifying Program for NABCEP will be one that provides the training and/or experience that allows a trainee to complete 50% of the qualifications they need, as outlined by NABCEP, to qualify for a certification examination in one of NABCEP's distributed generation technology certifications, specific to photovoltaics.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the trainee on an individual basis. For journeyman apprenticeship, in-house utility, or associate degree programs, required documentation will include proof of enrollment and curriculum for the program. For NABCEP qualified programs, documentation will include proof of enrollment and curriculum for each classroom module, excluding OSHA 10.



When using job trainees from an Other Qualifying Program, 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 Other Qualifying Program.

### QUALIFIED JOB TRAINEE

To qualify as a job trainee, individuals will have completed 1) a qualified, FEJA-funded job training 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 for an Illinois-based Other Qualifying Program within the past 24 months. For FEJA Workforce Development Programs that graduated trainees in 2018 or early 2019 (prior to the formal launch of Illinois Solar for All), 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 training program.

Contractors who have already begun training in a FEJA job training program prior to ILSFA program launch will be able to retroactively submit for two designated trainees. The Program Administrator will coordinate with FEJA training 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 job training program providers 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 trainees qualifying through an Other Qualifying Program. For journeyman apprenticeship, in-house utility, or associate degree programs, required documentation will include proof of enrollment, documentation of completed coursework, and a curriculum description for the program. For NABCEP qualified programs, documentation will include proof of enrollment, documentation of completed coursework, and curriculum for each classroom module.

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

The trainee(s) may participate in Illinois Solar for All 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.

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

System Design	Installation	System Commissioning	
<ul> <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> <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> <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>	

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



Operations/Maintenance		
<ul> <li>Preventative maintenance</li> <li>Corrective maintenance</li> <li>System monitoring</li> <li>Component testing</li> <li>Component replacement</li> </ul>		

The work of the trainee(s) can be on or off the project site but must be specific to the Illinois Solar for All project address. The contractor's insurance must cover the job trainee(s) and the wage is set by the contractor. There should be no functional difference of the wages paid to an eligible trainee and wages paid to an equivalent employee within the first two years of employment.

## 15.3. Data Collection

### THE AFFIDAVIT PROCESS

The ILSFA Job Training Affidavit must be completed for each ILSFA project. The affidavit includes information about all employees working on ILSFA projects, the categories of work performed, and the number of hours for each. The affidavit 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 affidavit shall be accessible to the Program Administrator upon request for up to four years after the submission of the affidavit.

### APPROVED VENDOR ANNUAL TRACKING

Hours must be documented for all employees from Approved Vendor or subcontractors/installers 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 DISTRIBUTED GENERATION REQUIREMENTS

To meet the requirements of the distributed generation job training requirements, Approved Vendors must demonstrate that 33% of all Low-Income Distributed Generation projects include hours for Qualified Job Trainees. This requires that data for each DG project is captured via the Job Training Affidavit, with the DG requirement measured for each project as well as across the DG portfolio. 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 or distributed generation.

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 at <u>www.IllinoisSFA.com</u>. The Program Administrator can direct the Approved Vendor and/or their subcontractor/installer to resources, contacts, hiring events, and more. The Approved Vendor is expected to proactively seek help early.

### WAIVER APPLICATIONS AND GOOD FAITH EFFORTS

The waiver application 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 to meet the job training requirements. Waivers will be considered on a case-by-case basis. Each waiver application will come to a determination of pass or fail based on these responses and associated documentation.

- Did you have ILSFA Qualified Job Trainees currently on staff?
- Do subcontractors/installers you have worked with in this performance year who currently have Qualified Job Trainees on staff?
- Did you include the ILSFA goal in your subcontract agreements?
- 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?
- Did you provide a clear explanation of the work opportunity to attract Qualified Job Trainees?
- Did you contact employees to gain referrals of Other Qualifying Training Programs?
- Did you invite subcontractors/installers with Qualified Job Trainees to bid for this project?



- Were efforts made to seek out Other Qualifying Training programs for Qualified Job Trainee availability?
- Were Qualified Job Trainees employees of your firm previously but not currently?
- Have you interviewed Qualified Job Trainees for positions at your firm?
- Which community organizations and other channels did you contact to solicit Qualified Job Trainees to fill training positions?
- Did you advertise ILSFA Qualified Job Trainee employment opportunities in outlets known to be accessible to 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 Job Training Requirements 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.

## **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. 20% 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, qualified 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, qualified 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 they are currently on a probationary status, may lead to that Approved Vendor being suspended from the program.

## **16. Complaint Management**

As mentioned in the consumer protection guidelines for ILSFA projects, low-income 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, the installation and maintenance, the warranty, billing, or customer service. If the issue cannot be resolved, the participant may contact the Illinois Solar for All Program Administrator by emailing info@IllinoisSFA.com or by calling 1-888-970-ISFA (4732). Approved Vendors shall notify their Vendor Manager of any unresolved complaints.

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 also contact the Illinois Attorney General's office by calling one of the following hotlines:

Chicago	Springfield	Carbondale	
800-386-5438	800-243-0618	800-243-0607	
TTY: 800-964-3013	TTY: 877-844-5461	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 can greatly reduce the number of participant complaints.

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 should 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 Manger will contact the Approved Manager to discuss appropriate resolution.

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

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)	

TABLE	16.1.	INCIDENT	ТҮРЕ	AND	REPORTING	TIMEFRAMES
		INCIDENT				1 21121 10/01/20



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 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**

With respect to information submitted by Approved Vendors into the Illinois Solar for All program, the IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in the Illinois Solar for All 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 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), Approved Vendor submittals, including quarterly reports, 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 Illinois Commerce Commission 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 ILSFA website at <u>www.IllinoisSFA.com</u>.

The manual will be periodically updated both as the program changes and as additional questions and issues arise. Minor updates to the manual will be made by the IPA in consultation with the Program Administrator on a regular basis. Such changes will be announced on the ILSFA website at <u>www.IllinoisSFA.com</u>; the version of the manual published there will always be the latest version.

Changes to manual versions will be redlined and indicated by alternate version numbering. A summary of changes will be provided with any subsequent version as well.

# 19. Appendix

## **19.1. 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 461 of the Illinois Administrative Code where "qualified person" is defined to best assist them in finding Other Qualifying Programs 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 page: <u>www.IllinoisSFA.com/Job-Training/</u>.
  - This page will contain updated lists of FEJA Workforce Development Programs and Other Qualifying Programs 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 <u>NABCEP website</u>.



- NABCEP PV Certification Job Task Analysis (JTAs)
  - <u>Photovoltaic Specialists Job Tasks Analysis</u> (Photovoltaic Design, Photovoltaic Installer, Photovoltaic Commissioning and Maintenance)
  - <u>PV Installation Professional Job Task Analysis</u>
  - <u>PV Technical Sales Job Task Analysis</u>
  - <u>PV System Inspector Job Task Analysis</u>
- Learn about Part 461 and the definition of a qualified person.
  - Approved Vendors will need to know what a qualified person is, per Title 83, <u>Part 461</u> 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 <u>Strategies for Solar Workforce Development Toolkit</u> (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. These two staff would be their 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 Other Qualifying Programs 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.