

Illinois Solar for All Project Selection Protocol Request for Stakeholder Comments

JANUARY 19, 2021

The Illinois Solar for All (ILSFA) Program Administrator and the Illinois Power Agency (IPA) (collectively, the Program Team) are requesting stakeholder comments on the proposed Project Selection Protocol for Program Year 2021-2022 (PY4). The Project Selection Protocol is triggered when applications in the initial project submission window exceed the available annual funding for a given ILSFA sub-program. PY4 officially begins June 1, 2021, and the exact timelines for the project submission windows for PY4 will be announced in the coming weeks on the ILSFA website and through stakeholder emails and newsletters.

Specific questions on which feedback is sought are found below. Commenters need not respond to every question and should not feel limited by these questions in providing feedback. Comments are welcome from both stakeholders in ILSFA as well as from other interested parties.

In general, responses will be made public and published on the ILSFA website (IllinoisSFA.com). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions. Independent of that designation, if the Program Team determines that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions.

The draft Project Selection Protocol is posted at IllinoisSFA.com/Announcements. The draft is presented as redline of changes from the PY3 protocol and reflects edits for clarity, including definitions for Anchor Tenant and Project Host.

Responses are due by Tuesday, February 16, 2021 and should be sent to comments@IllinoisSFA.com.

LOCATION CRITERIA

The ILSFA team conducted an analysis of the selected Low-Income Community Solar and Non-Profit/Public Facilities projects from PY1, PY2, and PY3 to assess their allocation in Environmental Justice Communities (EJCs) and/or Low-Income (LI) Census Tracts and counties. The Project Selection Protocol was used in all three program years for the Low-

Income Community Solar sub-program but was only necessary for the Non-Profit/Public Facilities sub-program in PY3. This analysis was conducted in response to a request from a group of stakeholders to evaluate if the selection criteria used during ILSFA's Project Selection Protocol aligns with the program goals of incentivizing solar investment in EJCs and LI communities statewide. The analysis looked at both the EJC and LI location distribution within the selected projects, and also how those geographic distributions compare to the EJC and LI distribution throughout the state. This comparison to the statewide distribution of EJCs and LI communities shows if the solar projects are being spread throughout the state in a way that is reflective of goals of the program, or if they are concentrated in other areas. The analysis indicates that, to date, the selection criteria have been successful in awarding the majority of REC incentives to projects located in EJCs in both sub-programs. High-level takeaways from the analysis include:

- Overall, while only a quarter of all counties in Illinois contain designated EJCs, 95% of Non-Profit/Public Facilities and Low-Income Community Solar REC incentives went to these counties. This indicates that the ILSFA program is meeting its goals of awarding funding to projects in EJCs or EJC-adjacent areas above and beyond the required 25%.
- Of the 11 awarded community solar projects, 7 are located in designated EJCs and these projects represent 84% of the awarded REC incentives across the first three program years. Additionally, three more projects are located in counties with at least one EJC-designated block group.
- Of the larger pool of 48 non-profit and public facility projects, 69% of projects are in EJCs, accounting for 67% of the total incentives awarded. Only two projects (representing 2% of the Non-Profit/Public Facilities REC credits) are in counties with no designated EJCs.
- These results are indicative of the current selection criteria's effectiveness when considering that EJCs represent one quarter of the census block groups of the state. Furthermore, only a quarter of Illinois counties contain designated EJC block groups. Cook, Peoria, and St. Clair counties have the highest percentage of households living in EJCs, while Cook, Kane, and Will counties have the highest number of households living in EJCs.

[The full dataset](#) has been made publicly available, and the Program Team request stakeholders consult it to inform their feedback on whether changes should be made to the Project Selection Protocol.

Questions:

- Given this data, do you feel the location criteria of the community solar program is working well to provide the benefits of solar to EJCs and LI communities? If not, what communities are not being served?

- What type of location criteria would better direct funds to the areas you define as underserved?
- For example, would tiering within existing designated EJCs be a method of interest, in order to provide additional point spread in the EJC selection round? An example of tiering could be giving more weight in the first round of project selection to projects located in EJCs in the counties with the highest percentage of households in EJCs (reflecting EJC density).
- Funding for PY4 is available beginning June 1, 2021. The project submission window timelines haven't yet been determined, but, for reference, the windows opened July 6, 2020 for Non-Profit/Public Facilities and Low-Income Distributed Generation projects and on August 24, 2020 for Low-Income Community Solar projects in PY3, and dates for PY4 could be similar. Given project development timelines, how far in advance of the PY4 project submission window opening is a finalized Project Selection Protocol needed? Please note that waiting to implement more substantive changes for PY5 (starting June 1, 2022), so as to allow more advance notice for Approved Vendors, may not be a viable option because the Long-Term Renewable Resources Procurement Plan will be updated prior to the start of PY5 and may include additional changes impacting ILSFA's project selection process.