



**Illinois  
Solar for All**

09.19.2022

# Approved Vendor Manual

VERSION 5.0

1. . Introduction .....	6
1.1. Illinois Solar for All Program .....	6
1.1.1. Legislation and Administration .....	6
1.1.2. Program Funding .....	7
1.1.3. Long-Term Renewable Resources Procurement Plan .....	7
1.1.4. Intent of Illinois Solar for All Program .....	8
1.2. Environmental Justice Communities .....	8
1.3. Existing and New Design Elements.....	9
1.3.1. Small and Emerging Business Development.....	9
1.3.2. Energy Sovereignty .....	10
1.3.3. Equity and Environmental Justice Programs .....	11
1.3.4. Energy Efficiency Programs and Community Action Agencies .....	11
1.3.5. Climate Bank and the Clean Energy Jobs and Justice Fund .....	11
1.3.6. Equitable Energy Upgrade Program.....	12
2. . Sub-Programs Overview.....	13
2.1. Illinois Solar for All: Residential (Small) Sub-Program.....	14
2.2. Illinois Solar for All: Non-Profit and Public Facilities Sub-program .....	15
2.3. Illinois Solar for All: Community Solar Sub-program.....	17
2.4. Illinois Solar for All: Residential (Large) Sub-program.....	19
3. . Approved Vendor Requirements and Registration.....	21
3.1. Approved Vendor Types .....	21
3.2. Roles in the Approved Vendor Model.....	24
3.3. Approved Vendor Registration Process .....	25
3.4. Registration Requirements and Scoring Rubric.....	26
3.5. Approved Vendor Support .....	27
3.6. Approved Vendor Conduct and Violation of Requirements.....	27
3.7. Changes to Approved Vendors and Projects.....	30
4. Project and Participant Eligibility .....	32
4.1. Illinois Solar for All: Residential (Small and Large) .....	32
4.2. Non-Profit and Public Facilities .....	35
4.3. Community Solar .....	39
5. Participant Savings Requirements .....	41

5.1. Term of Savings .....	42
5.2. Calculating Total Costs and Fees .....	42
5.3. Escalation and Degradation Rates.....	42
5.4. Savings Calculations.....	43
5.5. Determining the Energy Rate .....	45
5.6. Tangible Benefits and Value to Participants.....	46
6. Project and Participant Verification.....	47
6.1. Residential Solar (Small) .....	57
6.2. Non-Profit and Public Facilities .....	60
6.3. Community Solar .....	62
6.4. Data Management and Validation .....	66
7. Marketing and Consumer Protection Requirements.....	67
7.1. Consumer Protections.....	67
7.2. Program Informational Brochures.....	67
7.3. Program Branding.....	69
7.4. Marketing and Sales Messages .....	71
7.5. Identity and Affiliation Guidelines.....	76
7.6. Program Administrator Review Process.....	77
7.7. Violation of Marketing and Consumer Protection Guidelines .....	78
8. Project Submission Processes .....	79
8.1. Project Submission Process Overview.....	79
8.2. Disclosure Forms .....	81
8.3. Batches .....	83
8.4. Part I Project Approval .....	84
8.5. Part II Project Approval .....	89
8.6. Development Timelines and Extensions .....	92
9. Project Selection and Prioritization .....	93
10. System Requirements .....	96
10.1. Current Laws, Regulations, and Codes .....	96
10.2. Licensing and Certification .....	96
10.3. Previously Used Equipment.....	96
10.4. System Location.....	97

10.5. Interconnection Date .....	97
10.6. Installer Requirements .....	97
10.7. Expansions .....	98
10.8. Co-location .....	98
10.9. Site Control .....	100
10.10. Site Map.....	101
10.11. Shading Study .....	101
10.12. REC Quantity Calculation.....	101
10.13. System Size .....	103
10.14. Systems with Battery Backup .....	104
10.15. Systems that Directly Serve DC Loads .....	104
10.16. Metering.....	105
10.17. No Partial Systems.....	105
11. Renewable Energy Credit Management .....	106
11.1. Contracting Process.....	106
11.2. REC Delivery.....	108
11.3. Community Solar REC Value Calculation .....	110
11.4. Systems Already Energized at the Time of Contract Signing.....	111
11.5. Submitting REC Information to Tracking Systems .....	111
11.6. Assignment of REC Contracts .....	111
11.7. Collateral Assignment.....	112
12. Annual Reports and System Performance Evaluation .....	113
12.1. REC Delivery Performance Annual Report .....	113
12.2. Reporting for Community Solar Projects.....	114
12.3. Collateral and Performance Evaluation.....	116
12.4. Underperformance and Surplus RECs .....	117
13. Invoicing and Payments .....	118
14. Inspections .....	120
14.1. Quality Assurance Overview.....	120
14.2. Site Suitability .....	121
14.3. Photo Documentation .....	122
14.4. Onsite Inspections .....	124

15. Job Training Requirements and Verification.....	127
15.1. Overview and Program Requirements .....	127
15.2. Defining Eligible Trainees and Qualified Job Training Programs .....	129
15.3. Data Collection .....	132
15.4. Waiver Process .....	133
15.5. Job Training Requirements Compliance Assessment.....	135
15.6. Job Training Resources and Tools .....	135
16. Complaint Management .....	137
16.1. Complaint Management Requirements.....	138
16.2. Complaint Management Best Practices .....	139
16.3. Reporting Incidents .....	139
17. Confidentiality.....	141
18. Vendor Manual Updates.....	141
19. Appendix.....	142
19.1. Approved Vendor Manual Updates.....	142

# 1. Introduction

The Illinois Solar for All Approved Vendor Manual provides detailed guidance for Approved Vendors on the intent, requirements, and processes of the Illinois Solar for All (ILSFA) program. This document includes 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 ILSFA Approved Vendor Manual will be updated to reflect new or revised program information. A red-lined version of the manual will be posted on the ILSFA website and announced to stakeholders each time the Approved Vendor Manual is updated. Changes from previously released versions will be highlighted in redlining and added to an appendix at the end of the manual. Version 5.0 of the Approved Vendor Manual will take effect starting with the 2022-2023 program year. The Illinois Power Agency (IPA or Agency), per the 2022 Long-Term Plan, allocates funds and considers project applications within ILSFA based on “program years,” which track the same period as energy delivery years (June 1<sup>st</sup> of one year to May 31<sup>st</sup> of the following year).

This manual presents resources and information needed to help Approved Vendors and Approved Vendor applicants navigate the requirements and processes of the ILSFA 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 Income-Eligible Communities (IECs) and Environmental Justice Communities (EJCs) across Illinois.

## 1.1. Illinois Solar for All Program

### PROGRAM WEBSITE

The latest news, updates, information, and program interface for Approved Vendors are available on the ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com). This website provides an online portal for registration of ILSFA Approved Vendors. Once registered, Approved Vendors receive unique login credentials that provide access to resources, an individual project and performance dashboard, and a portal for submitting and tracking projects through completion.

The website also provides information and resources for the public and other program stakeholders, including resources on participant eligibility, job training programs, grassroots education funding, EJCs, IECs, and more. The Program Administrator will use the website and email communications as the prevailing methods for sharing and exchanging information with Approved Vendors.

### 1.1.1. LEGISLATION AND ADMINISTRATION

ILSFA 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 or FEJA) and [Public Act 102-0662](#) (known as the Climate and Equitable Jobs Act or CEJA) on September 15, 2021. The IPA is the state agency responsible for the implementation of the program. Day-to-day administration of the program is the responsibility of the Agency’s Program Administrator, Elevate, and partner firms 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. Held by the State of Illinois, the RERF was originally funded by Alternative Retail Energy Suppliers through Alternative Compliance Payments. The IPA and the ILSFA Program Administrator have updated the ILSFA sub-program names. The participant-friendly names in parentheses below, will be used in all Approved Vendor documents and participant-facing materials for Program Year 2022-2023. The approved 2022 [Long-Term Renewable Resources Procurement Plan](#) (2022 Plan) allows for \$16.5 million annually to fund the Low-Income Single-Family and Small Multifamily Solar (now called Illinois Solar for All: Residential Solar (Small)), Low-Income Community Solar (LICS) (now called Illinois Solar for All: Community Solar), Incentives for Non-Profits and Public Facilities (NP/PF) (now called Illinois Solar for All: Non-Profits and Public Facilities), and Low-Income Large Multifamily Solar (now called Illinois Solar for All: Residential Solar (Large)) sub-programs of ILSFA from the RERF. The utility-held Renewable Portfolio Standard funds were collected from ratepayers through dedicated bill riders for funding renewable energy resources. P.A. 102-0662 allows for the transfer of \$50 million from the utility-held funds annually to fund ILSFA. This dual source of funding creates some complexities in contracting for REC purchases. REC contracts are funded solely with one or the other funds, with a spending priority placed on utility-held funds.

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

A complete description of the ILSFA program can be found in Chapter 8 of the 2022 Plan. The 2022 Plan lays out requirements for developing and implementing ILSFA, including annual funding, Approved Vendor requirements, consumer protections, vendor marketing guidelines, and incentive values. The 2022 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 EJC and Energy Sovereignty projects respectively, among other important program parameters.

The Initial Plan was approved by the Illinois Commerce Commission (ICC) on April 3, 2018, and provided a framework for program delivery through February 2020. On October 21, 2019, the Agency filed a Revised Plan for review and approval at the ICC in Docket No. 19-0995. The ICC issued a Final Order approving the Revised Plan on February 18, 2020, and the Revised Plan was published on April 20, 2020. The Final 2022 Procurement Plan was filed with the Commission in Docket 21-0717 on March 21, 2022, which approved the Plan on July 14, 2022.

This manual may be subject to change based on future changes made to the Plan. In addition to the approval of the Agency's 2022 Plan, many other aspects of photovoltaic (PV) development and

installation in Illinois are under the jurisdiction of the ICC. These include the certification of distributed generation (DG) installers, interconnection standards, net metering tariffs, and tariffs allowing for a smart inverter rebate for non-residential 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 IECs and EJs across Illinois. Income-eligible households, non-profit organizations, and public entities that participate in ILSFA see significant electricity savings and are provided comprehensive consumer protections important to the unique needs of these communities. Income-eligible households will not see upfront costs, with limited exceptions. While the [Adjustable Block Program](#) (ABP), also known as Illinois Shines, 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 allow a more significant share of incentives to be passed on directly to qualifying participants. Income-eligible households and IECs are defined as low-income (below the 80% median income of the area) per the [2022 Long Term Renewable Resources Procurement Plan](#).

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 ILSFA program seeks to overcome historic barriers to developing solar for income-eligible households, such as a lack of taxable income needed to monetize tax-based incentives, a lack of access to capital, a lack of access to workforce development, and other institutional barriers that limit accessing these opportunities. To promote ownership and local community wealth building, the program reserves 25% of program incentives for projects that exhibit energy sovereignty features, which include expedited customer system ownership and community solar cooperative models. Recognizing the disproportionate barriers small and emerging businesses face, the program supports these businesses by training eligible businesses on ownership and management of solar projects and connecting them with services offered by other state entities.

## 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. Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income concerning the development, implementation, and enforcement of environmental laws, regulations, and policies. ILSFA 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 EJs.

To help ensure that EJs are made aware of opportunities for participation in ILSFA, grassroots education funding will be prioritized for EJs. Up to 60% of the funding (or 3 percentage points of the 5%) will be used for this purpose.

A methodology for determining which communities in Illinois qualify as EJs for ILSFA was established in the Initial Plan and was further refined by the Program Administrator and Agency through a stakeholder engagement process. An interactive mapping tool allows users to identify qualifying EJs by census block



groups across the state. This tool provides a map of these communities and an address lookup feature tool that allows users to enter any address in the state and determine whether that property is located within an EJC.

In addition to EJCs that have been determined based on the methodology laid out in the 2022 Plan and through stakeholder feedback, the Program Administrator and Agency have also established a process for communities [to Self-Designate](#) as an EJC. The map of EJCs will be updated to reflect additional approved requests for self-designation as Self-Designation applications are approved. The ILSFA Environmental Justice Community Map and the Income-Eligibility Community Map will be updated based on the 2020 census, and EJ score data will be updated as it becomes available. These map updates are expected to be completed and applicable for the 2023-2024 (PY6) Program Year.

Access the Illinois Solar for All Environmental Justice Community Map [here](#).

Access the Illinois Solar for All Self Designation Process [here](#) and the Self-Designation Application [here](#). Helpful tips for Self-Designation Applications can be found [here](#).

### 1.3. Existing and New Design Elements

The Climate and Equitable Jobs Act (or CEJA), enacted as P.A. 102-0662, created new programs and design elements for ILSFA, which are included in the 2022 Plan. Several new programs created by CEJA that are administered by other state entities may provide additional support for ILSFA projects. This section outlines those programs and additional requirements for how the Program Administrator interacts with existing state programs, such as energy efficiency programs. Many of these are still under development, and the Program Administrator will provide updates as they are available.

#### 1.3.1. SMALL AND EMERGING BUSINESS DEVELOPMENT

CEJA included several provisions aimed at encouraging business development. It requires the IPA to “make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program”<sup>1</sup> and report on progress annually.

The 2022 Plan defines Eligible Small Businesses as those with annual gross sales of less than \$75,000,000. The Program Administrator will support small and emerging businesses by providing training on ownership and management of solar projects to eligible businesses and connecting them with services and programs offered by other state departments and organizations to ensure their participation in the program. In addition, businesses located in IECs and those providing training on the implementation of energy sovereignty and community-driven projects will receive support as needed. Additional business training opportunities will be available for Approved Vendors that will address ownership and management of projects.

CEJA also creates job training and business development programs, as discussed in more detail in Section 8.8.1 of the 2022 Plan. The Program Administrator will keep Approved Vendors updated on

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<sup>1</sup> Public Act 102-0662 Section 1-56 (b)(2) n)

relevant programs and resources offered by state agencies and support by the Community Solar Energy Sovereignty Grant Program.

### 1.3.2. ENERGY SOVEREIGNTY

To provide customers and communities participating in ILSFA with benefits beyond electricity cost-savings, 25% of funding for each sub-program per program year is reserved for projects that promote “energy sovereignty.” Although P.A. 102-0662 does not define energy sovereignty, the 2022 Plan provides the following definition:

*“Energy sovereignty” means the eligible low-income household or community organization having or being on a defined path to majority or full ownership of the photovoltaic generating facility or, in the case of a cooperative or community ownership model, a share or membership in the entity that owns the photovoltaic generating facility. For the purpose of this definition, “ownership” means not only legal title to the property but also the right to participate in decisions regarding the governance, maintenance, and use of the facility and to benefit from the use of that facility. For the purpose of this definition, “photovoltaic generating facility” means any equipment that generates electricity from solar energy. If the project includes associated energy storage equipment, the eligible low-income household or community organization is not required to, but may, own such storage equipment to qualify as an “energy sovereignty” project.*

Projects within the Residential and Non-Profit and Public Facilities sub-programs can achieve energy sovereignty designation through a lease or power purchase agreement (PPA) with an early buyout at seven years or earlier after energization. Those projects will also receive a \$10 REC adder applied to the project’s REC contract for RECs delivered after the transfer of ownership is completed. Residential and Non-Profit and Public Facilities energy sovereignty projects must include information on the cost and timing of the transfer of ownership, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance within their third-party owner (TPO) or power purchase agreement (PPA) customer contract.

Projects within the Community Solar sub-program can qualify for energy sovereignty designation through an ownership or a cooperative model. The ownership model includes a lease or PPA with a buyout clause that is triggered at seven years or earlier after energization to give the customer ownership of the panels corresponding to their subscription to the CS project. The cooperative model allows for a co-op organization to sell subscriptions to customers/owners of the co-op, with the customer receiving a low-cost subscription and any financial benefits of ownership.

Any ownership model used to achieve energy sovereignty designation must still be compatible with ILSA’s function of buying 15 years of RECs generated from solar projects upon initial approval and energization of a solar project, providing an up-front incentive.

To make the local community wealth building associated with energy sovereignty as accessible as possible, Grassroots Educators are encouraged to provide education on the principles of energy sovereignty for participants in designated projects, “ownership training,” which can include but is not limited to: training on finance, project management, maintenance and operations, customer acquisition, regulations, and insurance. Experts on these topics can be hired as business instructors and serve as mentors for owners of energy sovereignty designated Community Solar projects. Ownership training can be an “other activity” for Grassroots Education efforts.

The Program Administrator has outlined initial requirements in this document for Energy sovereignty projects in this Manual and seeks comments from stakeholders on those proposals. The Program Administrator will update the Vendor Manual in response to those comments and publish the Manual before the Program Year 5 submission windows open.

### **1.3.3. EQUITY AND ENVIRONMENTAL JUSTICE PROGRAMS**

In Section 5-60 of the Energy Transition Act, CEJA establishes the Jobs and Environmental Justice Grant Program with two subprograms:

- 1) the Equitable Energy Future Grant Program and
- 2) the Community Solar Energy Sovereignty Grant Program, both administered by the DCEO.

These grant programs will award up to \$1,000,000 per application “to provide businesses, organizations, and community groups with capital needed to plan, develop, and execute” a renewable energy or energy efficiency project. As described below, these two grant programs are directed to coordinate with ILSFA, and the Program Administrator will provide updates to Approved Vendors about the grant programs as they are developed. See section 2.3 of this manual, Illinois Solar for All: Community Solar Sub-Program, for more details on this eligible cooperative model.

To ensure the benefits of the clean energy economy are equitably distributed across the State, Approved Vendors (including Designees and Aggregators) and their subcontractors must report demographic and geographic data, including racial and ethnic identity, from Approved Vendors (including Aggregators and Designees), their subcontractors, and applicants to any of these positions. This data will be aggregated and published annually, ensuring transparency and public accountability.

### **1.3.4. ENERGY EFFICIENCY PROGRAMS AND COMMUNITY ACTION AGENCIES**

CEJA requires ILSFA “be implemented in a manner that seeks to minimize administrative costs and maximize efficiencies and synergies available through coordination with similar initiatives,” including energy efficiency programs and the 35 community action agencies (CAAs) in Illinois that administer state weatherization and energy assistance programs.

In addition to coordinating with these programs, the Program Administrator has created a Resource Guide to assist potential program participants in overcoming barriers to participation. The Guide identifies energy efficiency programs and programs to address deferred maintenance. The IPA and the Program Administrator will continue to work with utilities, administrators of the Low Income Home Energy Assistance Program (“LIHEAP”) and the Illinois Home Weatherization Assistance Program (“IHWAP”), and other relevant organizations to develop opportunities to share referrals between ILSFA and programs that similarly address energy costs and energy burdens of income-eligible households and non-profit and public facility participants.

### **1.3.5. CLIMATE BANK AND THE CLEAN ENERGY JOBS AND JUSTICE FUND**

CEJA establishes financial vehicles to aid in the deployment of clean energy and directs the Illinois Finance Authority to create a Climate Bank “to aid in all respects with providing financial assistance,

programs, and products to finance and otherwise develop and facilitate opportunities to develop clean energy and provide clean water, drinking water, and wastewater treatment in the State.”<sup>2</sup>

Section 20-15 of the Illinois Clean Energy Jobs and Justice Fund Act creates the Clean Energy Jobs and Justice Fund, a nonprofit corporation. The Fund “has authority to pursue a broad range of financial products and services”<sup>3</sup> that “foster the development and commercialization of clean energy projects, including projects serving low-income, environmental justice, and BIPOC communities, and support project development by MBE and other contractors of color.”<sup>4</sup> The board of the Fund is instructed to consider a number of investment initiatives, many of which could affect ILSFA, including “a solar lease, power-purchase agreement, or loan-to-own product specifically designed to complement and grow the Illinois Solar for All Program.” The Program Administrator will work with the IPA and the board of the Clean Energy Jobs and Justice Fund to facilitate integration across the programs and provide information to Approved Vendors.

### **1.3.6. EQUITABLE ENERGY UPGRADE PROGRAM**

CEJA directs the Illinois Commerce Commission to establish the Equitable Energy Upgrade Program, which “permits customers to finance the construction of energy projects through an optional tariff payable directly through their utility bill, modeled after the Pay As You Save system, developed by the Energy Efficiency Institute.” Funds may be used for solar installations and other energy improvements. Pay As You Save (“PAYS”) can be a way to finance ownership of on-site solar, especially for residents of small 1-4 unit buildings, since repayment is tied to the meter and passes on to any future occupant living in that unit. While participants of any income level can use this system, there may be synergies for participants eligible for ILSFA as a way to facilitate energy sovereignty.

The Program Administrator will integrate the Equitable Energy Upgrade Program with Illinois Solar for All once the ICC finalizes it.

In addition to the Equitable Energy Upgrade Program, various other state, federal, and non-profit programs provide home repairs and upgrades for eligible households.

The U.S. Department of Housing and Urban Development (HUD) offers such programs and cites several other agencies and non-profits that provide a range of assistance, including HUD-approved housing counseling agencies, the Illinois Housing Development Authority, Illinois affiliates of Habitat for Humanity, U.S. Department of Veterans Affairs Regional Loan Centers, and the USDA Rural Development Office.

The Program Administrator will work with these entities to explore the potential for coordination between solar installations and home repair programs and seek to integrate those opportunities into

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<sup>2</sup> 20 ILCS 3855/1-75(c)(1)(M)

<sup>3</sup> Illinois Clean Energy Jobs and Justice Fund Act, §20-30(a), enacted through Public Act 102-0662 (2021).

<sup>4</sup> Illinois Clean Energy Jobs and Justice Fund Act, §20-25(a)(2), enacted through Public Act 102-0662 (2021).

the ILSFA program.

## 2. Sub-Programs Overview

ILSFA incentives are allocated through four sub-programs: 1) Residential (Small), 2) Non-Profit and Public Facilities, 3) Community Solar, and 4) Residential (Large). This manual provides guidance for Approved Vendors to participate in all sub-programs.

All ILSFA sub-programs require that participants see a minimum specified savings, where ongoing costs or fees to the participant do not exceed 50% of the value of energy produced by their PV system or, in the case of community solar, their share of the installed PV system (see Section 5 on Participant Savings Requirements of this manual for more details). The Residential (Small) sub-program additionally requires eligible households in 1-4 unit buildings incur no upfront costs (defined as any costs paid prior to project energization). Each sub-program includes important consumer protections specific to the sub-program. Although Approved Vendors are prohibited from charging upfront costs for projects in the Residential (Small) sub-program, upfront costs are allowed in the other sub-programs in specific circumstances. Savings, however, are still expected to be shared with the participating non-profit, public facility or residents of the multi-family building. More details on the requirements for these sub-programs are in Sections 2.2 and 4.2.

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>5</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 IPA for RERF-funded REC purchases or Illinois electric utilities for utility-funded REC purchases. REC prices were updated in the 2022 Plan.

Sub-program budgets will be announced on the ILSFA website prior to the start of the 2022-2023 Program Year.

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<sup>5</sup> The exceptions to the rule of all RECs generated being delivered and compensated are generally as follows: in any given year of the 15-year contract, any unsubscribed share of a Community Solar project would not receive payment for its RECs. Additionally, RECs associated with the unsubscribed share as of one year after energization would not be required to be delivered throughout the 15 years. Additionally, any subscribed share of a Community Solar project that has a non-income-eligible subscriber other than the project's anchor tenant would not receive payment or have a delivery obligation for the associated RECs.

## 2.1. Illinois Solar for All: Residential (Small) Sub-Program

Residential (Small) projects are distributed generation (DG) projects that are installed onsite, typically behind a customer’s meter, and are used primarily to offset a single customer’s load. Within ILSFA, Residential projects serve two market segments: one- to four-unit residential (Small) and five or more-unit residential (Large) (see Section 2.4 below), each with a specific REC price schedule. The Residential (Small) sub-program incentive is intended to provide funding for PV projects located on residential properties where, if serving a building with multiple units, 50% or more of the building’s households are income-eligible. See section 5.2 of this manual, Project and Participant Eligibility, for more details.

CEJA introduced several changes to this subprogram intended to reduce barriers to participation and grow the income-eligible market for distributed generation.

The IPA and the Program Administrator have worked with stakeholders to identify barriers to participation in this sub-program and continue to explore and implement adjustments to increase participation, lower soft costs, and simplify customer acquisition procedures.

The 2022 Plan included additional steps for streamlining the project submission process, such as:

- Extending the time period during which the Program Administrator-provided income verification is valid from 6 to 12 months (Section 8.5.3).
- Eliminating the requirement to present and sign the disclosure form seven days prior to consummation of the contract along with extending the cancellation period to simplify the participant engagement process.
- Reaffirming the Agency’s commitment to work more closely with third-party energy efficiency program administrator or community action agencies to facilitate connecting their participants to Illinois Solar for All Approved Vendors and providing initial site suitability screening where applicable (Section 8.8.3).
- Removing the minimum batch requirement (Section 8.10.1) and making the ILSFA and ABP portals simpler and more uniform with each other.
- Redesigning the disclosure forms for ILSFA to shorten and simplify the documents.

**TABLE 2.1. INCENTIVES FOR 1- TO 4-UNIT BUILDINGS MARKET SEGMENT (\$/REC)<sup>6</sup>**

System Size	Group A	Group B
<= 10 kW	\$180.67	\$175.23
> 10 - 25 kW	\$142.16	\$141.75
> 25 - 100 kW	\$107.10	\$108.51

<sup>6</sup> Section 8.5.3.2. of the 2022 Long-Term Plan. Incentives for the Low-Income Single and Small Multifamily Solar Program(\$/REC)

To encourage Energy Sovereignty, an additional \$10 per REC would be added for projects that result in ownership by the customer, such as through an early buyout of a lease or PPA.

## ENERGY SOVEREIGNTY

Within the Residential (Small) sub-program, 25% of incentives are reserved for Energy Sovereignty projects, with the Project Selection Protocol giving preference to projects that facilitate energy sovereignty. Residential projects can achieve energy sovereignty through a third-party owner (TPO) lease or power purchase agreement (PPA) with the option of an early buyout 5-7 years after energization. The contract between the customer and the TPO should define the terms of the buyout, as ILSFA REC payments are paid upfront, removing the option of withholding payments to ensure the ownership transfer occurs as planned.

Contracts should specify:

- Cost and timing of the transfer of ownership
- Transfer of warranties and insurance
- Cost and terms of ongoing monitoring, maintenance, and insurance

Notification of transfer of ownership should be provided to the Program Administrator by the Approved Vendor, along with documentation of how the transfer meets the terms of the contract, immediately upon transfer. If the transfer does not happen, the buyer would be allowed to claw back any energy sovereignty incentives from the Approved Vendor.

## 2.2. Illinois Solar for All: Non-Profit and Public Facilities Sub-program

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

Non-Profit and Public Facilities projects must be located within Income-Eligible Communities (IECs) or Environmental Justice Communities (EJCs). Additionally, projects must demonstrate both of the following conditions:

1. A sufficient connection to and input from the IEC or EJC members and/or the non-profit or public facility it serves, evidenced by:
  - a. 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. 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
2. The property is occupied by a Critical Service Provider (CSP) for the community (e.g., youth centers, hospitals, schools, homeless shelters, senior centers, community centers, places of worship, affordable housing providers including public housing sites). For a public facility, the

building must host a department/agency that is a CSP meeting this standard. Section 4.2 of this manual includes a list of qualified CSPs.

After the 2022-2023 program year, the Non-Profit and Public Facilities sub-program will no longer include public schools. Additionally, beginning with the current program year, the Program will no longer allow distributed generation projects serving multifamily residential facilities to participate in the Non-Profit and Public Facilities sub-program since these types of projects qualify to apply for the Residential (Large) sub-program.

## ENERGY SOVEREIGNTY

The Non-Profit and Public Facilities sub-program reserves 25% of incentives for Energy Sovereignty projects, with the Project Selection Protocol giving preference to projects that facilitate energy sovereignty. Non-profit or public facilities projects can achieve energy sovereignty through a third-party owner (TPO) lease or power purchase agreement (PPA) with the option of an early buyout 5-7 years after energization. The contract between the customer and the TPO should define the terms of the buyout, as ILSFA REC payments are paid upfront, removing the option of withholding payments to ensure the ownership transfer occurs as planned.

Contracts should specify:

- Cost and timing of the transfer of ownership
- Transfer of warranties and insurance
- Cost of ongoing monitoring, maintenance, and insurance

Notification of transfer of ownership should be provided to the Program Administrator by the Approved Vendor, along with documentation of how the transfer meets the terms of the contract, immediately upon transfer. If the transfer does not happen, the buyer would be allowed to claw back any energy sovereignty incentives from the Approved Vendor.

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

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
<= 25 kW	\$100.76	\$114.60
> 25 - 100 kW	\$104.21	\$114.05
> 100 - 200 kW	\$104.82	\$109.82
> 200 - 500 kW	\$98.15	\$104.03
> 500 - 2000 kW	\$96.39	\$97.71
> 2000 - 5000 kW	\$85.22	\$80.19

To encourage Energy Sovereignty, an additional \$10 per REC would be added for projects that result in ownership by the customer, such as through an early buyout of a lease or PPA.



## 2.3. Illinois Solar for All: Community Solar Sub-program

Community Solar projects are installed on rooftops or ground-mounted and are interconnected directly to the utility's distribution system. Community Solar projects are installed anywhere within a utility service territory and can be subscribed to by residents who live within that utility service territory. Community Solar incentives are intended to provide funding for community solar projects designed to serve income-eligible households. See Section 5.2 of this manual, Project and Participant Eligibility, for more detail.

Except as noted in this paragraph, subscribers to a Community Solar project must be income-eligible residential households (which for this purpose includes a master-metered affordable housing building), and RECs produced from the corresponding subscription shares will receive the Community Solar prices shown below. No subscriber may have greater than a 40% share of the system capacity. A Community Solar project may have only one anchor tenant that is not an income-eligible residential household, and such anchor tenant must be identified at the time of project application. An anchor tenant may be any rate-paying<sup>7</sup> income-eligible residential household, a business, a non-profit organization, or a public entity. RECs<sup>8</sup> produced from an anchor tenant's share of the project will be paid based on currently applicable Adjustable Block Program prices. Outside of the anchor tenant, any subscription share that is not subscribed by an income-eligible residential household will not receive payments, nor will the Approved Vendor be required to deliver those RECs through the ILSFA REC contract. The first annual report for each project (submitted one year after the time of energization) must identify at least 50% of proposed income-eligible household subscribers (in kW volume) in order for the project to receive payment under the contract. See the REC contract for specific requirements and remedies.

Collateral of 5% of total remaining project REC value must be maintained for 10 years. Approved Vendors must submit annual reports to verify new subscriber income and income-eligible 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.

Master-metered income-eligible residential housing entities are eligible to subscribe as an anchor tenant of a Community Solar project where the building owner/manager commits to passing along the value of at least 50% of the energy savings to tenants in tangible ways. Because the net metering bill credit for such subscribers will be supply-only, costs/savings will be based on that net metering value. Options for passing benefits to residents include: reduced (or not raised) rents; new staff that serve all tenants; facility upgrades (excluding repairs and renovations necessary to maintain building codes or organization certifications); new equipment that serves all tenants; or other payments, benefits, or

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<sup>7</sup> Note that for a master-metered affordable housing building to be considered an income-eligible residential household, the property owner must demonstrate that the required savings value is passed on to tenants. Master-metered buildings may participate as anchor tenants without this requirement.

<sup>8</sup> Note, in the first two program years, non-profit and public sector anchors could receive REC payments at the ILSFA LICS price. Regardless of a project's energization date, invoices are generated based on the REC prices listed in the contract

services to all tenants that would not otherwise have been possible without the savings generated by the photovoltaic system. These benefits must be available to all the tenants, regardless of income level or individual participant uptake. Additionally, the building owner/manager will communicate those benefits to all residents and that they resulted from the installation of solar.

The Approved Vendor should consult with the Vendor Manager to ensure that provision of tangible benefits is verifiable and easily managed. The proposed tangible benefits should be quantifiable and verified through supporting documentation such as dated and paid invoices/bills that tie back to leases, scopes of work, services, or goods that comprise the tangible benefits provided to tenants. The Approved Vendor should submit a tangible benefit plan along with their request for recipient validation with the initial project submission, demonstrating the building owner/manager’s commitment to pass along the full value of the required savings to residents and describing in detail how this will be accomplished.

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

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
<= 25 kW	\$94.50	\$104.81
> 25 - 100 kW	\$98.75	\$109.13
> 100 - 200 kW	\$101.09	\$110.76
> 200 - 500 kW	\$96.10	\$106.32
> 500 - 2000 kW	\$87.49	\$96.43
> 2000 - 5000 kW	\$78.01	\$83.80

**TABLE 2.5. INCENTIVES FOR NON-QUALIFIED PARTICIPANT SHARE OF COMMUNITY SOLAR PROJECTS (\$/REC)<sup>9</sup>**

<b>System Size</b>	<b>Group A</b>	<b>Group B</b>
≤ 25 kW	\$71.60	\$78.27
>25 - 100 kW	\$75.34	\$82.16
>100 - 200 kW	\$77.27	\$83.42
>200 - 500 kW	\$72.47	\$79.19
>500 - 2000 kW	\$64.76	\$70.12
>2000 kW – 5000 kW	\$56.85	\$59.44

<sup>9</sup> These prices reflect Community Driven Community Solar prices from the Adjustable Block Program (Section 7.5.2 of the 2022 Plan)

## ENERGY SOVEREIGNTY

The Community Solar sub-program reserves 25% of incentives for Energy Sovereignty projects, with the Project Selection Protocol giving preference to projects that facilitate energy sovereignty. Projects within the Community Solar sub-program can qualify for energy sovereignty designation through an ownership or cooperative model. The ownership model includes a lease or PPA with a buyout clause that is triggered at seven years after energization or earlier to give the participant ownership of panels equivalent to their subscription. The cooperative model allows a co-op organization to sell subscriptions to participants/owners of the co-op, with the customer receiving a low-cost subscription and an ownership share. Subscription payments are considered payments for ownership shares in a community solar cooperative on behalf of eligible participants. These shares entitle the participant/owner to receive dividends and to subscribe to electricity from the project at a discounted rate, sufficient to meet bill savings requirements. The participant/owner can sell the shares to other co-op members or to the co-op itself. A TPO may also transfer ownership to an eligible customer after tax benefits have been fully captured, such as through an early buyout of a lease or PPA. Unlike other sub-programs, a nominal up-front fee can be charged to join a Community Solar cooperative.

Any ownership model used for an energy sovereignty project must still be compatible with the ILSFA REC delivery contract of 15 years with payment upon energization of a solar project, providing an up-front incentive.

Community Solar projects organized as cooperatives to promote energy sovereignty are one of the exceptions to the no-up-front-cost requirement for ILSFA and may charge a nominal fee. Based on stakeholder feedback, the IPA will establish a methodology for determining the cap on up-front costs .

### 2.4. Illinois Solar for All: Residential (Large) Sub-program

As detailed in Section 2.1 of this manual, CEJA separated the sub-program, previously known as the Low-Income Distributed Generation Sub-program into two sub-programs: one for single-family and 1-4 unit building projects and one for 5+ unit projects.

As with the Residential (Small) sub-program, the Residential (Large) projects must meet the requirements of the Adjustable Block Program and income-eligible consumer protections. The Residential Solar (Large) sub-program reserves 25% of available funding for projects located in EJC's and 25% for Energy Sovereignty projects.

Despite being separate sub-programs, CEJA provided a single budget allocation for both the new Residential (Small) sub-program and the Residential (Large) sub-program. The 2022 Plan allocates that funding evenly between the two sub-programs for the first nine months of the program year.

For master-metered residential buildings five units and larger, either at least 50% of the tenants must be verified income-eligible, or the building must meet the definition of “affordable housing” contained in the Illinois Affordable Housing Act. Subscriptions for homes or buildings that qualify for US Department of Housing and Urban Development (“HUD”) Project-Based Vouchers or Project-Based Rental Assistance (which are programs for housing units dedicated to income-eligible tenants) also qualify. The income qualification levels required for participation in these programs are lower than the income requirements for ILSFA.

One of the exceptions to the Long-Term Plan’s no-up-front-costs standard is for large Residential (Large) projects (multi-family projects of 5+ units) where the participant purchases the system. In this case, the residential participant’s first-year savings may be less than 50% so long as the calculation of that customer’s expected ongoing savings demonstrates that this requirement would be met through overall savings applied across the full 15 years of the REC delivery contract.

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

System Size	Group A	Group B
<= 10 kW	\$106.87	\$115.50
> 10 - 25 kW	\$88.31	\$97.05
> 25 - 100 kW	\$73.26	\$79.36
> 100 - 200 kW	\$74.04	\$76.40
> 200 - 500 kW	\$67.95	\$70.82
> 500 - 2000 kW	\$66.40	\$65.51
> 2000 - 5000 kW	\$56.54	\$51.31

To establish an incentive level, a system location is considered a single building, i.e., multiple projects at a single building would be considered a single system. Exceptions may be granted for locations on the same roof where it can be demonstrated that the projects serve different, unaffiliated tenants.

### ENERGY SOVEREIGNTY

The Residential (Large) sub-program reserves 25% of incentives for projects that facilitate energy sovereignty, with the Project Selection Protocol giving preference to projects that lead to customer ownership.

Residential (Large) projects can facilitate energy sovereignty through a third-party owner (TPO) lease or power purchase agreement (PPA) with the option of an early buyout 5-7 years after energization. Since support for ILSFA projects is limited to buying RECs up front, a contract between the customer and the TPO should define how the buyout will happen.

Contracts should specify:

- Cost and timing of the transfer of ownership
- Transfer of warranties and insurance
- Cost of ongoing monitoring, maintenance, and insurance

Notification of transfer of ownership should be provided to the Program Administrator by the Approved Vendor, along with documentation of how the transfer meets the terms of the contract, immediately upon transfer. If the transfer does not happen, the buyer would be allowed to claw back any energy sovereignty incentives from the Approved Vendor.

## 3. Approved Vendor Requirements and Registration

Like the Adjustable Block Program, Approved Vendors will be responsible for facilitating participation in ILSFA. Only Approved Vendors will be eligible to receive REC payments through ILSFA as contractual counterparties directly. The Approved Vendor model will ensure the accuracy and quality of information submitted and reduce the administrative burden on the contractual counterparties. This benefits participants because they can 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 ILSFA program could significantly and negatively impact the entire renewable energy market in Illinois. The Agency and the Program Administrator need to have the ability to monitor the program and ensure high-quality performance by Approved Vendors.

### 3.1. Approved Vendor Types

Four types of Approved Vendors can play a role in developing projects for ILSFA: 1) Approved Vendors, 2) Aggregator Approved Vendors, 3) 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. Aggregator Approved Vendors and Designees are types of Approved Vendors that work collaboratively to develop projects. All Approved Vendor types, except for the 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

An Approved Vendor will be the entity that is the contractual counterparty with either the IPA or an Illinois electric utility for RECs purchased through ILSFA 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 responsible for submitting documentation to the Program Administrator (as the responsible party for the information 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 and 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 Aggregator Approved Vendors (Aggregators) play in the market is important, especially because they can help facilitate small or new solar installation companies' participation in ILSFA. Aggregators can provide important services to qualified entities that may otherwise face barriers in the market.

Like Approved Vendors, Aggregators are the contractual counterparty with either the IPA or an Illinois electric utility for RECs purchased through ILSFA. REC Aggregators will work within the ILSFA program, managing RECs on behalf of system owners. It is important to note that Aggregators can act as Approved

Vendors, developing projects and interacting with the market. In this case, entities performing both roles should register separately as both an Approved Vendor and an Aggregator since the requirements and registration processes are different.

The primary difference in the role of Aggregator is their management of REC delivery and contracts for designated entities they represent. Designees or system owners will contract directly with Aggregators, working within the Aggregator's business and fee structure as a separate contractual arrangement from the ILSFA program. While Aggregators must first register with the Adjustable Block Program, the Designee is not required to do so.

It is anticipated that the Designee will be the entity managing customer interaction and installation, and while Designees must follow program processes and requirements, the Aggregator is ultimately accountable for meeting program requirements for projects developed by their Designees. Like the Approved Vendor, the Aggregator Approved Vendor will have to coordinate downstream information from Designees/installers/developers, and individual system owners who may provide information through the Designees/installer/developer, to satisfy project and program requirements. The Aggregator or Designee may enter and manage project applications in the ILSFA portal. Designee status allows registered entities to have their own ILSFA portal accounts to manage project applications independently. Designees must identify and verify the Aggregator they have contracted with upon registration for each project.

## DESIGNEES

Designees, for the most part, will act 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. The Designee or the Aggregator may complete the project application. Designee status allows registered entities to have their own ILSFA portal accounts to manage project applications independently, as long as those accounts are formally associated with a registered Aggregator.

While Aggregators are ultimately responsible for meeting all program requirements, Designees must meet all project-level requirements, including quality assurance and inspection requirements. Failure to meet these requirements or poor-quality performance may result in disciplinary action or warning and suspension status for both the Designee and the Aggregator.

Designees are not required to register for the Adjustable Block Program. However, Designees must register for ILSFA the same way as an Approved Vendor. Designees can register for ILSFA 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 Aggregator at the time of project application.

## SINGLE PROJECT APPROVED VENDOR

Entities can register as an ILSFA Single Project Approved Vendor according to the limitations and requirements set forth in the 2022 Plan. In addition to submitting a Single Project Approved Vendor Registration form to develop a project within ILSFA, an entity that is registering with ILSFA to facilitate

the transfer of an already approved Illinois Solar for All project from one Approved Vendor to another may use a Single Project Approved Vendor registration.

Single Project Approved Vendors within the ILSFA 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 ILSFA or the Adjustable Block Program, but not both.

The following ILSFA 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 ILSFA standard brochures

Note that for Community Solar projects, all consumer protection requirements for ILSFA, 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 at least 10% of all hours performed by Qualified Job Trainees. See the Job Training Requirements section of this manual for more details.

## SUBCONTRACTORS AND CONTRACTING WITH CUSTOMERS

The definition of an Approved Vendor as provided by the 2022 Plan allows for flexibility regarding how various entities may be involved in a given solar development. The use of subcontractors offers an alternative to the Aggregator and Designee roles listed above. It is common in the solar industry for multiple business entities to have roles in the development process at different stages. For example, some solar developers use independent sales organizations to acquire customers and contract with customers. They may also use subcontractors to perform the installation. If that solar developer maintains the REC contract, they must be the Approved Vendor and accept responsibility for meeting all program requirements.

Similarly, some solar companies acquire participants and may even facilitate installation with their employees or subcontractors. But instead of managing long-term REC contracts, they transfer ownership to investor organizations. In these instances, the solar developer could act as a Designee, with the investor organization acting as an Aggregator. It is also feasible that the investor organization is the Approved Vendor and all other entities are subcontractors. In all instances, the Approved Vendor or Aggregator maintains the REC contract and holds accountability for meeting all program requirements.

The flexibility in this model means that those entities directly interacting and ultimately contracting with customers may or may not be Approved Vendors. Therefore, subcontractors must register with the Program Administrator to increase the transparency of the program. This requirement applies to subcontractors directly interacting with end-use customers, including installers, marketing firms, lead generators, and sales organizations. The Agency reserves the right to add additional categories as needed. Potential participants will then be able to verify that a company that reaches out to them is a program participant registered with the program (and likewise be able to review if they are listed on the complaint or disciplinary databases).

Registration shall encompass the subcontractor's provision of contact information, acknowledgment of the business relationship with the Approved Vendor, and identification of the categories of the consumer-facing services provided. Additionally, a subcontractor is responsible for acknowledging that they will comply with all Program requirements applicable to installers or marketing agents, as applicable. Failure by a subcontractor to comply with applicable requirements could subject them to suspension or revocation of their registration. If the subcontractor ignores a suspension (or revocation) decision made by the Program Administrator and continues its market activity nonetheless, any Approved Vendor that works with that subcontractor during that period will be subject to discipline. Likewise, Approved Vendors found to be working with entities engaged in the proscribed activities that fail to register will be subject to discipline.

The ultimate accountability for any given batch or project resides with the Approved Vendor or the Aggregator. But, as stated previously and elsewhere in this document, the Program Administrator will monitor all entities and has the right to exclude any entity from performing work on ILSFA projects.

## 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 subcontractors 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 disciplinary action or suspended from the program accordingly. Specifically, Designees need to register with ILSFA and submit subcontractor information 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 Designees or subcontractors, in a manner consistent with the requirements of the 2022 Plan and of the Approved Vendor's REC contract with the relevant counterparty.

Approved Vendors must renew their approval with the Adjustable Block Program annually to maintain an active status with ILSFA. Failure to do so will result in suspension or removal from the program. While there is no requirement to renew registration annually for the ILSFA program, Approved Vendors must meet all program requirements, including annual performance requirements, to maintain active status with ILSFA. An annual review by the ILSFA Program Administrator will assess each Approved Vendor to ensure all program requirements have been met. Annual performance reviews may result in disciplinary action or suspension from the program based on details outlined elsewhere in this manual. Losing status as an ILSFA 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 Vendors may register through the vendor portal on the ILSFA website: [www.IllinoisSFA.com](http://www.IllinoisSFA.com). 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 Designees are not required to register with the Adjustable Block Program, a partner Aggregator must first confirm the relationship and approve the registration submission.

The ABP requires annual recertification of Approved Vendors, and those that fail to recertify their ABP registrations will not be allowed to submit projects in ILSFA. The registration process for all Approved Vendor types requires the applicant to provide specific information describing the AV's anticipated work with ILSFA, relevant experience, and plans for meeting all program requirements.

Because of the broad definition of Approved Vendor, many 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. Aggregators may use the experience, expertise, and work plans of Designees for their application.

The Approved Vendor registration process asks questions that require a basic understanding of the responsibilities and requirements of participation in ILSFA and for the applicant to make a clear and concise case for their capacity to fulfill such expectations. Applicants should 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, and Applicants should 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, to clarify their roles, and to clearly state how each response corresponds to those entities.

After receiving an application, the Program Administrator will either approve the application or will communicate any deficiencies to the applicant. Once the applicant corrects the deficiencies, a determination will be made and communicated to the applicant. If, after communicating deficiencies to the applicant, the Program Administrator does not receive a response after 10 business days, it has the right to cancel the application. Note that Approved Vendor applications submitted shortly before or during a project submission window may not be reviewed prior to the closing of the project submission window. Registration forms should be received no later than 30 calendar days prior to an initial submission window opening of a program year within any sub-program. This allows the Program Administrator time to review forms and the applicant to respond to requests for clarification.

The Program Administrator will review and approve or reject all Approved Vendor applications. 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. Similarly, if a prospective Approved Vendor is found to have provided incorrect or misleading information within their Approved Vendor application, the Program Administrator reserves the right to grant a conditional approval of an application or outright reject an Approved Vendor application, as detailed below. Any Approved Vendor applications that are rejected will be provided a written explanation with the reasons for the rejection.

A Program Administrator's rejection of an Approved Vendor application may be appealed to the IPA and the opportunity to appeal will be communicated by the Program Administrator as part of its notice of rejection. To appeal to the IPA, the Approved Vendor should provide to the IPA a request for reconsideration 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 their position. The IPA will endeavor to issue final determinations on eligibility, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal. If the final appeal determination is denied, applicants may reapply, but if approved, they will not be able to submit projects until the following program year.

The IPA and the Program Administrator reserve the right to conditionally approve applications from prospective Approved Vendors when those applications have areas of concern to the Program Team. A conditional approval will require six-month updates.

### 3.4. Registration Requirements and Scoring Rubric

Every question in the Approved Vendor registration process has a maximum possible score. Some questions also include a minimum required score, which the question expressly states. 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 they plan to develop through the program. All applicants must achieve a minimum of 64% of points out of all possible points to qualify for registration. 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.

The Program Administrator will request additional, clarifying responses within ten business days from applicants with insufficient or unclear information. 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 three different Approved Vendor Registration Application questionnaires: One for Approved Vendors, Designees, and Single Project Approved Vendors with new projects, one for Single Project Approved Vendors with previously approved projects, and a third for Aggregators. For clarity, individual questionnaires with attestations are available for each Approved Vendor type. These forms are

completed online at [www.IllinoisSFA.com](http://www.IllinoisSFA.com). 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 Designee Registration Form and Attestations](#)
- [ILSFA Single Project Approved Vendor Registration Form and Attestations](#)

### 3.5. Approved Vendor Support

The Program Administrator will assign an Approved Vendor Manager to each prospective Approved Vendor upon submitting a registration application. The Approved Vendor Manager will act as the 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 applications will receive guidance to correct inadequacies where possible.

In addition to incentivizing the participation of minority-/women-owned business enterprises<sup>10</sup> (“MWBE”) in the Project Selection Protocol, the Climate and Equitable Jobs Act of 2021 also directs ILSFA to ensure that “small and emerging businesses”<sup>11</sup> are able to participate in ILSFA. The Program Administrator will make efforts to expand MWBE AV and small and emerging business participation through direct outreach to prospective small and MWBE Approved Vendors and equity-focused industry groups.

### 3.6. Approved Vendor Conduct and Violation of Requirements

#### CODE OF CONDUCT

Approved Vendors and their Designees, subcontractors, representatives, and agents are expected to perform all work under the ILSFA program consistent with the highest technical and ethical standards in their industry. Participation in the ILSFA 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. ILSFA Approved Vendors are expected to work with the Program Administrator in a responsive, forthright, and constructive manner. All Approved Vendors, installers, and subcontractors are expected to conduct any and all business affiliated with the ILSFA Program in a responsible manner that fosters integrity and public confidence. Work receiving incentives through ILSFA shall be in full compliance with all applicable building codes and professional industry standards, as well as in accordance with all applicable federal,

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<sup>10</sup> Minority-/ women-owned business enterprise or “MWBE” means a business certified as such by an authorized unit of government or other authorized entity in Illinois. Additional information about certifying entities can be found on the [ILSFA Approved Vendor Questionnaire for MWBE AVs](#).

<sup>11</sup> The program will use the federal Small Business Administration definition of “small business” based on annual revenues within the appropriate NAICS category, while “emerging business” is defined as a business that has been authorized to do business in any US state for less than three years.

state and local laws, rules and regulations. Approved Vendors and their installers and subcontractors will maintain all required professional licenses or regulatory certifications and are expected to comply with all ILSFA program requirements.

## PROHIBITED ACTIVITIES

Approved Vendors and 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
- Providing inaccurate information to the ILSFA 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
- Forging or falsifying 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 ILSFA quality control processes
- Refusing to honor program-required warranties
- Engaging in behavior that could result in financial harm to the customer
- Treating customers in a disrespectful or unprofessional manner

Whether any action, activity or omission violates or is prohibited by this policy shall be determined by the ILSFA 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 is not limited to, failure to meet consumer protections or marketing guidelines, repeated issues of poor 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, as well as demonstrating a lack of responsiveness to the Program Administrator's and/or IPA's notices or requests for information.

If the Program Administrator finds an Approved Vendor in violation of program requirements, the Program Administrator will notify the Approved Vendor through email providing details of the problematic behavior, describing how the behavior is non-compliant, and potentially requesting more information about the issue. The Approved Vendor must respond in a specific but reasonable timeframe to any such requests. After a review of the response, the Program Administrator will determine whether or not disciplinary measures will be taken, and if so, what the disciplinary measures will be. 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 to the IPA by sending 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. The Adjustable Block Program's Disciplinary Actions Report, can be referenced [here](#).

## DISCIPLINE

A suspension under ILSFA generally prohibits conducting the activities defined below for the duration of the suspension. A suspension may be more limited in scope than what is described below, should circumstances warrant.

When the Program Administrator suspends an Approved Vendor, the Approved Vendor is prohibited from:

- Generating new disclosure forms
- Generating new project applications
- Moving forward on already generated disclosure forms and/or in process project applications
- Marketing of any kind regarding the Program on any platform (i.e., social media, organizational website, marketing and/or customer acquisition via outside marketing firms, etc.), including any statements implying the availability of program incentives through such marketing
- Using Program materials in customer acquisition outreach (e.g., Program Disclosure form, Program brochure, Program logo, etc.)
- Mentioning Illinois Solar for All or ILSFA while performing customer acquisition outreach, including any statements implying the availability of program incentives through outreach
- Partnering with an Approved Vendor and/or Designee in good standing to work around Program suspension

NOTE: The IPA will determine on a case-by-case basis whether an Approved Vendor suspended from participation in ILSFA will also be suspended from participation in the IPA's Adjustable Block Program (also known as Illinois Shines). However, an Approved Vendor suspended from the Adjustable Block Program will automatically be suspended from ILSFA.

When the Program Administrator suspends a Designee, the Designee is prohibited from:

- Generating new disclosure forms
- Moving forward on already generated disclosure forms

- Collaborating with the Designee’s Approved Vendor(s) to convert Disclosure Forms into Project Applications
- Marketing of any kind regarding the Program on any platform (i.e., social media, organizational website, marketing and/or customer acquisition via outside marketing firms, etc.), including any statements implying the availability of program incentives through such marketing
- Using Program materials in customer acquisition outreach (e.g., Program Disclosure form, Program brochure, Program logo, etc.)
- Mentioning Illinois Solar for All or ILSFA while performing customer acquisition outreach, including any statements implying the availability of program incentives through outreach
- Partnering with an Approved Vendor and/or Designee in good standing to work around Program suspension

NOTE: As stated above, the IPA will determine on a case-by-case basis whether a Designee suspended from participation in ILSFA will also be suspended from participation in the IPA’s Adjustable Block Program (also known as Illinois Shines). A Designee suspended from the Adjustable Block Program will automatically be suspended from ILSFA.

The Program Administrator will maintain a public report of disciplinary actions taken involving Approved Vendors/Designees. This public report has been developed in the interests of fairness, transparency, and awareness to help ensure that all Approved Vendors/Designees are aware of disciplinary decisions, and thus do not unknowingly partner with Approved Vendors/Designees that are suspended from the Program. The report also provides information to potential project hosts, installers, and other interested parties.

## 3.7. Changes to Approved Vendors and Projects

### MULTIPLE APPROVED VENDORS

In a case where one Approved Vendor submits a Part I application for a project, and then a second Approved Vendor submits a new Part I application for a project at the same location at any point in the review process prior to the submission of the batch to the ICC, the Program Administrator will proceed as follows in attempting to resolve the potential conflict:

The Program Administrator will first investigate (including potentially contacting the site host) whether there is an intent that the multiple project applications be for separate, co-located projects (and if so, whether the co-location would be allowed under Program terms and conditions).

- If co-location is intended and feasible, then the Program Administrator will allow for co-location.
- If co-location is not both intended and feasible (i.e., if the two applications appear to represent the same project), the Agency will review the documents submitted with the Part I applications to determine which Approved Vendor is premising its control of RECs on an earlier-executed site control agreement that has not lapsed (or, if both Approved Vendors rely on the same site control agreement, then which Approved Vendor has an earlier-executed REC control agreement that has not lapsed); this Approved Vendor will be presumed to be the proper representative of the project.
- An Approved Vendor with a later-executed site control or REC control agreement (as applicable) will be given an opportunity to furnish documentation showing that the earlier-executed

instrument was properly terminated prior to that Approved Vendor's Part I ILSFA application. If acceptable documentation is provided (subject to confirmation with the other Approved Vendor), then the application from the Approved Vendor with the later-executed agreement would proceed (subject to any other review and approvals of the application).

## CHANGE OF APPROVED VENDORS

A project that has been waitlisted or otherwise not yet selected for a REC Contract may change its Approved Vendor. This switch of Approved Vendors may be for an individual project that is a subset of a larger batch.

While it is not necessary to seek Program Administrator approval in advance of commencing this transaction, the Approved Vendor transferring the project and the Approved Vendor receiving the project ("Transferee") must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ABP application. The documentation also must show that the project host (and the project owner, if different) consent to the change of Approved Vendor.

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being taken by the Transferee AV. The co-located pricing provision will only be applicable if the Illinois Commerce Commission's approval of the second project is within one year or less of the Commission's approval of the first project. If the first project has not yet received Commission approval at the time of the second project's approval, then the co-located pricing provision will apply.

## SALE OF AN APPROVED VENDOR

Additionally, the sale of an Approved Vendor is permissible. A change in ownership of the Approved Vendor (e.g., the sale of an entire LLC to a new entity) with no change to the AV/project pairings does not require consent, but does require the Approved Vendor to alert the Program Administrator to the change and provide documentation of the sale.<sup>12</sup> The new owner will need to submit an Approved Vendor application with details specific to its ownership of the LLC (see Section 2 for more detail on Approved Vendor requirements). Additionally, the new owner must contact the REC contract Buyer (the contracting utility or the IPA) to update its contact and banking information for the respective REC contracts with the Buyer.

## SALE OF A PROJECT

A sale of the project itself (or a majority equity share in the project) that results in a new system owner but not a new Approved Vendor is allowed while the project remains unselected for a REC Contract. In such a case, the Approved Vendor should contact the Program Administrator in order to update the ownership data for the project in the ILSFA portal. This project ownership change would not change any

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<sup>12</sup> The seller's Approved Vendor profile and banking information will not be visible to the new owner of the Approved Vendor after a sale.

previous determination that the project was co-located, and it could, if applicable, cause the project to be newly considered co-located. The co-located pricing provision will only be applicable if the Illinois Commerce Commission's approval of the second project is within one year of the Commission's approval of the first project. If the Commission has not yet approved the first project at the time of the second project's approval, then the co-located pricing provision will apply.

## 4. Project and Participant Eligibility

Eligibility for ILSFA 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.

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.

NOTE: A single project can be submitted to only one ILSFA sub-program in a given program year.

### 4.1. Illinois Solar for All: Residential (Small and Large)

#### PROJECT ELIGIBILITY

- Residential (Small and Large) systems are installed onsite on residential properties.
- Systems are installed behind a customer's meter and are used to offset the load of one or more qualifying residential households occupying that property.
- Occupants receive the value of energy produced by the installed system through:
  - Net metering or avoided usage connected directly to individual customer meters; or
  - Indirect benefits such as 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, with the exception of Residential Solar (Large) projects (projects on properties with five or more units) where the participant purchases the system and Community Solar projects that are organized as cooperatives, pay no upfront costs (defined as prior to project energization) and any ongoing costs and fees are less than 50% of the value of the energy generated by the system each year. 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.

#### PARTICIPANT ELIGIBILITY

- For single-family homes, households must verify that their household income is 80% or less of Area Median Income (AMI).
- For two- to four-unit buildings, at least two of the households must verify that their household income is 80% or less of AMI.



- For master-metered five-unit and larger residential buildings, either 1) at least 50% of the tenants in the building must be verified as income-eligible, or the building must be demonstrated to meet the definition of “affordable housing” contained in the Illinois Affordable Housing Act<sup>13</sup> 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. The income qualification level required for participation in these programs is lower than income requirements for the Illinois Solar for All Program.
- See Section 6, Project and Participant Verification, below for prescribed methods of verification.

## ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the Residential Solar sub-programs may qualify as an energy sovereignty project, and thus be eligible for the energy sovereignty REC adder, if they exhibit either:

- Contract between Approved Vendor and customer guaranteeing system ownership by the customer within the first 7 years of energization and detailing cost and timing of transfer of ownership, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance, or
- Immediate participant ownership of the full or majority installation value.

## PARTICIPANT REFERRALS

A stakeholder engagement process completed in early 2021 informed the creation of a referral process for interested 1-4 unit building owners.

1. Approved Vendors interested in participating in the referral program should submit a 1-4 unit building offer to the Program Administrator via [info@illinoisfsa.com](mailto:info@illinoisfsa.com) and agree to adhere to the applicable consumer protections (detailed below in Section 7.1). Approved Vendors wanting to be listed on the ILSFA Small Residential Offers Document must have completed a small residential project ILSFA project prior to being added to the document.
2. Interested participants will indicate interest to the Program Administrator via the ILSFA website, email, call center, or other available communication channels.
3. Interested participants will be informed of the number of Approved Vendors participating in the referral program in the participant’s area and their associated offers. Interested participants will also be informed of how many outreach attempts they can expect from Approved Vendors if they elect to participate in the referral process. If no applicable Approved Vendors are available (in the geography, for the site/roof type, etc.), the Program Administrator will check monthly and follow up with the potential participant if/when an applicable Approved Vendor becomes available.
4. Interested households will be pre-screened for income eligibility before participating in the referral process. This “pre-screening” consists of asking the potential participant to state their household income and household size.

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<sup>13</sup> 20 ILCS 3855/1-75(c)(1)(F).

5. Participants in the referral process will be asked to share basic information about their home (e.g., condition of the property's roof and type of electrical panel) to assess their site suitability. Interested households can then agree to have their information shared with Approved Vendors.
6. The Program Administrator will compile all referral requests that complete the pre-screening process and provide them to participating Approved Vendors on a weekly basis.

Interested participants can choose to have their income verification performed by the Program Administrator before or after participating in the referral process, at the participant's discretion. Participants can also choose to have their income verification completed by the Approved Vendor of their choice.

If participants choose to have the Program Administrator perform their income verification, they can do so in one of three ways. Individual members of the same household, over the age of 18, may use different options to determine household income eligibility.

- **Option 1:** Provide proof of enrollment in a qualifying third-party program such as LIHEAP and SNAP. More details about qualifying third-party programs are available in Section 6: Project and Participant Verification.
- **Option 2:** Income verification through a credit reporting agency. This option requires providing basic personal information such as name, full DOB, and address, and, in some limited circumstances<sup>14</sup>, social security numbers, to be entered in a credit reporting agency's secure portal.
- **Option 3:** Income Affidavit: A customer may use this form when income documentation is required but not available, in cases such as cash income or no income. The Income Affidavit can only be used in limited circumstances and cannot be used if you are able to utilize Option 1 or Option 2.

To participate in the referral program, Approved Vendors must have completed an ILSFA project prior to submitting a standard offer to the Program Administrator. Offers should identify the details of their service offering based on standard parameters. By submitting the standard offer, Approved Vendors agree to the following:

- Approved Vendors will contact the interested household within 5 business days of receiving a referral. Approved Vendors who will temporarily be unable to meet this expectation (due to vacation, illness, etc.) should notify the Program Administrator in advance.
- No information about the interested household may be shared with any third party (with the exception of subcontractors or ILSFA implementation partners for the sole purpose of responding to the referral). If the household does not respond to the Approved Vendor's outreach or declines services from the Approved Vendor, the Approved Vendor will not retain the information on the household.

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<sup>14</sup>The credit reporting agency requires a social security number if a tax transcript is requested. This information is entered directly into the credit reporting agency portal and is not stored. This approach is limited as much as possible.

- Calls and emails should be limited to four touches (in total) and be suspended immediately if the household asks not to be contacted again or declines services from the Approved Vendor.

The Program Administrator (or as appropriate, grassroots education organizations) may periodically follow up with participating households to assess their participation in the program. If that follow-up indicates that Approved Vendors are not complying with these requirements, Approved Vendors may be removed from the referral program at the discretion of the Program Administrator or face other disciplinary action. Participation in this referral process is discretionary for the potential participant and for Approved Vendors.

Aggregated, anonymous information about the number, type (e.g., single family, pitched roof, etc.), and geography of referrals will be shared with all Approved Vendors on a regular basis to inform decisions by Approved Vendors about new markets; after having successfully completed an ILSFA project, Approved Vendors may at any point submit a 1-4 unit building offer and agree to adhere to the applicable consumer protections to participate in the referral process. Approved Vendors who wish to submit a standardized 1-4 unit building offer should email [info@illinoissfa.com](mailto:info@illinoissfa.com).

## 4.2. Non-Profit and Public Facilities

### PROJECT ELIGIBILITY

- Non-Profit and Public Facilities sub-program projects are installed onsite on properties either (i) occupied by a qualified non-profit organization or (ii) occupied by a 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.
- Occupants receive the value of energy produced by the installed system through net metering or avoided usage connected directly to individual customer meters.
- Ongoing costs and fees are not to exceed 50% of the value of the energy generated by the system.
- The project meets all consumer protection guidelines and other program requirements.
- The Agency will also no longer allow distributed generation projects serving multifamily residential facilities to participate in the Non-Profit and Public Facilities sub-program since these types of projects qualify to apply for the Residential Solar (Large) sub-program
- ILSFA will not include public schools in the Non-Profit and Public Facilities sub-program after the 2022-2023 program year.<sup>15</sup>

### PARTICIPANT ELIGIBILITY

- Serves the energy loads of a building that is occupied by an organization (or in the case of a public facility, a department/agency) that is a Critical Service Provider (CSP) for the community (examples of CSPs are listed below).

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<sup>15</sup> Section 8.5.6.1 of the 2022 Long Term Renewable Resources Procurement Plan. Public schools will be phased out of the ILSFA program following the 2022-2023 program year.

- Is located within an IEC or EJC within the state of Illinois:
  - EJCs, or 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 block groups across the state. [A map and address look-up tool](#) is available for every address in the state. [An additional process is available](#) for representatives of communities to apply to have their geographic area designated as an EJC even if the program’s quantitative methodology did not so determine it.
- IECs, or Income-Eligible Communities, are defined as census tracts having a majority (50% or greater) of households at 80% or less of AMI. [A map and address look-up tool](#) are available for these communities.<sup>16</sup>
- Has sufficient connection to and input from the IEC or EJC members the non-profit or public entity 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.
- A qualified Critical Service Provider (CSP) is a non-profit or public entity that offers critical services to IECs or EJCs, including:
  - Advocacy organizations
  - Affordable housing providers<sup>17</sup>
  - 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

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<sup>16</sup> For the purpose of the ILSFA Approved Vendor Manual, Income-Eligible Communities are considered “low-income communities” per the 2022 Long-Term Renewable Resources Procurement Plan, “‘low-income community’ for this purpose is defined as a census tract where at least half of households are not exceeding 80% of AMI”; see: <https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/2022-long-term-plan-23-august.pdf#page=348>

<sup>17</sup> Note that Affordable Housing Providers is included in the list of Critical Service Providers only for anchor tenants in the ILSFA Community Solar sub-program.

- Immigration service providers
  - Job training and workforce development services
  - Law/legal centers (non-profit providing pro-bono services to IECs or EJs)
  - Libraries
  - Mental and behavioral health facilities
  - Municipal administration offices
  - Places of worship
  - Rehabilitation providers
  - Public schools<sup>18</sup>
  - Senior centers
  - Social service agencies (including unemployment and social security offices)
  - Transitional or supportive housing (including for teens and LGBTQ)
  - Women’s or children’s shelters
- Documentation of CSP status must be submitted by no later than the time of Part I application.
  - Other types of potential CSPs not found on this list can be reviewed by the Program Administrator on a case-by-case basis. Those considering submitting as an “other” CSP are advised to submit their requests as early as possible to the Program Administrator; these requests will be reviewed carefully and may not be granted. Requirements for CSP requests are outlined below.

#### REQUIREMENTS FOR CRITICAL SERVICE PROVIDER REQUESTS

If a prospective non-profit or public entity is not represented within the list of Critical Service Providers (CSPs) above, the Approved Vendor or that entity may submit a request for consideration of that entity as a CSP. That request should be in the form of a letter to the Program Administrator, which will review such requests on a case-by-case basis. Please note that only non-profits and public entities demonstrating a high degree of critical services provision to IECs or EJs will be designated as CSPs. The list of CSPs contained in the Approved Vendor Manual was developed through a process that included stakeholder feedback and is intended to be a comprehensive list of appropriate organizational types. The process of requesting consideration for other entities recognizes that there may be special circumstances where an entity type not on that list but may still be worthy of consideration as a Critical Service Provider based on their high degree of services to income-eligible community members. The Program Administrator must approve the request before an Approved Vendor submits a project application for that entity or the application will be deemed ineligible for consideration.

Letters requesting CSP status for non-profits and public entities must include all of the following:

1. A description of the services provided by the non-profit or public entity that it asserts should be considered critical services, and a description of the program(s) through which the non-profit or public entity offers those services. This should include the following, as applicable:
  - The nature of the critical services provided

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<sup>18</sup> Section 8.5.6.1 of the 2022 Long Term Renewable Resources Procurement Plan. Public Schools will be phased out of the ILSFA program following the 2022-2023 Program Year.

- The population served by the critical services (demographics, location, size, etc.)
  - The manner in which recipients access the critical services (i.e., application process, qualifications, enrollment period, etc.)
  - Who delivers the services (e.g., social worker, clinician, tradesperson, educator, etc.)
  - Whether the critical services are accessed onsite and, if not, where are the services provided/accessed (e.g., mobile services using trucks)
  - Critical services program (goals, origin/date program started, partner agencies/entities and roles, outlook)
  - Portion of the entity's work that is the provision of critical services. Please provide a description, if applicable, of the non-critical services provided by the entity.
  - Description of any costs to access services, and if there are differences in cost of services for income-eligible recipients.
2. An explanation of how the proposed PV system will bolster the impact and delivery of the critical services to the IECs or EICs.
  3. Supporting documentation such as relevant metrics demonstrating the impact of the critical services, as applicable.

In order to determine if the entity demonstrates a high degree of critical services provision to IECs or EICs the Program Administrator will review information provided in the request letter and accompanying materials. The Program Administrator's determination will be based on whether the prospective entity provides services that improve living conditions, financial status, environmental and health status, and other social welfare indicators. The review will consider the services offered, their alignment with and ability to meet identified needs, how accessible they are, and the organization's role, and impact in delivering the critical services. In general, the critical services should represent a majority of the activities performed by the organization. Where there are gaps in the information provided or questions about the request, the Program Administrator will send a written request for clarification.

The letter should be submitted on the letterhead of the non-profit/public entity and signed by an officer of the organization. It may be submitted directly by the entity or by an Approved Vendor with which the entity is working. Please submit the letter to the Program Administrator at least 30 calendar days in advance of a sub-program project submission window opening to allow for adequate review time. Once a letter is received, the Program Administrator will either approve the application or will communicate any deficiencies to the requesting entity within 10 business days. If the CSP request is denied, an appeal of that determination may be made to the IPA.

#### ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the Non-Profit and Public Facilities sub-program may qualify as an energy sovereignty project, and be eligible for the energy sovereignty REC adder, if they exhibit the following elements:

- Lease or PPA contract between Approved Vendor and customer guaranteeing system buyout by the customer within the first 7 years of energization, and
- Contract detailing information on the cost and timing of transfer of ownership, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance, or

- Evidence of majority-ownership of the system by the host from the outset

## 4.3. Community Solar

### PROJECT ELIGIBILITY

- 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.
- Participants, with the exception of non-residential anchor tenants, 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 Revised Plan) the applicant has partnered with regarding the location of, development of, and participation in the project as well as regarding the priorities and concerns of IE community members. This should include letters from those organizations to verify the partnerships.
  - A public entity may qualify as a community-based organization for this purpose, but only if the public entity meets the following requirements:
    - The public entity must represent a municipality or county (or school district, park district, etc.) in a municipality or county in the bottom 25% of the state by population.
    - The public entity must certify that no local community-based organizations exist that are capable of filling this role.
    - The public entity must provide the same showing of robust community engagement as a non-public entity would be required to show.
    - Public entities that have failed to act as community-based partners in a past project certification would be ineligible.
    - The public entity would be qualified as a “community-based organization” only in the context of one project application; the qualification would not be retained for a future project application (the public entity would need to demonstrate the same factors again). Finally, the public entity must provide ongoing reporting of its engagement approach, including public participation opportunities and disclosure of its approach to the project location selection (if applicable).

## PARTICIPANT ELIGIBILITY

- No single subscriber can have a share greater than 40%.
- A single anchor tenant that is not an income-eligible household (as defined below) will be allowed. In this instance, the application should describe that anchor tenant in detail. The anchor tenant's share will receive the applicable Adjustable Block Program REC price; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar price. The AV must identify the anchor tenant at the time of the Part I application; if not, the project will not be allowed to add an anchor tenant after the close of the project submission window or relevant cure period.
- Other than the anchor tenant, all subscribers must be income-eligible households (defined as residential households that verify as 80% or less of AMI) 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 tenant's subscription) as of one year after energization will receive no REC payments and Approved Vendors are not obligated to deliver those RECs.
- At least 50% of total energy produced, excluding the anchor tenant's share (e.g., if the anchor tenant's share is 30% of the project capacity, then at least 35% of total energy produced), must be allocated to income-eligible subscribers at the end of the first year after energization.
- Subject to the requirements above, any retail electricity customer in that utility's territory can subscribe to the remaining shares.
- ILSFA community solar projects can be awarded additional points during project selection based on the type of identified anchor tenant, as explained in the [Project Selection Protocol](#) including: if the project is located in an IEC and/or EJC, if the anchor tenant is a non-profit or public facility or if the anchor tenant is a Critical Service Provider. (Note that for the purpose of the ILSFA Community Solar sub-program, Affordable Housing Provider is also included in the list of Critical Service Providers outlined in Section 4.2 above.)

Note, in the course of marketing, soliciting and subscribing customers, Approved Vendors and/or their Designees, subcontractors, or agents, may obtain confidential, proprietary, or otherwise generally private information from subscribers or potential subscribers. This information may include the subscriber or potential subscriber's utility account number, utility account customer of record name, meter number, or other confidential information. Approved Vendors, Designees, subcontractors, and agents shall maintain the confidentiality and security of all such information received from subscribers and potential subscribers. Furthermore, Approved Vendors, Designees, subcontractors and agents shall not release such information to any other person or entity without the written consent of the subscriber or potential subscriber. This restriction shall not apply to the necessary sharing of such information between an Approved Vendor and its Designees, subcontractors, or agents in order to enroll a community solar subscriber, nor shall it apply to requests from the Program Administrator and/or the Agency as needed for program administration. Approved Vendors and Designees who violate this program requirement, either directly or through the conduct of a subcontractor or agent, may be subject to disciplinary action, including possible suspension from the ILSFA Program.



## ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the IECS sub-program may qualify as energy sovereignty projects and be eligible for the energy sovereignty REC adder, if they exhibit the following elements:

- For ownership model:
  - Lease or PPA contract between Approved Vendor and customer guaranteeing ownership of portions of community solar system by the customer within the first 7 years of energization
  - Contract detailing the cost and timing of transfer of ownership of the customer's share of the community solar system, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance
- For cooperative model:
  - Contract specifying that subscription payments paid by customers are considered member fees for ownership shares in a community solar cooperative on behalf of eligible participants
  - Contract providing details on financial benefits of ownership beyond electricity cost savings and procedures for selling ownership shares, including guarantees for allowing the selling of shares to other co-op members or to the co-op itself
  - Contract detailing information on the cost and timing of transfer of ownership, warranties and insurance, the cost of ongoing monitoring, maintenance, and insurance, and, if applicable, agreement to pay a nominal fee to join the community solar cooperative

## 5. Participant Savings Requirements

ILSFA requires 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. However, if a project in the Non-Profit and Public Facilities sub-program is applying for the federal Investment Tax Credit in relation to the project installation, or if it will apply for the Investment Tax Credit, then the savings level for the participating host of the project must be 65% of energy value rather than 50%.

The method used 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). These calculations are shown on the Disclosure Forms and Savings Calculator as provided by the Program Administrator and vary based on the contract terms.

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.

$$\text{Total Energy Value} - \text{Total Costs and Fees} = \text{Savings Dollars}$$

The Savings are 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 (with the exception noted above).

$$\frac{\text{Savings Dollars}}{\text{Total Energy Value}} = \text{Savings \%}$$

## 5.1. Term of Savings

The Savings will be calculated twice: for the first year and for the term of the participant'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, except in the case of a non-profit or public facility project where the project's owner is applying for the federal investment tax credit, in which case the savings level for the participating host must be 65% 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 the first year and Total Energy Value projected for the first year. Savings is then calculated using total costs and fees for the 15-year term and Total Energy Value projected for the 15-year term. Both savings and costs are calculated on the Disclosure Form based on inputs from the Approved Vendor.

For system purchase or if, for example, a 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, 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 kWhs 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 taken into account.

Any additional, non-recurring fees (which cannot be incurred prior to energization), like a loan origination fee or an automated clearinghouse fee, are 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.

Community Solar projects that qualify as energy sovereignty projects may charge a nominal one-time fee to customers to join the community solar facility, either by the community solar cooperative or project owner.

## 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 kW 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%).

### First year savings:

- Total costs: 3,000 kWh x \$0.05 = **\$150.00**
- Total Energy Value: 3,000 kWh x \$0.1248<sup>19</sup> = **\$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, 0.5% annual production degradation, 1.7% annual energy rate escalation, and 1.0% annual customer rate escalation.

- Total costs: 43,459 kWh x \$0.05<sup>20</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, 0.5% annual production degradation, 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**

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<sup>19</sup> A sample rate is used here (and in the full-term savings examples below) to demonstrate potential savings. Approved Vendors should use the rate given in the disclosure form based on the utility territory in which the project is located or, for customers using an ARES or enrolled in an hourly pricing program, an average rate based on 12 months of customer bills may be used. For NP/PF customers, the average rate based on 12 months of customer bills must be used. Where a facility does not have a year of electric usage history (e.g., a new building), the Approved Vendor should use the rate of the new service and estimate kWh usage from the facility's architect/engineer. The Approved Vendor should provide the methodology for load estimation in the project application.

<sup>20</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).

- 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%**

**TABLE. 5.1. COST AND SAVINGS CALCULATION EXAMPLE**

<u>Year</u>	<u>Annual kWh</u>	<u>Energy rate per kWh</u>	<u>Energy value</u>	<u>Customer rate per kWh</u>	<u>Customer payments</u>	<u>Customer Savings \$</u>	<u>Customer Savings %</u>
<u>1</u>	<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>
<u>2</u>	<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>
<u>3</u>	<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>
<u>4</u>	<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>
<u>5</u>	<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>9</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>
			<b><u>\$6,109.47</u></b>		<b><u>\$2,329.66</u></b>	<b><u>\$3,779.81</u></b>	<b><u>61.9%</u></b>
<i>Buyout Fee at End of Contract</i>							
	<i>Term</i>				<i>\$1.00</i>		
<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>

<u>20</u>	<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>
<u>21</u>	<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>
<u>22</u>	<u>2,700</u>	<u>\$0.1778</u>	<u>\$480.13</u>	<u>\$0.0616</u>	<u>\$0.00</u>	<u>\$480.13</u>	<u>100.0%</u>
<u>23</u>	<u>2,687</u>	<u>\$0.1808</u>	<u>\$485.85</u>	<u>\$0.0622</u>	<u>\$0.00</u>	<u>\$485.85</u>	<u>100.0%</u>
<u>24</u>	<u>2,673</u>	<u>\$0.1839</u>	<u>\$491.64</u>	<u>\$0.0629</u>	<u>\$0.00</u>	<u>\$491.64</u>	<u>100.0%</u>
<u>25</u>	<u>2,660</u>	<u>\$0.1870</u>	<u>\$497.50</u>	<u>\$0.0635</u>	<u>\$0.00</u>	<u>\$497.50</u>	<u>100.0%</u>
			<b><u>\$10,828.97</u></b>		<b><u>\$2,330.66</u></b>	<b><u>\$8,498.31</u></b>	<b><u>78.5%</u></b>

## 5.5. Determining the Energy Rate

A critical factor in determining customer savings is the customer’s Net Metering Rate. For Residential Solar customers, the rate per kWh is listed on the Disclosure Form for those customers not using an Alternative Retail Electric Supplier (ARES) and not enrolled in an hourly pricing program. Similarly, the Community Solar Disclosure Form also lists the rate per kWh for each utility. The Program Administrator will update the rate per kWh as needed based on the utilities’ rate update schedules. Any rate updates will be announced at least 30 days prior to implementation.

For participants using an ARES or enrolled in an hourly pricing program, and for participants of projects in the Non-Profit and Public Facilities sub-program, an average rate based on 12 months of customer bills must be used. Where a facility does not have a year of electric usage history (e.g., a new building), the Approved Vendor should use the rate of the new service and estimate kWh usage from the facility’s architect/engineer or another source, such as a utility estimate. The Approved Vendor should also provide the methodology for load estimation in the project application. This method may also be used for any participant to provide a more accurate projection of cost and savings.

For participants whose electricity is supplied through their municipality or a co-op, the Approved Vendor should likewise use the average rate based on 12 months of participant bills. If the Approved Vendor is not able to use the 12-month average, the statewide average of \$0.1248 per kWh can be used.

When establishing the Net Metering Rate using participant bills, the average of 12 consecutive months of participant bills within the last two years should be used. The rate should include all volumetric charges (costs per kWh), including for Supply, Transmission, Delivery, and volumetric taxes. The sum of these cost components should be averaged per kWh over this 12-month period to get the average participant rate. Non-volumetric taxes and fees should not be included.

For Community Solar participants, only the Supply rate is averaged over 12 months. For those participants who have a commercial rate of 100 kW or more, Supply and Capacity are averaged over 12 months.

For multifamily buildings that are multi-metered, with bill credits sent to tenants’ electricity bills, the Net Metering Rate used should be calculated in the same way, but only the Supply rate should be used based on the property owner’s current rate. For master-metered building or for multifamily buildings

where the installation will serve only the common load, the full retail rate will be credited, and the average Net Metering Rate will be calculated accordingly. For such a building where the central utility account has already elected to receive the “smart inverter rebate” under ComEd’s Rider DG Rebate or Ameren Illinois’ Rider CGR), net metering rates will be calculated using only the Supply rate.

In general, the intent is that an accurate projection of the customer’s Net Metering Rate should be used in calculating bill credits and savings.

## 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 Residential Solar 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. Note that, when a master-metered building is a community solar subscriber, the property owner is required to demonstrate that the required savings value is being passed on to tenants in order to be considered an income-eligible residential household and have the RECs associated with its subscription share paid at the ILSFA Community Solar price. Approved Vendors are required to submit income verification for tenants of a master metered building following the same guidelines outlined in Section 6.3 of this manual. A master-metered building may participate as an anchor tenant without this requirement and receive the applicable Adjustable Block Program REC price.

When Residential Solar projects are installed on master-metered buildings, the value is calculated in the same way as any other Residential Solar 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. In these situations, the Approved Vendor should consult with the Vendor Manager to ensure that provision of tangible benefits is verifiable and easily managed. The proposed tangible benefits should be quantifiable and verified through supporting documentation such as dated and paid invoices/bills that tie back to leases, scopes of work, services, or goods that comprise the tangible benefits provided to tenants.

If 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, their value, and the dates of the services.

- 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.

To encourage Energy Sovereignty, an additional \$10 per REC will be added for on-site projects that result in ownership by the customer, such as through an early buyout of a lease or PPA.

These incentive payments are intended to be sufficient to provide tangible economic benefits to participants through enabling project developers to eliminate upfront costs to the participants for the installation of photovoltaic projects.

## 6. Project and Participant Verification

### PARTICIPANT DATA COLLECTION OVERVIEW

ILSFA 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 counting toward eligibility (minimum is 50%), all subscribers to Community Solar projects and all non-profit or public entities receiving benefits through ILSFA-energized systems. A Certification and Consent Form, the affidavit whereby the applicant certifies that their income is less than 80% AMI, is required for each household. This data will be used for validation of eligibility as well as for measuring program performance, including program reporting and periodic participant satisfaction surveys. Applicant data is captured through the vendor portal at [www.IllinoisSFA.com](http://www.IllinoisSFA.com) as part of the project approval process during Part I of the project application. Subscriber data for Community Solar projects is submitted during Part II. Annual submissions are also required for additional subscriber data and qualified subscriber shares to be updated.

Prospective participants may also work with the Program Administrator to complete a Certification and Consent form and determine income eligibility. Prospective participants verified as income-eligible will receive an Income Verification Approval Letter and those eligible and interested in the Residential Solar (Small) sub-program will be referred to Approved Vendors as described in the referral process in Section 4.1.: Residential Solar (Small and Large).

Approved Vendors working with prospective participants that have been verified as income-eligible through the Program Administrator will accept the prospective participant's Income Verification Approval Letter rather than the documentation described below. The Income Verification Approval Letter will need to be uploaded as described in section 8.4. Part I Project Approval: Customer Data.

### VERIFICATION PROCESS OVERVIEW

The verification process differs for each sub-program. Residential Solar and Community Solar projects require income certification by applicants, verification by the Approved Vendor, and validation by the Program Administrator. Since Income-Eligible Census Tracts (IECTs) are allowed as eligibility verification for Community Solar projects, and that method is least invasive to applicants, it will be prioritized for projects within 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 definitions and methods 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 program participants. Property owners are not required to live onsite.

## INCOME DEFINITION

For purposes of eligibility validation, income is defined as 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)
- Military Retirement Pay and Severance Pay
- 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

In addition to the income reported on the 1040 form, the following are also considered income for participation in ILSFA:

- Armed Forces allotments and allowances for housing, food, and clothing
- Cash gifts, including “GoFundMe” or other crowdfunding platforms
- Child support
- Commission checks (those that cover more than one month should be divided by the appropriate number of months to equal the 30-day income requirement)
- Educational Stipends
- Federal Black Lung Benefits
- Gambling proceeds and/or annual gross income should not exceed the annual 150% income eligibility
- General Assistance
- Regular payments from an Individual Retirement Account
- Online income (income received from online sales websites such as eBay for profit)



- Rental income – counted if the applicant rents property outside his/her own household or the applicant shares his/her home, e.g., one household unit with a boarder, lodger, and/or renter who is NOT related)
- Social Security income received for a spouse that resides in a nursing home/assisted living facility that is not paid directly and completely to the facility
- Strike benefits
- Support income received for guardianship and/or adoption of child(ren)
- 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
- 401k or retirement funds (one-time withdrawal)
- 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
- Sale of household items/assets at yard sales, on eBay, or other online sites is not 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
- Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970
- Tax refunds, including Earned Income Tax Credit (EITC) payments, whether received as an advance payment with wages or as part of an income tax refund

**Benefits:**

- Supplemental Nutrition Assistance Program (SNAP) benefits (Food Stamps)
- Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits
- Earned or Unearned 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:**

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

- Tribal per-capita payments up to \$2,000 per person per year, including payments 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

**Title I:**

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

**Title V:**

- Senior Temporary Training Program; payments received from the Community Service Employment Program funded under Title V of the Older Americans Act (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
- Disability Compensation
- Disability Pension
- Education and Training Benefits (like the Post-9/11 GI Bill)
- Housing Grants (like the Specially Adapted Housing (SAH) grant)
- Life insurance benefits from specific groups like the Servicemembers' Group Life Insurance Traumatic Injury Protection, Service-Disabled Veterans' Insurance and Veterans' Mortgage Life Insurance.
- The Compensated Work Therapy (CWT) Program.
- Additional payments received by military personnel for serving in a combat zone (Active Duty)

**Other:**

- Disaster relief payment made by federal, state, or local government or by a disaster assistance group
- Gifts in the form of non-cash assistance, e.g., food, clothing, rent, etc.
- Life insurance proceeds (whether made in installments or paid upfront)
- Non-cash income
- One-time insurance payments or compensation for injury
- One-time payments, excluding cash gifts, e.g., Death Benefits, Circuit Breaker Benefits, jury duty, retroactive child support, SSI, SSA, UCB
- 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 not-for-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

#### **Trade Readjustment Allowance Department of Labor- Employment and Training Administration**

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

#### **INCOME INCLUDED IN VERIFICATION**

For purposes of verification, the income of all members of the household who are over 18 years old and reported earned income will be considered, 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 projects within the Residential Solar and Non-Profit and Public Facilities sub-programs, property owners contract directly with the Approved Vendor or their agents or subcontractors for the installed solar. Property ownership must be verified by the Approved Vendor by obtaining a copy of at least one of the following: a) the current recorded property deed (e.g., warranty deed, quit-claim deed), b) current mortgage statement, or c) most recent property tax statement and submitting it to the Program Administrator as part of the Part I application. In the Residential Solar sub-programs, income must be verified for households counting toward eligibility (minimum is 50% for multi-family), whether they are

property owners or tenants, unless the project is using Whole Building Certification (see Section 6.1.1) to verify eligibility.

## 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 applicant income verification for Residential (Small) and Community Solar projects.<sup>21</sup> 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 Residential Solar and Community Solar projects that differ depending on sub-program. It is the responsibility of Approved Vendors to certify customer eligibility. While the Program Administrator acts as the central source for income validation, and potential subscribers to Residential (Small) and Community Solar projects may request to have their income verified by the Program Administrator directly, Approved Vendors have the primary responsibility of verifying the eligibility of individual applicants.

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 applicant or qualified building according to the methods prescribed below. Regardless of the verification method or sub-program, the applicant will first certify eligibility by completion and signing of the Certification and Consent Form. By signing this form the applicant is confirming their “household makes no more than 80% of area median income or less based on my County of residence and household size.” This form is available in the Approved Vendor portal and on the [ILSFA website](#).

Once the participant has certified to the Approved Vendor that they meet the income requirements, the Approved Vendor will collect the prescribed documentation to verify the eligibility of the applicant using one of the methods described below. Finally, the Program Administrator will then validate the findings by reviewing the Certification and Consent form and the supporting documentation to ensure all information is complete and meets the eligibility requirements.

The documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, Approved Vendors will need to redact PII on all documents before submitting them to the Program Administrator in the Approved Vendor Portal. More instructions for redacting PII are included in Sections 6.1 and 6.3 below.

### 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





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<sup>21</sup> The Non-Profit and Public Facilities sub-program does not qualify applicants based on income and requires a different approach to eligibility verification

multifamily energy efficiency, or tax-subsidized multifamily programs. Households that 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.

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

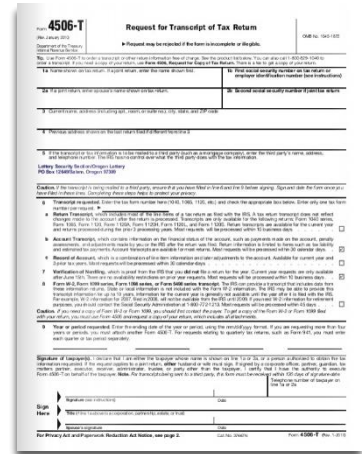
Qualifying Program	Supporting Documentation	Verification Level
Supplemental Nutrition Assistance Program (SNAP)		Award Letter from Illinois Department of Human Services Household
Low-Income Home Energy Assistance Program (LIHEAP)		LIHEAP Award Letter from household's local Community Action Agency or valid utility bill showing LIHEAP grant. Household
Illinois Housing Weatherization Assistance Program (IHWAP)		IHWAP Award Letter from household's local Community Action Agency Household
Medicaid	  	Benefit letter from Illinois Department of Healthcare and Family Services or the Illinois Department of Human Services OR Medical Card (front and back of the Medical Card issued within the last 12 months) Individual
U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers		HUD Award Letter or current statement Household

U.S. Department of Housing and Urban Development (HUD) Project-Based Rental Assistance		HUD Award Letter or current statement	Household
Income-Eligible Multifamily Energy Efficiency Programs		Eligibility based on qualified census tracts where 50% or more households are 80% or below AMI	All building tenants
Tax-Subsidized Multifamily Programs	 National Housing Preservation 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

Due to the fact that IHWAP sometimes adheres to income eligibility requirements that fall above the 80% AMI used by ILSFA, some households that are of a certain size and in a particular county may need additional follow up to ensure that they are income-eligible. The Program Administrator will still accept proof of LIHEAP or IHWAP approval as documentation of income eligibility, but with additional verification with DCEO to confirm household income eligibility to reduce inconvenience to the customer or the Approved Vendor. Vendors can see in what circumstances additional verification may be needed by referencing the highlighted incomes in [this document](#).

METHOD B: TAX TRANSCRIPT VERIFICATION

A third-party tax transcript vendor 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. A PDF displaying qualified incomes by Illinois county and household size is 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 aged 18 and over and send or upload to the third-party tax transcript vendor 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. The Approved Vendor must destroy hard copies of completed 4506-T forms within one week of the determination of applicant eligibility. Approved Vendor employees must be trained on proper handling and protection of these documents to maintain their confidentiality; only trained employees may handle the documents.



METHOD C: TAX RETURNS OR PAY STUBS

Electronic copies (which may include scans and/or photographs) of each household member’s prior year’s income tax forms or pay stubs from the two preceding calendar months must 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 only trained employees may handle the documents. 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 the determination of eligibility where a customer’s verification method includes the use of paystubs or tax return, the customer must also submit documentation to verify the household size. Acceptable documentation of household membership may include copies of a driver's license, utility bill, school registration, or, for children under the age of five, birth certificates or medical records. Additional documentation may be accepted on a case-by-case basis. These documents should be treated as sensitive information by the Approved Vendor and destroyed within one week of determination 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: INCOME-ELIGIBLE CENSUS TRACT

Community Solar projects allow for an additional household eligibility verification method using Income-Eligible Census Tracts (IECTs). There is an online map created for this purpose by the Program Administrator. This map and address look-up tool is available here and via the Approved Vendor portal at www.IllinoisSFA.com. Approved Vendors enter the address into the search tool and the message “This address qualifies” or “This address does not qualify” will be displayed. Eligibility is then validated by the Approved Vendor once data is entered into the portal for that household. Note: A Certification and Consent Form, the affidavit whereby the applicant certifies that their income is less than 80% AMI, will still be required.



## INCOME VERIFICATION FOR MULTIPLE ADULT HOUSEHOLDS

There are various methods to verify the income of a household with multiple adults. Households that qualify at the household or property level do not need to verify individual adult household member's income (e.g., households qualifying for Community Solar under IECTs, LIHEAP or IHWAP, HUD Project-Based Vouchers or Rental Assistance Vouchers, or Tax-Subsidized Multifamily Programs). Where verification of individual adult household members' income is required, each individual must be listed on the Certification and Consent form and must submit income documentation as outlined in Sections 6.1 and 6.3 below.

## VERIFICATION FOR ZERO INCOME OR NO INCOME DOCUMENTATION

Any and every adult claiming zero income or having no documentation of cash income must submit an Income Affidavit capturing income (or zero income) for at least the two preceding calendar months.

### 6.1. Residential Solar (Small)

The process listed below is for Residential Solar (Small) projects. See Section 6.1.1 below for the Whole Building Certification process for projects on properties with five or more units.

**Step 1:** The Approved Vendor will collect a completed Certification and Consent Form, which can be found on the ILSFA website, for all residential units in the building counting toward eligibility (minimum is 50%) and send/upload the forms to the Program Administrator, unless the project is on a building with five or more units that is demonstrating income-eligibility through Whole Building Certification (See Section 6.1.1). The Certification and Consent Form will capture key contact and demographic information including legal name of homeowner, 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 (including verification of building ownership), will be sent electronically to the Program Administrator via the Approved Vendor portal. Additionally, the owner of a multi-family building or a non-owner-occupied single-family home must sign an agreement that commits to maintaining affordability for the next 10 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 AMI using either the current [income-eligibility chart](#) or the online ILSFA Area Median Income verification tool and complete the Certification and Consent Form.

**Step A2:** The Approved Vendor will determine if the applicant 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: Tax Transcript Verification.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.),
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

**Step A4:** If the applicant provides Third-Party Qualifying Program documentation, the Approved Vendor will obtain a photocopy or scanned image and submit it to the Program Administrator electronically. The Program Administrator will review the documentation and an answer of accepted or not accepted will be returned to the Approved Vendor.

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

If the response is not accepted, the Approved Vendor will have the opportunity to submit updated or additional documentation or go to Method B: Tax Transcript Verification.

#### Method B

#### 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 aged 18 and over and send/upload to the third-party vendor, using fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable).

To protect participant information, the Approved Vendor shall not submit copies of the IRS form 4506-T or the tax transcript through the Vendor Portal. After the Approved Vendor submits the IRS form 4506-T through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B2:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B3:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to Approved Vendor.

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

If the response is not accepted or if the information cannot be provided by the third-party tax transcript vendor, the Approved Vendor will move to Method C.

Method C	Tax Return or Paystub Verification
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**Step C1:** The Approved Vendor will collect the most recent income tax returns or most recent paystubs capturing the two previous months' earnings for all household members aged 18 and over. When using paystubs, these must include documentation for each household member claimed on the Certification and Consent Form.

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

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes.),
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or paystub was issued

**Step C3:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to Approved Vendor.

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

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. 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. The Approved Vendor may formally appeal any rejection of income verification to the IPA.

The Approved Vendor on behalf of the applicant will have 2 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.

All tax or pay documentation in the possession of the Approved Vendor will be destroyed after applicant eligibility is determined.

#### **6.1.1. WHOLE BUILDING CERTIFICATION**

Whole Building Certification is the process of determining the eligibility of a building with five or more residential units. Eligibility can be met by one of the following methods:

- Submitting rent rolls showing that at least 50% of the units pay rent at or below the HUD Fair Market Rent Prices for the county in which the property is located.
- Showing the property meets the definition of Affordable Housing under the Illinois Affordable Housing Act.
- Providing documentation to confirm the property qualifies for one of the following:
  - U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers
  - Project-Based Rental Assistance
  - Income-Eligible Multifamily Energy Efficiency
- Letter confirming building is operated by an Illinois public housing authority/agency.

The owner/representative of the property must complete the “Income-Eligible Certification and Consent (“Certification and Consent”) for Whole Building Certification” Form. This form captures the number of units and key contact information including legal name of property owner/representative, complete address, and verification method. This completed form, along with the list of current residents (if required) and verification documentation prescribed (including verification of building ownership, if applicable), will be sent electronically to the Program Administrator via the Approved Vendor portal.

## **6.2. Non-Profit and Public Facilities**

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

### **LOCATION VERIFICATION**

The Non-Profit and Public Facilities sub-program eligibility criteria provide two paths to qualify the property by location. The property must be in either a qualifying ILSFA EJC or IEC.

**Environmental Justice Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Environmental Justice Community Mapping Tool](#).

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

**Income-Eligible Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Income-Eligible Census Tract Mapping Tool](#).

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 ILSFA.

## ORGANIZATIONAL ELIGIBILITY

To qualify for the Non-Profit and Public Facilities sub-program, projects must meet organizational eligibility criteria, including 1) satisfying the definition of Critical Service Provider (CSP) and 2) demonstrating the required level of community engagement. For more information, see Section 4.2.<sup>22</sup>

**Step 1:** Verification as a CSP 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 not accepted.

**Step 2:** The Approved Vendor will ensure the Non-Profit/Public Facilities Certification and Consent Form is complete. Documentation of community engagement is required, demonstrating the applicant institution's engagement with the IEC or EJC being served. Documentation must include both:

1. 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.

Additionally, for a non-profit organization or public entity that does not own its building, the building owner must complete the ILSFA Program Qualified Tenant Agreement. This document confirms that the building owner has granted permission to the Approved Vendor to apply for ILSFA and that the owner

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<sup>22</sup> Note that starting with Program Year 3 (2020-2021) eligibility is dependent on satisfying BOTH the definition of Critical Service Provider and demonstrating the required level of community engagement, this is a change from prior program year requirements and is based on the changes in Section 8.5.6.1 of the Revised Plan.

will continue to lease the building to the current tenant or a qualifying non-profit/public entity tenant for a total of five years.

For a public facility, the building must host a department/agency that is a Critical Service Provider as defined in Section 4.2 of this manual.

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 not accepted.

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

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. 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. The Approved Vendor may formally appeal any rejection of an application to the IPA.

The Approved Vendor on behalf of the applicant 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.

## 6.3. Community Solar

### PROJECT ELIGIBILITY

As discussed in Section 4.3 above, Community Solar projects must provide evidence of community partnerships at the time of Part I project application. Where required, a document upload option will be provided for this element, (i.e., documentation of 100% income-eligible subscriber ownership, as well as a letter of intent from the intended anchor tenant).

### SUBSCRIBER ELIGIBILITY

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

**Step 1:** The Approved Vendor will collect a completed Household Certification and Consent Form from each household counting toward eligibility (minimum is 50%), unless the project is on a building with five or more units that is demonstrating income eligibility through Whole Building Certification (See Section 6.1.1) and send/upload it to the Program Administrator. This form will include an applicant's certification that they currently qualify based on income eligibility requirements of 80% or less AMI for the household.

**Method D** Income-Eligible Census Tract

**Step D1:** The Approved Vendor will enter the applicant's household address into the ILSFA Income-Eligible Community Mapping Tool.

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

If the response is not accepted, the Approved Vendor will move to Method A.

**Method A** Third-Party Qualifying Program Verification

**Step A1:** The Approved Vendor will determine if the applicant 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: Tax Transcript Verification.

**Step A3:** 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 not accepted will be returned to the Approved Vendor within one week.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes).
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

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

If the response is not accepted, the Approved Vendor will go to Method B: Tax Transcript Verification.

**Method B** Tax Transcript Verification

**Step B1:** The applicant will certify that they qualify based on AMI using either the current [ILSFA Area Median Income worksheet](#) and complete the Household Certification and Consent Form.

If the applicant household does meet income eligibility, proceed to Step B2.

If the 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 third-party tax transcript vendor, using fax, email, or custom interface (Note: wet or e-signatures via secure email link are acceptable).

The Approved Vendor shall not submit copies of the IRS form 4506-T or the tax transcript through the Vendor Portal to protect participant information. After the Approved Vendor submits the IRS form 4506-T through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B3:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B4:** The Program Administrator will compare income level to 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

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

If the response is not accepted or if the information cannot be provided by 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 the two previous calendar months' earnings for all household members age 18 and over. When using paystubs, documentation for the presence of each household member claimed on the Certification and Consent Form must be included.

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

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved



Vendors will redact PII on all documents before submitting to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income number, taxpayer identification number, and patient identification numbers.
- Full date of birth (Note that the Certification and Consent form requests date of birth -- please use the MM/YYYY format, which is sufficient for verification purposes).
- Financial account numbers, such as bank accounts.

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or paystub was issued

**Step C3:** The Program Administrator will compare total household income level to 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

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

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. 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 ILSFA, the Approved Vendor may formally appeal to the IPA.

The Approved Vendor on behalf of the applicant 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

All tax or pay documentation in possession of the Approved Vendor will be destroyed after eligibility is determined.

## COMMUNITY SOLAR SUBSCRIBERS, SHARES, AND ANNUAL SUBSCRIBER VERIFICATION

Community Solar projects require that a minimum of 50% of the total system size (excluding any share subscribed to by an anchor tenant) be allocated to qualified households by one year after energization. The share of Community Solar RECs paid for at the ILSFA Community Solar REC price upon energization is determined by the total system share to which qualified income-eligible households subscribe. An anchor tenant that is a non-income-eligible residential household, non-profit and public facility or a business would receive payment for RECs at the Adjustable Block Program Community-Driven

Community Solar REC price for its subscription share.<sup>23</sup> A one-time payment for the full contract value, determined on this basis, will be made shortly after energization.

One year after energization, Approved Vendors will submit annual reports for each Community Solar project (as detailed in the Renewable Energy Credit Management section of this manual). These reports require data reporting for all participants, including changes in share for existing subscribers and new subscribers, along with eligibility verification data for all new subscribers. The quantity of RECs paid for and thus contractually committed will be adjusted based on subscription shares shown in the first year's annual report (this will be the only adjustment), and a commensurate payment adjustment relative to the prior contractual payment will be made.

The Program Administrator will validate each new participant's eligibility 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 tenant's share, if any) be allocated to income-eligible households must be met at this time. 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).

## 6.4. Data Management and Validation

Household and Non-Profit/Public Facilities Certification and Consent Forms contain applicants' certification of eligibility for their respective sub-program. The Approved Vendor uses these forms as documentation that verifies eligibility and shares them with the Program Administrator for validation. The AV submits the form to the Program Administrator via the Approved Vendor portal during data entry for Part I project application, except in the case of the Community Solar sub-program, where the form is submitted as a part of the Part II application. Data is collected and transferred for each program applicant.

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 Residential Solar projects where multiple household members 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 hard copy documentation must be destroyed by the Approved Vendor within one week of eligibility being determined. The Program Administrator will retain required information digitally in compliance with state document retention requirements.

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<sup>23</sup> Note, this represents a change from the first two program years, when non-profit or public facility anchor tenants could receive REC payments at the ILSFA Community Solar price.

# 7. Marketing and Consumer Protection Requirements

## 7.1. Consumer Protections

In addition to technical system requirements, Approved Vendors in ILSFA must work within prescribed guidelines that govern their interaction with the marketplace and potential and actual program participants. Communities with higher concentrations of lower-incomes 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.

ILSFA consumer protection requirements are provided in detail in the Consumer Protection Handbook. Consumer protections include requirements that the information shared with participants is clear and accurate to ensure a transparent and positive experience for participants. Approved Vendors are required to indicate their adherence to the Consumer Protection Handbook 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. Refer to the IPA Consumer Protection Handbook <https://www.illinoissfa.com/app/uploads/2022/08/Consumer-Protection-Handbook-7.14.22.pdf> ILSFA also developed a [Program Resources Guide](#) cataloging several federal, state, local, and utility-sponsored sources of assistance for energy efficiency, energy bill payment, and home maintenance..

### CONTRACT REQUIREMENTS

Approved Vendors and their agents (including installers and marketers) must meet a specified set of contract requirements in their installation contracts (for Income-Eligible Residential Solar or NP/PF projects) or subscription contracts (for Income-Eligible CS projects). Approved Vendors will be required to attest that these contract requirements were satisfied at the time of submitting either a Part I application (for Income-Eligible Residential Solar or NP/PF projects) or a Part II application (for Income-Eligible CS projects). The IPA and Program Administrator reserve the right to request copies of these contracts.

- [Distributed Generation \(Installation\) Contract Requirements](#)
- [Community Solar \(Subscription\) Contract Requirements](#)

## 7.2. Program Informational Brochures

The Program Administrator has developed a standard informational brochure for each ILSFA sub-program. Approved Vendors are required to present the relevant standard brochure to all customers at the first point of in-person or online contact and again at the execution of their contract (further detailed below). The brochure has been added to the beginning of the Disclosure Form to simplify and

ensure compliance with this guideline. Approved Vendors may access and download these standard brochures at the following links:

- [Residential Solar \(Small and Large\)](#)
- [Community Solar](#)
- [Non-Profits and Public Facilities](#)

These standard informational brochures were developed by the Program Administrator with the IPA and cannot be adapted in any way. All participating Approved Vendors must sign a form acknowledging that they have received these standard brochures and understand that they cannot be changed in any way.

The standard brochures are presented in a frequently asked questions format to help answer anticipated questions from customers and potential customers. The brochures present information on the following topics:

- What is Illinois Solar for All?
- Who can participate?
- How much can I save with ILSFA
- What are the financing and ownership (or participation) options?
- How does ILSFA ensure safe and fair business practices?

Approved Vendors can also create their own ILSFA marketing materials that are targeted to their audience, program, offers, and location. All Approved Vendor marketing materials must adhere to ILSFA content and branding criteria outlined in Sections 7.3 and 7.4. Approved Vendor marketing materials must also be submitted to and be approved by the Program Administrator. (See [Program Administrator Review Process](#) for more information.)

However, the ILSFA standard brochures must be presented to customers in all cases, regardless of other marketing materials used.

**At first contact:** Approved Vendors must provide the relevant Informational Brochure to customers. There are three Informational Brochures for ILSFA—one for Residential Solar (Small and Large), one for Community Solar, and one for Non-Profits and Public Facilities. Each Informational Brochure is available in English and Spanish.

If the first contact between an Approved Vendor and the customer occurs via telephone or direct mail, the standard brochure should be included at the first (if any) follow-up that takes place in person or online.

**At execution of contract:** The Approved Vendor or Designee must provide a copy of the applicable standard Disclosure Form, with all relevant fields completed, to the customer, including the relevant Informational Brochure attached as the first two pages. The Informational Brochure and Disclosure Form must be provided in their entirety and not be edited or modified. For in-person contract execution, the agent must review the Disclosure Form with the customer and provide the opportunity to ask questions. For online contract execution, the platform must provide a phone number or online chat function for customer questions.

**Delivery:** The standard 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

The ILSFA brand guidelines were created to help Approved Vendors market the program consistently in all materials. Correct and consistent usage of all brand elements, including the logo and messages, is vital to the quality and integrity of the ILSFA brand.

### ILSFA LOGO

Approved Vendors can use the ILSFA logo on marketing materials, both print and digital, that they create to market the program with advance approval by the Program Administrator. The ILSFA logo should only be used in materials that include information about the program.

The Program Administrator must approve all uses of the ILSFA logo in Approved Vendor marketing materials. See [Program Administrator Review Process](#) for more information.

To receive a copy of the logo and brand guidelines, please contact [info@illinoissfa.com](mailto:info@illinoissfa.com).

To maintain a consistent brand 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 only with prior Program Administrator approval.

ICON & WORDMARK



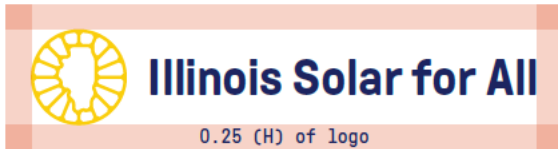
HORIZONTAL LOCKUP



STACKED LOCKUP



MINIMUM CLEARANCE



MINIMUM SIZE



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.

**PRIMARY**



CMYK:  
92,70,0,0  
RGB:  
28,36,96  
1C245E



CMYK:  
61,34,0,0  
RGB:  
80,98,229  
5062E5



CMYK:  
17,10,1,0  
RGB:  
212,217,250  
D4D9FA

**SECONDARY**



CMYK:  
0,7,93,0  
RGB:  
250,206,12  
FACE0C

**TERTIARY**



CMYK:  
51,0,46,0  
RGB:  
87,217,132  
57D984

**QUATERNARY**



CMYK:  
0,69,100,0  
RGB:  
224,78,34  
E04E22

**BLACK**



CMYK:  
0,0,0,100  
RGB:  
240,16,16  
212126

**WHITE**



CMYK:  
0,0,0,0  
RGB:  
255,255,255  
FFFFFF

## 7.4. Marketing and Sales Messages

The Program Administrator supplies the suggested language below to assist Approved Vendors in properly marketing the ILSFA program through outreach events, social media, email, and other marketing channels.

When Approved Vendors make initial contact with prospective participants through marketing activities, the Program Administrator recommends using ILSFA messages that are easy to understand (see Marketing Messages section). At this initial contact stage, the goal is to build awareness of ILSFA among prospective participants by connecting with their motivations (e.g., savings). As participants show more interest and their eligibility is determined, Approved Vendors can provide more technical details about the program, as detailed in the Sales Messages section.

All email or newsletter marketing of the ILSFA program must include the program logo, phone number (1.888.970.ISFA), website URL ([www.IllinoisSFA.com](http://www.IllinoisSFA.com)), and the following language:

“The Illinois Solar for All program is administered by Elevate Energy (Elevate) on behalf of the Illinois Power Agency, an independent state government agency.”

## MARKETING MESSAGES

### Program Description

Illinois Solar for All is a state program that brings the benefits of solar energy to income-eligible households, non-profit organizations, and public facilities. Eligible participants can receive affordable solar installations and save money on electric bills.

The State of Illinois offers this program to meet its renewable energy goals and to bring the expansion of solar energy to income-eligible communities. Illinois Solar for All ensures participants work with solar companies that use safe and fair business practices.

### Program Talking Points

- Illinois Solar for All is a state program that brings the benefits of solar energy to income-eligible households, non-profit organizations, and public facilities.
- Eligible participants can receive affordable solar installations and save money on electric bills.
  - Participants have no, or low, upfront costs because Illinois Solar for All pays incentives to solar companies to put in solar installations.
  - Ongoing costs and fees will not exceed 50% of the value of the energy generated from the solar installations.
- Illinois Solar for All ensures participants work with solar companies that use safe and fair business practices.
  - Illinois Solar for All vets and approves every solar company in the program. This ensures fair business practices and quality workmanship every step of the way.
  - The approved solar companies work with participants to plan and install solar panels and ensure cost savings. These companies have the necessary technical skills and follow stringent guidelines to ensure a transparent, safe, and positive experience for every participant.
- The State of Illinois offers this program to meet its renewable energy goals and to bring the expansion of solar energy to income-eligible communities.
  - With state and utility funding, Illinois Solar for All pays incentives to solar companies and passes the cost savings on to participants.
  - Illinois Solar for All was created by state legislation in 2016 to meet the state’s renewable energy goals. The Climate and Equitable Jobs Act expanded the program in 2021.
- Illinois Solar for All focuses on the people and communities who can benefit the most from the solar energy economy.
  - The program ensures that projects focus on areas that benefit the most from access to solar energy, including income-eligible and environmental justice communities.



- Illinois Solar for All reduces the impact of climate change in your community and across the state.

#### Social Media

#### Preferred Hashtags

- #ILSolarforAll
- #ILSFA

#### Sample Tweets

- Solar energy is within reach! #ILSolarforAll brings the benefits of solar to income-eligible households, non-profits, and public facilities. Contact us or visit [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to get started.
- We work with #ILSolarforAll to bring solar energy to residents and organizations in income-eligible communities. Contact us or visit [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to get started.
- Want to save on electricity bills? Go solar with #ILSolarforAll. We can help! Contact us or check out [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to see if you're eligible.

#### Sample Facebook, LinkedIn and Instagram Posts

- Solar energy is within reach! Illinois Solar for All is a state program that brings the benefits of solar energy to income-eligible households, non-profit organizations, and public facilities. Contact us or visit [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to get started. #ILSFA
- We work with Illinois Solar for All to bring solar energy to residents and organizations in income-eligible communities. Contact us or visit [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to get started. #ILSFA
- Want to save on electricity bills? Go solar with Illinois Solar for All. We can help! Contact us or check out [www.IllinoisSFA.com](http://www.IllinoisSFA.com) to see if you're eligible. #ILSFA

#### Sales messages

After introducing prospective participants to ILSFA, Approved Vendors can provide more technical details about the program in their sales conversations.

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. 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 and the Program Administrator will endeavor to respond within 5 business days.

Below are examples of acceptable and unacceptable statements Approved Vendors may make related to the program.

#### **WHAT IS THE ILLINOIS SOLAR FOR ALL PROGRAM?**

Illinois Solar for All (ILSFA) is a state solar program that benefits income-eligible and environmental justice communities in Illinois. With state and utility funding, Illinois Solar for All pays incentives to solar companies and passes the cost savings on to participants.

The program provides payments in exchange for 15 years of Renewable Energy Credits (RECs) generated by the solar systems. ILSFA enables the sale of RECs produced by qualified systems to Illinois utilities or to the Illinois Power Agency (IPA). Payments vary depending on the project type, size of the system, and where it is located.

Examples of statements companies **may** make related to ILSFA:

- “ILSFA is a state program that brings the benefits of solar energy to income-eligible and environmental justice communities.”
- “If you sign a contract with us and our application to ILSFA is approved, the solar panels 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 project will be part of the ILSFA program.”
- “As a subscriber to a community solar project that participates in ILSFA, you will earn credits on your electric bill that will save you money, based on your current supply rates.”
- “As a participant in ILSFA, you will see savings on your electric bill, based on your current supply rates.”

Examples of statements companies **may not** make related to ILSFA:

- “We represent the ILSFA program.”
- “The ILSFA program pays incentives to income-eligible households.”
- “The ILSFA program gives RECs to participants.”
- “The ILSFA program gives out free solar panels.”

#### WHAT ARE RECS AND WHY ARE THEY VALUABLE?

Renewable energy credits (RECs) are created when renewable energy generation systems, such as solar panels, generate electricity. However, 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 solar project 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 ILSFA will receive or use renewable 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 solar panels will help Illinois reach its renewable energy goals.”
- “Your solar panels will create energy from the sun.”
- “Your solar panels will contribute to the state’s development of solar power.”

Examples of statements companies **may not** 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.”

#### WHAT IF I’M NOT ELIGIBLE FOR ILLINOIS SOLAR FOR ALL?

Illinois residents who do not meet the income qualifications for Illinois Solar for All have another option to go solar. Illinois Shines is another state program that offers community solar projects and incentives for residential solar systems.

#### HOW MUCH CAN I SAVE WITH ILLINOIS SOLAR FOR ALL?

ILSFA requires that all eligible residential 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 residential solar participant installs a solar project that generates enough energy to save \$1,000 worth of net metering credits on the building’s electricity bill in the first year, their total costs and fees must not exceed \$500 for that year. Similarly, over a 15-year contract, if the system’s energy value is \$15,000, the participant’s savings must be at least \$7,500 over that period.
- If a property owner or manager of an eligible multifamily building that installs a solar 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 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 system generates.”
- “ILSFA participants see value from their solar system in different ways, depending on the program, property type, or system size.”
- “The ILSFA program ensures that your fees won’t be more than half of the value you receive through electricity bill credits.”
- “The ILSFA program requires that all subscribers see value from the energy the solar system generates.”
- “ILSFA community solar subscribers see value 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 your fees won’t be more than half of the value you receive through the electricity bill credits.”

Examples of statements that companies **may not** 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.”

## ENVIRONMENTAL JUSTICE COMMUNITY DESIGNATION

ILSFA sets a goal of allocating no less than 25% of incentives to projects located in environmental justice communities (EJC) across the state. EJs are designated using the [ILSFA mapping tool](#).

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

Households that reside within a designated EJC are not automatically eligible to participate in ILSFA because of this designation. Households must still qualify based on income. However, one of the eligibility requirements for non-profits and public facilities is being located in an EJC or LI community.

Approved Vendors or their agents and subcontractors will not state that participants will qualify for ILSFA based on residing in an EJC nor that customers will qualify for an ILSFA community solar project solely because they live in an [Income-Eligible Community](#).

Visit the [Environmental Justice section](#) of the ILSFA website for more information.

## 7.5. Identity and Affiliation Guidelines

### ACCURATE PORTRAYAL OF IDENTITY AND AFFILIATION

Marketing materials shall not refer to 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, the ICC, the IPA or the Program Administrator. An Approved Vendor may state that fact that it is an Approved Vendor under the IPA’s ILSFA program.

### USE OF UTILITY NAME AND LOGO

An Approved Vendor or its agent shall not use the name or logo of a public utility 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 a utility.

An Approved Vendor or Designee shall not utilize the name or logo of a public utility or consumer group in any manner that is deceptive or misleading. An Approved Vendor or Designee may use a utility name:

- (1) to describe the service territory in which an offer is valid, and
- (2) in describing or referencing distributed generation net metering or community solar subscription bill credits, provided that the use of the utility name does not inaccurately imply utility affiliation or endorsement.

Except for these two exceptions, an Approved Vendor or Designee shall not use a utility name, logo, insignia, graphics or wording that has been used at any time to represent a public utility, or its services, in marketing materials or to identify, label, define any of its offers, unless it has received approval of the use in advance by the Program Administrator. If there is any doubt as to the propriety of the use of a utility name, it is recommended that the entity seek Program Administrator pre-approval.

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.

## PARTICIPANT TESTIMONIALS

Approved Vendors may use testimonials to advertise participant experience. All testimonials must be provided by actual participants. All testimonials must include a disclaimer that user experience may differ. The IPA may request documentation to validate the accuracy of testimonials including verification of the identity of the testifier. Testimonials cannot include language that makes false claims. Testimonials cannot violate any of the above restrictions (for example, using a utility executive or government official to endorse an Approved Vendor).

The IPA and the ILSFA Program Administrator will address any requests for exceptions on a case-by-case basis.

## 7.6. Program Administrator Review Process

All marketing and promotional materials, printed or digital, produced by an Approved Vendor must be submitted to the ILSFA Program Administrator for review. This includes all materials related to the sale, financing, or installation of solar projects that apply to participate in ILSFA.

Approved Vendors are asked to agree to the terms of the ILSFA marketing guidelines outlined in sections 7.3 to 7.5. The ILSFA Program Administrator recognizes that Approved Vendors may have a need to adapt ILSFA messages or create new 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.

1. Approved Vendor should ensure all marketing materials are consistent with the ILSFA branding, messaging, and affiliation guidelines outlined in sections 7.3 to 7.5.
2. Approved Vendor should submit all marketing materials to the Program Administrator for review and approval three weeks prior to distribution. Send design files of marketing materials and proofs of promotional items to [info@illinoisfa.com](mailto:info@illinoisfa.com).
3. The Program Administrator will review the materials and provide feedback by email within one week of receiving the materials. The Program Administrator has the right to modify and edit original text, images, and layout in compliance with the ILSFA program brand guidelines. Please note that the recommended modifications may affect an Approved Vendor's planned distribution date.
4. The Approved Vendor must agree to make changes to marketing materials as requested by the IPA 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.

5. The Approved Vendor must submit the modified materials to the ILSFA Program Administrator for final approval before they are distributed.

## 7.7. Violation of Marketing and Consumer Protection Guidelines

If the Program Administrator believes an Approved Vendor, Designee, or other entity is not acting, or has not acted, in compliance with Program requirements in connection with the Program, the Program Administrator will notify the entity in an e-mail that:

- Identifies the problematic behavior
- Explains how the behavior is non-compliant with program requirements
- Requests more information about the issue
- Includes information on possible penalties or disciplinary action

With the limited exception of emergency situations requiring immediate action (as determined at the discretion of the IPA), no disciplinary determination (such as the suspension or revocation of the ability to participate as or on behalf of an Approved Vendor) will be made by the Program Administrator without first providing the allegedly offending party the opportunity to offer a written or oral explanation of the problematic behavior.

After a review of any such response, the Program Administrator will determine what discipline, if any, should apply to the Approved Vendor. All disciplinary determinations made by the Program Administrator will be communicated through a written explanation of the determination that includes the following:

- A brief explanation of the infractions for which the entity is being disciplined.
- A timeline of communications between the offending entity and the Program Administrator.
- Specific reference to which specific Program requirement(s)/guideline(s) the offending entity violated.
- An explanation of any disciplinary action, including what specific conduct is no longer permitted in connection with the Program through the length of the suspension.
- An explanation regarding how the Approved Vendor may appeal the disciplinary determination to the IPA and the deadline for submission applicable to any appeal.

To appeal a disciplinary determination to the IPA, an Approved Vendor or Designee should submit a document to the IPA at [IPA.Solar@illinois.gov](mailto:IPA.Solar@illinois.gov) on company letterhead that requests review of the Program Administrator's determination, explains why it believes the determination is in error, and provide any supporting information, documents, or communications. An appealing Approved Vendor or Designee may submit a request to the Agency for a stay of any disciplinary action pending a resolution of its appeal. The Agency may grant or deny this request and will consider, among other factors, the likelihood of participant harm from such a stay, whether the conduct that resulted in the suspension is ongoing, and the likelihood that the appealing entity may prevail. As part of its appeal, an Approved

Vendor or Designee may also suggest alternative resolutions or means to address violations (other than the disciplinary action that is being appealed).

The IPA may request additional information and materials from the Approved Vendor or Designee, and/or have a discussion with the Approved Vendor or Designee to learn more about the basis for the Approved Vendor's or Designee's position. The IPA will endeavor to issue final determinations on discipline, including supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information.

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 Approved Vendor will have two weeks to appeal the rejection in writing on company letterhead conveyed by email or postal mail. The IPA is the final authority for granting or rejecting an appeal.

If you have additional questions on topics that are not addressed here or seek clarity on a specific application of these guidelines, 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.

## 8. Project Submission Processes

### 8.1. Project Submission Process Overview

Note that 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 pre-determined project submission time window for each sub-program, to be announced by the Program Administrator. The initial project submission window timelines for the 2022-2023 Program Year are available [here](#). Please note that the batch process has been updated in the 2022 Plan and is further detailed below. A single project can only be submitted into one sub-program during a given program year. Application requirements must be completed and submitted during the project submission window as outlined in Section 8.4 of the Vendor Manual.

After each program year's initial project submission window, if funds for a given sub-program remain available, project applications will be accepted and reviewed on a first-come, first-served basis for the remainder of the program year. If annually allocated RERF funds in a sub-program remain at the end of

the program year, the unused funds will be rolled over to the next program year for that sub-program. Additionally, if funds become available due to the withdrawal of any projects during a program year and after project selection, those funds may be made available to the next eligible project on the waitlist for that program year. The waitlist from each program year will not carry over to the following program year.

## CURE PERIOD

After project review by the Program Administrator, a cure period, as defined by the Program Administrator in each year's program year calendar, will begin for all sub-programs. The cure period allows Approved Vendors the opportunity to correct deficiencies identified by the Program Administrator, including missing, unclear, or incomplete project information. Although the cure period is intended to address these issues, note that Approved Vendors should check all submissions for accuracy and the Program Administrator may reject a submission or discipline any Approved Vendor suspected of purposefully submitting placeholder or blank documents.

Approved Vendors must sufficiently address any deficiencies prior to the close of this cure period 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 according to the requirements and processes outlined below. The process for a project to be submitted to the Illinois Solar for All Program generally mirrors that for the Adjustable Block Program as described in Section 7.10 of the 2002 Plan. Projects are submitted by Illinois Solar for All Approved Vendors through a similar process as the Adjustable Block Program, but to expedite processing of ILSFA projects there is no minimum batch size.

## 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. Section 9 of this manual provides more detail on the project selection process. Projects selected in this process will have funds allocated and move on to project development if applicable, and Part II project submission. A Part I project application may be withdrawn prior to the day of the final project selection, the deadline for withdrawal is included in each year's program year calendar.

If the project selection process is not triggered for a sub-program as discussed more in Section 9, then a Part I application may be withdrawn up until the batch is sent to the ICC for approval.

## ADJUSTABLE BLOCK PROGRAM AND ILLINOIS SOLAR FOR ALL

While proposed projects may be submitted to both the Adjustable Block Program (ABP) and ILSFA for approval and funding, contracts will be awarded from only one program, not both. And because the potential exists that a single proposed project can be found eligible or approved by both programs



concurrently, a milestone must be identified that indicates acceptance of contracting from one program and ineligibility from the other.

Therefore, ILSFA will find any proposed project that has been approved by the ABP Program Administrator and the resulting REC contract sent to the ICC for approval no longer eligible for ILSFA. Projects submitted to the ABP must be withdrawn prior to this milestone to remain eligible for ILSFA. The same holds true for projects approved in ILSFA; once the REC contract is sent to the ICC for approval the project is no longer eligible for the ABP.

## PROJECT ASSIGNMENT PROCESS

A project that has been waitlisted (see Section 9) or otherwise not yet selected for a REC contract may change Approved Vendors after its Part I application is submitted; the new Approved Vendor must submit documentation such as email correspondence showing that the original Approved Vendor, the project host, and the project owner have consented to have the new Approved Vendor control the ILSFA application and the project's RECs.<sup>24</sup> An Approved Vendor itself may be sold, or the equity ownership of a project may be sold, without the Program Administrator's approval, but the vendor or project details should be updated within the online portal.

A project that has been waitlisted or otherwise not yet selected for a REC contract may change its Approved Vendor ("AV"). This switch of Approved Vendor could be for an individual project that is a subset of a larger batch.

While it is not necessary to seek approval from the Program Administrator in advance of this transaction, the Approved Vendor transferring the project and the Approved Vendor receiving the project ("Transferee") must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ILSFA application. The documentation also must show that the project host and the project owner, if different, consent to the change of Approved Vendor.

Please note that if a project was submitted as co-located with another project, it will continue to be deemed co-located after any change of Approved Vendor. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being received by the Transferee AV. The co-located pricing provision will only be applicable if the ICC's approval of the second project is within one year or less of the ICC's approval of the first project. If the first project has not yet received ICC approval at the time of the second project's approval, then the co-located pricing provision will apply.

## 8.2. Disclosure Forms

The Disclosure Form provides clear and consistent information to customers who are considering an offer under Illinois Solar for All. An Approved Vendor or Designee must submit a completed and properly

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<sup>24</sup> If a community solar project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors.

signed Disclosure Form for each Residential (Small or Large) or Non-Profit and Public Facility project or community solar subscription. There are several different Disclosure Forms for different types of offers. There are currently three separate Disclosure forms for Residential projects (system purchases, leases, and PPAs), one Disclosure Form for Non-profit and Public Facility projects, and one Disclosure Form for Community Solar offers. Approved Vendors must complete and provide these Standard Disclosure Forms to each program participant, and obtain the participant's signature, prior to or contemporaneously with the contract execution with the participant. The ILSFA Residential Standard Disclosure Forms 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 and customer instructions for insuring the system. Savings for both periods are automatically calculated and must meet the minimum savings requirements outlined in Section 5 of this manual.

The following disclosure forms are on the ILSFA website and available to Approved Vendors in the Vendor Portal. Based on the 2022 Plan, Disclosure Forms will be revised after a stakeholder feedback process. New Disclosure Forms, and clear deadlines for their use will be provided to Approved Vendors once they are available.

- [Residential Disclosure Form – System Purchase](#)
- [Residential Disclosure Form – System Lease](#)
- [Residential Disclosure Form – PPA](#)
- [Non-Profit and Public Facilities Disclosure Form](#)
- [Community Solar Subscription Disclosure Form](#)

For on-site projects (including Residential (Small and Large) and Non-Profit and Public Facilities), a completed Disclosure Form is required for submission of a Part I application. For Residential projects, the Disclosure Form must be generated using the disclosure form system within the Approved Vendor portal at [www.IllinoisSFA.com](http://www.IllinoisSFA.com) unless otherwise approved by the Program Administrator. The portal contains an interactive form that can be completed by either the Approved Vendor or one of their approved Designees, and the participant can either e-sign it by using the portal e-signature functionality or print, sign, scan, and upload it. While the Approved Vendor or their subcontractors can facilitate the disclosure form submission process, only the participant can sign the form. The information from the Disclosure Form is automatically transferred to the application portal to start a Part I application for Residential (Small and Large) systems. The information on a Disclosure Form can be updated within the Portal prior to customer signing but cannot be edited after the customer has signed the document (for e-signing) or downloaded the document (for wet signatures), thus finalizing the form. Approved Vendors may not use their own versions of the Disclosure Form (except with prior approval from the Program Administrator as described below) nor are they authorized to edit in any way the Disclosure Form generated in the Portal. Approved Vendors may employ commercially available e-signature systems for customer signature of the disclosure form but must submit the audit/signature information page with the e-signed disclosure form. Note that if the AC size of a system as submitted in Part I differs by more than 5% or 1 kW, whichever is greater, from the AC system size noted in that application's Disclosure Form, a new Disclosure Form will be required.

An Approved Vendor may request the use of an internally generated disclosure form system for Community Solar projects as long as they demonstrate their system to the Program Administrator, showing calculations and output that match the portal-generated Disclosure Form. Bulk uploads of both signed Disclosure Forms generated through the Approved Vendor's system, along with signature audit documents, and portal-generated disclosure forms must be submitted in the portal as an upload to the project. Use of disclosure forms created within an Approved Vendor's system will be limited to subscriptions using a standard offer as described at the time of approval of the internally generated Disclosure Form.

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 prior to signing. Program participants may be presented with the Disclosure Form and installation contract in the same interaction and, following the explanation of the standard disclosure form to the customer, those documents may be executed contemporaneously. Terms of the underlying contract between a customer and an Approved Vendor or its subcontractor must be consistent with terms of the required Disclosure Form. Any statements made verbally must be consistent with the contract and the Disclosure Form. To provide an additional consumer protection safeguard, the customer has a right to cancellation within 14 calendar days of executing the contract.

An Approved Vendor of a contracted Community Solar project will be required to identify all known subscribers, including an anchor tenant, and their subscription shares and submit the subscribers' executed subscription disclosure forms with the Part II application at the time of energization. For any subscription agreement that was executed prior to the publication of the Community Solar Subscription Standard Disclosure Form, the Approved Vendor will have an opportunity at the Part II application to attest, in lieu of submitting a subscriber's executed disclosure, that diligent, good-faith efforts to obtain the signed disclosure were unsuccessful. Customers shall have the right to immediately cancel the subscription agreement within three calendar days after its initial consummation, and to cancel subscriptions at any time with a 30-day notice.

### 8.3. Batches

Approved Vendors will complete applications on a project-by-project basis, but may submit projects in batches in order to streamline the contracting process. Approved Vendors may submit individual projects or batched projects either during the initial submission window or on a rolling basis if project selection is not required and the sub-program is reopened for submissions. As projects are verified, the Program Administrator may place them into new batches that will result in a contract and/or new confirmations with one utility or the IPA. Utilities (or the IPA) may use one master agreement with multiple confirmations (one confirmation per batch) from an Approved Vendor, rather than having multiple contracts with the same vendor. The systems within the batch/confirmation will be listed on a schedule (or product order) attached to the contract and may not be substituted once approved.

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 (although a batch may consist of only one project). The Approved Vendor Managers on the Program Administrator 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 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, after any attempts to cure deficiencies have been made, a project is reviewed and deemed eligible by the Program Administrator, the Program Administrator will forward the batch or individual projects, as applicable, to the Adjustable Block Program Administrator, who will generate the REC contract for all ILSFA projects. The batch and/or individual projects will be assigned to a REC contract with either a utility or the IPA (depending on the source of funds).

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. Based on this review the Program Administrator deems the project either eligible or ineligible. Factors that may make a project ineligible<sup>25</sup>:

- Lack of executed interconnection agreement for projects > 25kW AC
- Incomplete and missing documentation (e.g., unsigned Disclosure Forms, no community engagement plans and missing or non-specific community support letters, no site control documents uploaded, missing site photos, unsupported kWh generation estimate, etc.)
- Non-profit project without eligible/approved critical service provider or project is not located in either an environmental justice community or income-eligible community
- Unresolved documentation inconsistencies
- Use of placeholder documents
- Missed deadlines
- Approved Vendor non-responsiveness

Before submitting project applications, Approved Vendors should ensure the application is complete and accurate.

Project eligibility verification may include review of the following elements.

For all sub-programs:

- Approved Vendor's registration status in the Adjustable Block Program
- System design specifications

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<sup>25</sup> This list is only representative, not exhaustive.

- Project location<sup>26</sup> and property owner
- Name of interconnecting utility
- Project type:
  - Residential (Small)
  - Residential (Large)
  - Community Solar
  - Non-Profit and Public Facilities
- Technical project information:
  - Array information (number of modules, module power rating, tilt, and azimuth) for each array
  - Ground-, roof-mounted or carport (for each array)
  - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking) for each array
  - Inverter information (number of inverters, aggregate inverter size(s) in kW steady-state AC output, which must be equal to or less than nameplate capacity)
  - Inverter efficiency (including transformer loss for designs including transformers on customer side of meter)
  - System size in DC and AC will be calculated by the portal from the information provided above
  - Estimate of first-year energy production
  - Capacity Factor Choice (and Capacity Factor Value, if using Alternate Capacity Factor)
  - Document upload and filename structure:
    - System Design<sup>27</sup> comprised of ALL the following elements:
      - Site plan (Property lines, array and equipment locations, point of interconnection)
      - One Line Diagram
      - Shading Analysis and System Production Report (Helioscope, Aurora, PVsys, etc. Model must show system arrays, obstructions **and** include projected first year kWh production across entire proposed system.)

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<sup>26</sup> The project's latitude and longitude (in degrees out to 6 decimal places, e.g. 41.881856, -87.631222; this information is easily identified through Google Maps) will be requested as *optional* information. Projects in rural locations are strongly encouraged to provide this information. Approved Vendors that submit a significant number of projects with addresses that are difficult to map but no latitude/longitude information may be asked by the Program Administrator to provide latitude/longitude for all future project applications.

<sup>27</sup> System Design encompasses the site plan, one line diagram, shading and production analysis and cut sheet showing UL listing for mounting system. This document should include **all four elements**, with each page titled to reflect its content. It should be collated and reviewed by appropriately qualified personnel who check for consistency and accuracy **before** it is submitted to ILSFA.

- UL listing for mounting system equipment: roof mount, pole mount, bracket, tracking system, etc. (Cut-Sheet or other method of showing UL certification)
  - Filename structure: [Project #]\_System\_Design\_YYYY\_MM\_DD e.g. 0001\_System\_Design\_2019\_06\_13
- Customer Data:
    - Document Upload: Customer Contract (Residential and Non-Profit and Public Facility only)
    - Customer contract term start/end date
    - Income verification for all income-eligible participants (unless customer already received an Income Verification Approval Letter from the Program Administrator), using the directions as follows:
      - For all Methods, use the following file structure to submit Certification and Consent forms: Filename structure: [Project #] Cert and Cons
      - If using Method A or Method C for income verification:
        - Use the following file structure to submit the required documentation: Project#\_Type of Document\_Last Name
        - Remember to redact all personally identifiable information (PII). PII may include the following: ID numbers, such as driver's license numbers, state ID numbers, and passport numbers, date of birth, social security numbers, supplemental security income number, taxpayer identification number, patient identification number and financial account numbers such as bank accounts. Names and addresses, and partial date of birth (MM/YYYY) must be used for verification purposes. Refer to Section 6.1 and/or Section 6.3 for more details about redacting PII.
      - If using Method B: Do not upload the participant's 4506-T. The Program Administrator can view the information in the third-party credit agency portal to verify eligibility.
      - If income verification was completed by the Program Administrator:
        - Use the following file structure to submit the Income Verification Approval letter: [Project #]\_IVLetter\_LastName
    - For the Residential (Small and Large) programs:
      - Income verification (following directions provided above)
      - (If generated through portal:) Customer's e-signed disclosure form (or attestation that the project went under contract or was installed prior to May 10, 2019, when disclosure forms were first made available, and good-faith, diligent efforts to obtain a signed disclosure after that date were unsuccessful)<sup>28</sup>

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<sup>28</sup> For disclosures that are completed using a fillable PDF document, see "Other Required Uploads" for additional requirements.

- Proof of site ownership such as deed (e.g., warranty or quit claim), title, recent mortgage, homeowner’s insurance or property tax statement
    - Host acknowledgement or another site control document
    - Affordability Agreement, if applicable
  - For The Non-Profits and Public Facilities program:
    - Project site location in Income-Eligible Community or EJC
    - (If Generated through portal:) Customer’s e-signed disclosure form (or attestation that the project went under contract or was installed prior to May 10, 2019 and good-faith, diligent efforts to obtain a signed disclosure after that date were unsuccessful)
    - Documentation establishing organization type as non-profit or public agency
    - Proof of site ownership such as deed (e.g., warranty or quit claim), title, recent mortgage, property insurance or property tax statement
    - Host acknowledgement or another site control document
    - Qualifying Tenant Agreement, if applicable
    - Documentation that the organization is a CSP (submitted-with the Part I application) and demonstrated community engagement per program requirements
  - For the Community Solar program:
    - Planned Anchor share
    - Planned Anchor type (non-profit, public facility, other)
    - Document Upload: Letter of Intent from Anchor Tenant
    - Planned share of income-eligible household subscribers
    - Planned non-qualifying share
    - Planned small subscriber share (applies only to income-eligible household share)
    - 100% subscriber-owned status, description, and supporting documentation
    - Proof of site control
    - Document Upload: Community Partnership Description
- Other required uploads:
  - Signed disclosures (wet signatures) if not completed through the application portal
  - Savings Calculator for the relevant sub-program if submitting a disclosure that was not generated through the portal
  - Plot diagram or site map for all systems
  - Photo documentation, as detailed in Section 14.3
  - Signed contracts with MWBE subcontractors for any project intending to request MWBE points as a part of Project Selection.
- For projects larger than 25 kW:
  - Valid interconnection agreement signed by both the interconnecting utility and the interconnecting customer at project submission. Interconnection agreements whose execution dates are older than 16 months should provide supporting documentation

showing that they received an extension.<sup>29</sup> Projects that were forced from the utility interconnection queue due to the utility's queue management process should demonstrate that they exited the interconnection queue involuntarily and have subsequently reapplied for interconnection.

- For ground mounted systems over 250 kW, a land use permit, when applicable, from the Authority Having Jurisdiction (“AHJ”) over the project. In the event a land use permit is not applicable, written confirmation from the AHJ that no permit is required must be provided.
- Requirements for systems already energized prior to Solar for All application:
  - GATS or M-RETS unit ID
  - Document Upload:
    - Ameren Customers: Permission to Operate Packet (PTO) comprised of two approval emails from Ameren Illinois indicating approval to energize and operate
    - ComEd Customers: signed Certificate of Completion including project information
    - Other utilities and coops: signed Certificate of Completion (CoC) and supporting documentation as needed to tie to a Distributed Generation facility
  - Document Upload: Net Metering Application Approval Letter (if applicable)
- For Residential (Small and Large) and Non-Profit and Public Facility projects:
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the installation contract with the customer is consistent with the disclosure form provided to the customer
  - Attestation of compliance with all installation contract requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for contracts executed before May 10, 2019 were unsuccessful)

Project applications are submitted via the online vendor portal, including data entry and document uploads, after which the Program Administrator reviews them. 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.

## PROJECT SELECTION AND ICC APPROVAL

If the sub-program budget is less than 100% subscribed at the end of the initial project submission window, all eligible projects in that sub-program will be sent to the ICC with a recommendation for approval. If the sub-program is more than 100% subscribed, the [Project Selection Protocol](#) will be

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<sup>29</sup> The Program Administrator understands that supply-chain, design, and queue related delays may impact a project's timeline and that installers often receive extensions from the interconnecting utility.



triggered for all eligible projects in that sub-program. Selected projects will then be sent to the ICC with a recommendation for approval. Generally, the ICC meets [twice per month](#).

Projects approved by the ICC will be contracted with a utility or the IPA. After construction, projects move to Part II submission and approval. Projects already installed at Part I approval can move immediately to Part II submission, but will need to create a Part I application to start the process in the Vendor Portal. The Approved Vendor Manager can provide guidance on how to best submit information for already installed systems.

## PROJECT RESUBMISSION

In response to the Program's update of REC incentives, and in an effort to eliminate gaming opportunities, projects that have been approved for ILSFA incentives by the ICC will not be permitted to receive a REC price higher than the price available at the time of its first approval for incentives (i.e., an application cannot be withdrawn and resubmitted in order to receive a higher REC price).

## 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 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, including the factors listed below.

- 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:

- 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
- Provide the name on the PJM-GATS and M-RETS account
- Provide proof of accepted irrevocable transfer agreement
- Financing structure: customer-owned, lease, or PPA (not asked for community solar)
- Document Upload:
  - For Ameren interconnections: Permission To Operate (PTO) packet which includes an approval-to-operate notification email from Ameren Illinois with the signed Certificate of Completion, Installer Certification and Net Metering Application attached, and a second email that includes completed Acceptance and Final Approval and Level 1 DG Interconnection Application or Level 2-4 Interconnection Application.
  - For ComEd interconnections: signed Certificate of Completion which includes project information (location, type, kW capacity, status, etc.)
  - For other utilities and co-ops: signed Certificate of Completion and supporting documentation (e.g., interconnection application) that ties the Certificate of Completion to the DG facility.
- Installer information (must match the name of a current ICC Certified DG Installer and their ICC verified “Qualified Person”)
- Job trainee employment and demographic data (hours, work categories, and qualified program details for all qualified trainees as well as estimated total employee work hours by work category)
- Final system cost including any and all costs related to the following: modules, inverters, other generating equipment, balance of system (BOS), engineering/procurement/construction (EPC), installation, interconnection, origination and development, sales/general/administrative (SG&A) including customer acquisition, financing, legal, permitting/inspection/other soft costs, contingencies, and any other direct or indirect costs attributable to the project. Any and all profit that results from project development should not be included in the total project cost.<sup>30</sup>
- Photo documentation, as detailed in Section 14.3

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<sup>30</sup> Note that with respect to information submitted by Approved Vendors into ILSFA, the IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in ILSFA. 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.

- For projects that included a commitment to utilize MWBE subcontractors as part of the Project Selection Protocol, invoices of payments to MWBE subcontractors as in the project application.
- Proof that the project has initiated an irrevocable standing order without an end date in the REC tracking registry through either a copy of the registry's email acceptance of the irrevocable standing order or a screen shot of the irrevocable standing order screen showing the registry certification number of the system.
- Community Solar projects only:
  - Completed disclosure forms entered in the vendor portal at least 30 calendar days before the planned invoice date for all eligible subscribers, including income-eligible households and the anchor tenant, if applicable
  - Anchor tenant at energization, including subscription sizes and anchor type (non-profit, public facility, other)
  - Income-eligible household subscribers at energization, including subscription sizes
  - Non-qualifying subscribers at energization, including subscription sizes
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the subscription contract with each identified subscriber is consistent with the disclosure form provided to the customer
  - Attestation of compliance with all community solar subscription requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for subscription contracts executed before May 13, 2019 were unsuccessful)
  - All subscriber data from the net-metering utility portal uploaded as an excel or CSV file.

Variations in final system size (in aggregate inverter capacity AC) 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.<sup>31</sup> If the AC 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 REC 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. Conversely, if a project's final size is larger than the planned size, an increase in the REC payment could present unexpected budget management challenges.

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<sup>31</sup> Changes to the DC size of the system are governed by ensuring that the 155% DC/AC ratio is not exceeded; refer to Section 10.12 for the full requirement.

If a project is removed, 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
- Switching between rooftop and ground-mounted
- Switching between tracking system types and non-tracked systems is allowed; however, the lower of the Part I capacity factor or Part II capacity factor must be used. Switching tracking system types by itself is not sufficient to qualify for an exception. At least one additional criterion herein must be met to qualify for an exception

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 that the change would not constitute gaming of the project application or selection process.

## 8.6. Development Timelines and Extensions

Following a project coming under an ILSFA REC contract, if the project is not completed in the time allowed (plus any extensions granted, as described further below), it 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.

The Agency will grant extensions under 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 per kW extension fee for DG 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 per 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 IPA may also, but is not required to, approve additional extensions for demonstration of good cause (i.e., supply chain issues demonstrated to have been caused by covid-19). The IPA 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

Each program year, the Community Solar, Residential (Small and Large), and Non-Profit and Public Facilities sub-programs open project submission windows for Approved Vendors to submit their proposed projects. Submission windows for ILSFA sub-programs may run congruently or separately from one another. Prior to the start of each program year, the Program Administrator will publish a calendar with the submission window timelines for each sub-program. The calendar for the [2022-2023 Program Year submission window timelines](#) is available on ILSFA's website.

After the close of the initial project submission window, the Program Administrator will review project submissions for completeness of documentation and project eligibility. Only project submissions determined to be complete and eligible will proceed to project selection. If the total incentive values of the eligible applications exceed the available funding, then projects submitted during the initial project submission window will be evaluated according to the Project Selection Protocol. If the total incentive values do not exceed the sub-program's available funding and any carveout thresholds are met, all eligible projects submitted during the initial project submission window will be selected. Selected

projects are then sent to the ICC for approval. Project applications for sub-programs with available funding remaining after the close of the initial submission window will be reviewed on a first-come, first-served basis. Projects may still be submitted after the initial project application window closes until the earlier of (i) the end of the program year, or (ii) when the Program Administrator announces that all sub-program funds have been allocated for that program year. This process will be described in more detail below.

For each program year, 25% of each sub-program budget will be reserved for EJC projects and energy sovereignty projects respectively, although these 25% carveouts will not be earmarked for either RERF or utility funding.

The document linked immediately below outlines the draft Project Selection Protocol for Stakeholder Comment for the 2022-2023 program year. The document will be finalized and published prior to the 2022-2023 project submission window openings. The Project Selection Protocol describes how projects will be selected for ILSFA REC contracts in the event that project applications received during the project submission window for a given sub-program exceed that sub-program's available annual funding.

- [Project Selection Protocol](#)

#### USE OF PROJECT SELECTION PROTOCOL

The Project Selection Protocol is triggered when the total incentive value of a sub-program's eligible projects is greater than the amount of funding available for that sub-program. In the case of Residential sub-programs, the Project Selection Protocol is triggered based on the incentive values of projects in two sub-categories: 1-4 unit projects and 5+ unit projects.

#### WAITLIST PROCESS

Should unselected eligible projects remain following the completion of the Project Selection Protocol, they will be put on a ranked waitlist. Any project waitlist in a sub-program (including a waitlist created under the "First Come, First Serve" process described further below) will be treated as follows:

- Within a sub-program, if a project previously selected for that program year later withdraws from ILSFA during the same program year, the newly available budgetary capacity will be used to select the highest-ranked unselected projects on the waitlist, if any. If the withdrawn project causes the remaining selected EJC projects, in aggregate, to dip below 25% of sub-program budget, the highest-ranked EJC projects will receive a preference with the goal of reaching 25%. The same prioritization will apply if the withdrawn project causes the value of the remaining energy sovereignty projects to fall below 25% of the sub-program budget.
- Note that Approved Vendors given a resizing decision have 15 business days to notify the Program Administrator of whether they will accept or refuse the resizing offer. The Program Administrator presents resizing decisions to the Approved Vendor when the amount of funding that remains available for the program year in a given sub-program is less than the next waitlisted project's submitted REC incentive value.
- Eligible but unselected projects from the previous program year may re-apply for the next program year; however, those projects are given no additional consideration in the next program year for having been on the waitlist. In this case, the same previously submitted project

information and documentation can be used within the online Approved Vendor portal unless otherwise noted. The Approved Vendor will be required to certify that the project information and documentation remains valid.

## FIRST-COME, FIRST-SERVED PROCESS

If a sub-program has available funding following its initial project application window, a rolling project submission window will open on a first-come, first-served basis. This could happen due to the following circumstances:

1. The total incentive value from the sub-program's initial eligible project submissions is lower than the sub-program's available funding
2. If the 25% reserved portions of the sub-program budget are not filled with EJC and energy sovereignty projects through the Project Selection Protocol, or
3. Previously selected projects withdraw and the waitlist is emptied.

The first-come, first-served application process will apply through the last day of the program year or until the remaining portion of the sub-program budget is allocated.

Projects will be considered throughout the program year in order of their Part I batch submission date. A waitlist will be created upon the exhaustion of the 50% non-EJC and non-energy sovereignty portions of the sub-program budget or 100% of the total sub-program budget (whichever comes first); projects may then still apply until the last day of the program year to be placed in order on the program year's waitlist. Once again, this waitlist is only used in the case of withdrawal of a previously selected project; the waitlist will not be used for subsequent program years. Once the 50% non-EJC and non-energy sovereignty portion of the sub-program is exhausted, only EJC and/or energy sovereignty projects will be considered.

In general, projects will be allocated first to the utility budget within a sub-program. When a project's selection would exceed the remaining utility annual budget within a sub-program, it will be instead allocated to the annual RERF budget if possible.<sup>32</sup> If neither of those options is possible for a selected project due to constraints in the remaining RERF and utility budgets within the sub-program, the project will be granted the option to resize in the same manner as described in the Project Selection Protocol in order to fit within remaining unused RERF or utility budgets for the sub-program. A project that declines

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<sup>32</sup> The Agency reserves its right to shift the use of the utility funding as needed among sub-programs, as contemplated in Section 8.4.3 of the 2022 Plan, As this allocation of utility funding to the sub-programs is not required by law after the initial allocation, the Agency may adjust utility funding between those sub-programs on an as-needed basis after the 2022-2023 program year if there are available funds in one sub-program and higher demand in another sub-program, with the exception that funds for the Distributed Generation sub-program will not be reallocated.

to resize will be placed on the sub-program's waitlist for that program year,<sup>33</sup> and the next project will be considered. A carveout of 25% of each sub-program budget will be maintained for both energy sovereignty projects and projects in EJs through the close of the program year, allowing for a reduction in the energy sovereignty carveout reflective of any projects that qualify for both energy sovereignty and as located in an EJC. Any unused budget capacity in the energy sovereignty or EJC carveout, as well as any unused RERF or utility budget within the sub-program remaining at the end of the program year will be rolled over to the sub-program budget of the next program year. The waitlist from each program year will not carry over to the following program year.

## 10. System Requirements

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

A complete description of the ILSFA program can be found in the IPA's [2022 Plan](#).

ILSFA 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 or FEJA) and Public Act 102-0662 (known as the Climate and Equitable Jobs Act or CEJA). 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, and partner firms AECOM, and Shelton Solutions.

Photovoltaic (PV) system installations may also be subject to local ordinances, regulations, or codes. The ILSFA 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 ILSFA projects, the PV system installer must have a current [Distributed Generation Installer certification from the ICC](#).

### 10.3. Previously Used Equipment

A project may only use previously used equipment if the Approved Vendor can demonstrate to the Program Administrator: a) that they are providing a warranty equal to that which would be available for the same equipment if it were new and b) that the participant has been informed of, and agrees to, the use of used equipment. The participant must sign an acknowledgement form stating that previously used equipment will be part of their system and uploaded as part of the Part I project submission. This

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<sup>33</sup> The 2022-2023 project waitlist within a sub-program would be eligible for use (including a resizing decision if necessary) for any new sub-program capacity that opens (i) if 2022-2023 project selections withdraw from the program during the 2022-2023 program year (with a priority given to maintaining the 25% EJC carveout in the sub-program), or (ii) if the 25% EJC carveout for the 2022-2023 program year is unfilled by the last day of the program year.



acknowledgement form will be available in the Approved Vendor Portal, and Approved Vendors are responsible for collecting it from participants.

## 10.4. System Location

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

ILSFA PV system designs should minimize shading and placement of modules and arrays in low yield locations to the greatest extent possible.

## 10.5. Interconnection Date

All PV 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 ILSFA program, certain conditions are required to meet program requirements related to consumer protections and customer contracts. Please review those documents/sections for details on satisfying those requirements.

## 10.6. Installer Requirements

While ILSFA does not require using a Qualified Person for installation, the ICC requirements for using a Qualified Person for on-site distributed generation projects still apply. On-site distributed generation projects must therefore be installed by a company with a current [Distributed Generation Installer certification](#) from the ICC.

As such, only the following may perform installation of a Residential (Small or Large) or Non-Profit Public Facility system:

- 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 DG 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 Board-approved 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 DG technology for which the qualification status is sought.

## 10.7. Expansions

An expansion of an energized system that is already under an ILSFA 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 or product order independent from that of the original system. The expansion must comply with all program rules in effect at the time the expansion application is submitted.

An expansion is defined as (i) additional distributed generation capacity at the same parcel if (a) serving the same customer, or (b) serving an affiliated customer, or (c) commonly owned, with respect to an existing contracted Residential or Non-Profit or Public Facility; or (ii) additional community solar capacity on the same or adjacent parcel and under common or affiliated ownership with respect to an existing contracted Community Solar project.

Expansions are subject to the following additional requirements:

1. The expansion will only be compensated up to the maximum 5 MW size limit when added to the original system at that location. For example, if a location already has a 4.9 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 ILSFA 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.

## 10.8. Co-location

### CO-LOCATION OF RESIDENTIAL (SMALL OR LARGE) PROJECTS

Co-location of Residential (Small or Large) occurs when multiple projects approved in the same program – ILSFA or Illinois Shines, not both - are located adjacent to each other, perhaps using the same point of interconnection. The total capacity of Residential systems enrolled in the ILSFA 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 or ground locations on the same parcel will be considered a single system (for purposes of measuring size in kW<sup>34</sup>) 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, for example Business articles of incorporation if applicable, that the occupants are not affiliated entities and each has a separate utility meter and separate utility billing.

#### CO-LOCATION OF NON-PROFIT AND PUBLIC FACILITIES PROJECTS

NP/PF projects that are co-located shall follow the same requirements as the co-location of Residential (Small or Large) projects, described above.

#### CO-LOCATION OF COMMUNITY SOLAR PROJECTS

1. No Approved Vendor may apply to ILSFA for more than 5 MW of community solar projects on the same or contiguous parcels (with each parcel of land defined by the County where the parcel is located).
2. Multiple projects up to 5 MW in aggregate on the same parcel with the same owner will be considered a single project for the purposes of REC pricing.
3. 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.
4. 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 5MW.
  - 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.
  - d. Additionally, parcels that are separated by a public road, railroad, or other right of way accessible at all times to the general public are not considered contiguous.

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<sup>34</sup> Although multiple 1-4 unit buildings in this scenario will likely still receive 1-4 unit pricing, Approved Vendors should discuss specific scenarios with their assigned Vendor Manager

5. Projects owned or developed by separate entities (meaning 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.
6. Projects must have separate interconnection points.
7. REC pricing is tiered according to system size and co-located system size is aggregated to a maximum system size of 5MW. Where an initial project smaller than 2MW in capacity has been contracted at the non-co-located system REC price, the REC price applicable to subsequent systems (up to 5MW total) will be adjusted downward to create contract value across the two co-located systems that reflects the aggregate system capacity exceeding 2MW.

#### ASSIGNMENT OF CO-LOCATED PROJECTS

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendor. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if community solar, could, if applicable, be newly considered co-located after being received by the Transferee AV.

#### REC ALLOCATION OF CO-LOCATED PROJECTS

If a single project is developed and then a second, co-located project is developed on the same or a contiguous parcel at a later date, these two projects will be considered co-located and co-located project prices will apply. To make this price adjustment the least administratively burdensome on all parties involved, the price adjustment for both projects will only be applied to the second project, with that project's REC price reflecting not only the co-located project price, but also an additional discount reflecting the differential between the first project's contract price and the applicable co-located project price. This co-located pricing provision will only apply if the Commission's approval date of the second project is within one year or less of the Commission's approval date of the first project. If the first project has not yet commenced construction at the time of the second project's approval, then the co-located pricing provision will apply. If there are two co-located projects on a single parcel (or two contiguous parcels) owned by a single entity or represented by a single Approved Vendor, any sale of one project to a different owner or transfer of one project to a different Approved Vendor would not avoid the price adjustment that applies to co-located projects. In such a case, the second project's REC price would be adjusted to a price accounting for both co-located projects (i.e., below the listed co-located project price) in line with the description above. This restriction also applies to projects that are accepted off the waitlist that would render an already developed project a co-located project.

## 10.9. Site Control

For project application, 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.

## 10.10. 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).

## 10.11. 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 [PVWatts](#) estimated production<sup>35</sup>, 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

## 10.12. REC Quantity Calculation

The application portal will automatically calculate the PVWatts estimated production. The use of a standard capacity factor is no longer allowed as a method of production estimation used for applications

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<sup>35</sup> PVWatts is a tool developed by the National Renewable Energy Laboratory to estimate the energy production of photovoltaic (PV) systems.

in the ILSFA portal.<sup>36</sup> Approved Vendors may either use a capacity factor calculated in the portal using PVWatts or propose an alternative capacity factor. An applicant will be allowed to choose either of these numbers, rounded down to the nearest REC for the 15-year contract REC delivery amount. Project applications submitted prior to Program Year 4 that utilized a standard capacity factor are not impacted. The portal will automatically calculate the PVWatts capacity factor using PVWatts Version 6 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
- 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)

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 PVWatts estimate and must use an alternative capacity factor.

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. Any capacity factor that

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<sup>36</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.

results in a REC quantity calculation that differs by more than +/-20% from the PV Watts REC quantity calculation requires the Approved Vendor to confirm that the entered capacity factor is intentional.

The Program Administrator will evaluate systems using non-standard technologies such as bifacial panels or seasonally adjusted tilt on a case-by-case basis.

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 as-built 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.

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 (prior to the onset of Program Year 4) 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 PVWatts calculates a higher capacity factor for Part II relative to Part I, the lower capacity factor from Part I will be used. If a custom capacity factor was used at the Part I application stage, the same custom capacity factor (or lower custom capacity factor, if reduced per above) will be used and applied to the Part II system size. Switching among production estimate calculation methodologies between Part I and Part II is permitted only if accompanied by a decrease in the capacity factor. Subject to all of the above, the lower of (i) the product of the Part I capacity factor and the Part I project size and (ii) the product of the Part II capacity factor and the Part II project size will be used to establish a number of RECs for contractual payment and delivery obligation.

Modifications to Part I project parameters may be permitted prior to the Program Administrator's approval of the Part I application, but only if these modifications do not increase the 15-year REC quantity.

All projects must submit a PDF output of the system design, including the shading study.

## 10.13. System Size

All system sizes described in this manual are AC system size based on the aggregate 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.

Systems will be limited to a DC capacity of 155% 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.

## 10.14. 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 three 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.
3. The inverters' software setting is configured to prevent the battery<sup>37</sup> from charging via line power. This software setting may not be changed for the duration of the project's participation in ILSFA.

## 10.15. 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 2022 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 aggregate 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).

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<sup>37</sup> For systems that include a battery, a detailed schematic must be provided showing that either only solar-generated power can be used to charge the battery, that the battery's output does not run through the meter used to measure solar output, or that a password-protected software setting is enabled for the duration of the project's participation in ILSFA that prevents the battery from charging via line power.



## 10.16. Metering

1. Systems registered in M-RETS must utilize an ANSI C.12 certified revenue quality meter.
2. 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.

**TABLE 10.1. METERING REQUIREMENTS**

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)

## 10.17. 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 income-eligible households or the single anchor tenant 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<sup>38</sup> 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. Each approved batch will be wholly funded by one or the other source, with utility funding prioritized until an annual utility budget is exhausted. Projects funded by utility-held funds require contracting for REC purchases between an Illinois electric utility and the Approved Vendor. RERF-funded projects require contracting for REC purchases between the Agency 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” is between the Approved Vendor and the utility counterparty or the Agency. The REC contract is executed once between counterparties and establishes the agreed framework for contracting and delivering RECs across multiple contracts and projects. There are currently two sets of contracts: one set used for projects approved in Program Years 1-3 and one set for projects approved in Program Year 4. A third set of contracts will be released prior to the start of Program Year 5 which will capture necessary updates to reflect changes in the 2022 Plan.
- The REC contract is the agreement representing a batch or batches (each batch memorialized through a Product Order) of projects contracted for delivery between counterparties.
- 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 Standard REC Contracts](#) (i.e., the standard contract between an Approved Vendor and the Agency, and the standard contract between an Approved Vendor and an electric utility). Additionally, if an Approved Vendor is assigning their entire REC contract or any product orders/batches in their entirety to another Approved Vendor, the

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<sup>38</sup> While submitting projects in batches is no longer required, Approved Vendors may submit projects in a batch for ease of contracting or if batching projects is preferable for the Approved Vendor.

[Acknowledgement of Assignment](#) and [Acknowledgement of Assignment and Consent](#) must be signed by the Assignor, the Assignee, and the Buyer. More information about this can be found in the [Assignment FAQ](#).

## ILLINOIS COMMERCE COMMISSION APPROVAL

The ICC meets approximately every two weeks. Both Program Administrators 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 for its open meeting agenda at least eight business days prior to each meeting. For an Approved Vendor's first batch or batches with a given counterparty (either a utility or the Agency), the batch(es) will constitute a new REC contract. Subsequent batches will be included in separate Product Orders under the existing REC contract.

When the Program Administrator submits contract (or Product Order) information to the ICC for approval, that submittal will include the Agency's and Program Administrator's recommendation for approval of the batch, with a summary of factors relevant to 2022 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 (or Product Order). The Approved Vendor must then sign the REC contract (or Product Order) as approved by the ICC within seven business days of receiving it.

## FAILURE TO EXECUTE THE CONTRACT

Approved Vendors that do not execute an ILSFA REC contract (or Product Order) after project selection, submission to the ICC for approval, the ICC'S approval, and contract execution by the Buyer (the applicable utility or the Agency) may face disciplinary measures. Any discipline will be based on the Program Administrator's and IPA's review of the circumstances under which the contract (or Product Order) was declined.

Discipline may include a possible suspension or termination of the Approved Vendor's status under ILSFA. Suspension or termination will not impact an Approved Vendor's rights or obligations under already-executed contracts or product orders, but rather it will impact the Approved Vendor's ability to submit new project applications. Generally, the Program Administrator and the IPA will review all of the circumstances informing why a contract award was declined before the issuance of any discipline. Approved Vendors should provide a detailed, comprehensive explanation for why they declined to execute any contract or product order. If circumstances genuinely outside of an Approved Vendor's control necessitated non-execution, then discipline may have limited deterrent effect and may not be warranted. Neither the IPA nor the Program Administrator is able to provide a disciplinary determination in advance of non-execution to "pre-approve" such an action, nor can they provide a timeframe for the issuance of such determination after non-execution.

## COLLATERAL

Following ICC 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, as follows:

- For Residential Solar (Small or Large) or Non-Profit and Public Facility projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application,

or if already energized, based on the final capacity factor and the system size as built (if smaller than the proposed size).

- For Community Solar projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application, including a proposed REC price that uses solely the applicable ILSFA community solar REC price, plus the highest small subscriber adder. If already energized, this is based on: (i) the final capacity factor and system size as built (if smaller than the proposed size), (ii) the anchor and non-anchor tenants shares, and (iii) the applicable anchor share REC price and ILSFA (non-anchor) REC price including the applicable small subscriber adder.

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 contract counterparty.

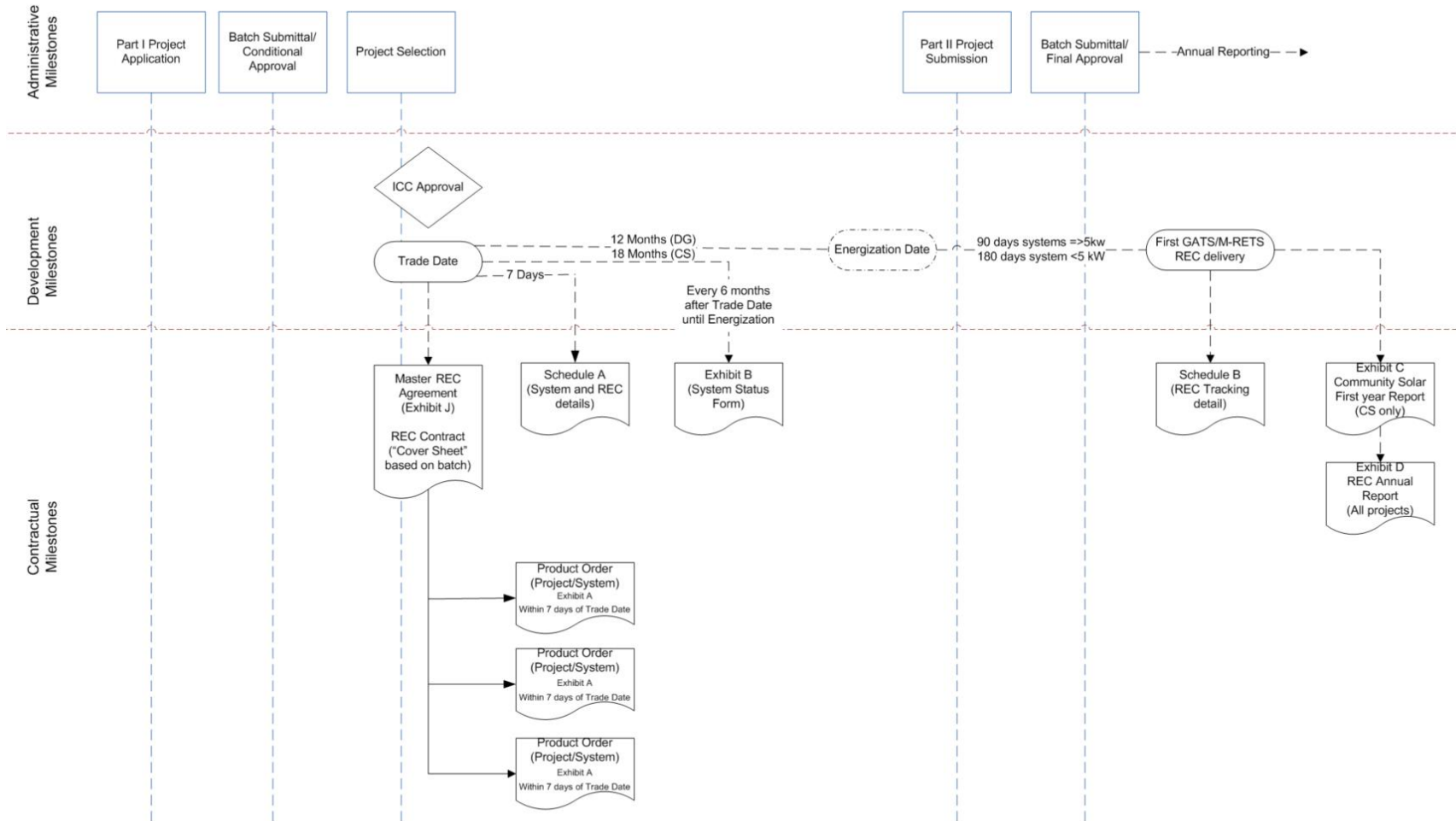
## 11.2. REC Delivery

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. For Community Solar projects, Approved Vendors should establish the standing order once their subscription levels have been confirmed with their Approved Vendor Manager. The subscription levels should be entered as the certification % when the standing order is created. Standing orders must be established without an end date. The applicable buyer (utility or Agency) of the RECs will cancel the order at the end of the REC delivery term. When registering a system in PJM-GATS or M-RETS, the Approved Vendor must incorporate the ILSFA application ID into the name of the system, the Unit field, and the Note field. Where the IPA is the counterparty for a project's REC contract, and not ComEd or Ameren, Approved Vendors should use IPA's GATS account "Illinois Solar for All – IPA" as the recipient for the irrevocable standing order. Do not establish the standing order for the "IPA Transitional Account." Approved Vendors using M-RETS for REC delivery on projects where IPA is the counterparty should establish the irrevocable standing order with the account "IPA."

**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.



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## 11.3. Community Solar REC Value Calculation

- 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 the time of Part II submission and confirmed with an Approved Vendor Manager. 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 Community Solar projects:
  - Anchor tenants
    - A single Anchor Tenant that is a non-profit organization or public entity
    - A single Anchor Tenant that is not a non-profit organization or public entity
  - Qualified income-eligible household subscribers. Based on their subscription contract, Income-eligible household subscribers may also be determined to be energy sovereignty subscribers. The percentage or share of energy sovereignty subscribers needed for a project to be categorized as an energy sovereignty project for the purpose of the Project Selection Protocol is one of the questions proposed to stakeholders for comments by the Program Administrator. Updates will be made to the Vendor Manual in response to those comments and published prior to the Program Year 5 submission windows opening.
  - Non-qualified subscribers (all other subscribers)
- A single anchor tenant that is not an income-eligible household (as defined below) will be allowed. The anchor tenant's share will receive the applicable Adjustable Block Program Community Based Community Solar REC price. The anchor tenant must be identified at the time of the Part I application. Note, in the first two program years, non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar price.
- Other than the anchor tenant, all subscribers must be income-eligible 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 tenant's share, must be allocated to income-eligible subscribers by one year after the time of energization (e.g., if the anchor tenant's share is 30% of the project capacity, then at least 35% of total energy produced must be subscribed by qualified income-eligible 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 income-eligible households (outside the single anchor tenant) will not be included in the contract, will receive no ILSFA payments for their RECs, and will not be required to deliver RECs to the utility or Agency.
- All subscribers to a Community Solar project (including non-anchor, non-income-eligible residential subscribers) must receive and execute an Illinois Solar for All Community Solar Standard Disclosure Form.
- Subscription levels at energization will additionally be verified by the Program Administrator based on review of the net-metering list for all subscribers provided by the Approved Vendor from the utility net-metering portal.

- Approved Vendors shall update the percentage of the respective recipient types for the Community Solar project at the end of the first year to establish the final contractual value. Approved Vendors shall subsequently submit Annual Reports 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 Section 12 (Annual Reporting) of this manual for more detail.
- Projects within the Community Solar sub-program can qualify for the energy sovereignty selection prioritization points either through an ownership or cooperative model for subscribers. The ownership model includes a lease or PPA with a buyout clause triggered at seven years or earlier after energization to give the customer ownership of the panels to which they have been allocated on the Community Solar project. The cooperative model allows a co-op organization to sell subscriptions to customers/owners of the co-op, with the customer receiving a low-cost subscription and any financial benefits of ownership.

## 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 created before 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 data 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 before the Annual Report submission date. Detailed information about creating RECs in the PJM-GATS system can be found at <https://www.pjm-eis.com/>. Detailed information for M-RETS can be found at <https://help.mrets.org>.

## 11.6. Assignment of REC Contracts

REC contracts entered into under the ILSFA 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 2022 Plan, assignments may only be made to entities registered with the ILSFA program as Approved Vendors. If the assignment is to an Approved Vendor with 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 assignee 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 of a product order may not be made within the later of a) 30 business days after the ICC approval date of the product order or (b) the posting date of collateral for the product order. 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. The Agency reserves the right to publish a standard acknowledgement form for assignments of the REC contract. 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.

A detailed set of steps for initiating assignment of a product order(s) or a whole REC contract may be found [here](#).

## 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 of a batch (Product Order) or an entire REC contract 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 more information on assignment or collateral assignment, please see the relevant section on Assignments within the applicable REC contract.



# 12. Annual Reports and System Performance Evaluation

## 12.1. REC Delivery Performance Annual Report

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>39</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 [elevateenergy.force.com/ApprovedVendor/s/login/](https://elevateenergy.force.com/ApprovedVendor/s/login/). Approved Vendors should ensure that generation data is entered and RECs have been delivered to the Buyer accounts within the applicable tracking registry (PJM-GATS or M-RETS) prior to the end of the reported Delivery Year, i.e., May 31<sup>st</sup>.

The Annual Report will serve as the basis for verifying that the RECs from projects are being delivered to the applicable counterparty. Absent corrective actions taken by the Approved Vendor, the Annual Report serves as a tool to determine what actions may be taken by the utilities or 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 Annual 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 and/or installation deficiencies

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

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<sup>39</sup> An Approved Vendor may request for a system's annual REC delivery obligations to be reduced in mid-contract. 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. Reporting for Community Solar Projects

### ANNUAL REPORTING FOR COMMUNITY SOLAR PROJECTS

The following are items that must be included in the Community Solar Annual Report:

- Percentage of each system subscribed on a capacity basis
- The number and type of subscribers (e.g., income-eligible households, anchor type, non-qualifying subscribers, energy sovereignty subscribers), including capacity allocated to each type
- Income verification information for all new income-eligible household subscribers
- Subscriber turnover rates

The Community Solar Annual Report will require the Approved Vendor to enter each verified subscriber with a signed Disclosure Form, subscriber type, the subscriber's contract start date and end date (if it fell within the current reporting year), whether the subscriber meets the small subscriber requirements and the subscriber's subscription size in kW, if applicable based on whether small subscriber adders were available when the project was contracted. The portal will automatically prorate all data to determine the average subscription amount and percentage of small subscribers based on this data. Subscriber details and disclosures should be submitted to the portal no later than 30 days prior to the end of the delivery year. This is to provide time for review and for any corrections that need to be made prior to the end of the delivery year. Small subscriber share (as applicable) is determined by the aggregate share of income-eligible 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 and/or the Agency 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 ILSFA program and, if there are underperformances, coordinate with the applicable utility draw on collateral. That process is described below.

### ESTABLISHING AND REPORTING SUBSCRIBER SHARES

The community solar project shares as submitted at the time of Part II submission will establish the basis for the project's approval at Part II of the project application. At energization, the anchor tenant must be confirmed, including their share in kW and whether they qualify as a non-profit organization or a public entity. In addition, by one year after energization, the share of qualified income-eligible households must be at least 50% of the non-anchor share. The collective share of anchor tenant and income-eligible 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 tenant and income-eligible subscribers established

upon energization and further adjusted one year later will be the benchmark for Annual Reporting and potential collateral drawdowns under the REC contract. Subscriber types will each receive different consideration for REC payments, with:

1. The Anchor Tenant receiving the applicable Adjustable Block Program REC value; note, in the first two program years non-profit and public sector anchors could receive the ILSFA Community Solar REC value.
2. Qualified income-eligible households receiving the applicable ILSFA REC value, and all other subscribers not included in the REC contract and not receiving the REC value.
3. The percentage of small subscribers, if applicable based on the year in which the REC contract was signed (correlates only to income-eligible household shares as a share of the total physical project size).
4. The percentage of energy sovereignty subscribers.

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 contract 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 income-eligible 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 income-eligible subscribers increases to a level that qualifies for a higher small subscriber price adder, then all income-eligible subscriber shares now can sell their RECs at the ILSFA price plus the applicable small subscriber adder. (Applicable only for projects approved in Program Years when there was a small subscriber price 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 to by income-eligible 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.
6. All energy sovereignty subscribers to a community solar project indicating ownership shares in a community solar cooperative or ownership of individual panels located in a community solar project.

See the relevant [ILSFA REC](#) contract 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 (applicable only for projects approved in Program Years when there was a small subscriber price adder), 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 income-eligible 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 tenant share and income-eligible 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 tenant was lost during the delivery year, to bring subscriber shares back in line with contract requirements (namely, income-eligible 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 tenant and income-eligible 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.

### 12.3. Collateral and Performance Evaluation

Five percent collateral (as a percent of REC 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 project batches and systems for a given Approved Vendor. Under-performance by any system in either REC deliveries or community solar subscriptions can trigger a collateral drawdown for a delivery year based on the difference between the allocated REC payment paid for that delivery year and the allocated payment amount that the system was entitled to for that 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 choose which form of collateral shall be drawn upon.

Within 90 days of any collateral draw, the Approved Vendor will be required to post additional collateral to top up its total collateral, so that it equals five percent of its 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 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), then within 14 days of having received that estimate, 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.

## 12.4. Underperformance and Surplus RECs

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

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>40</sup> which is a single surplus REC account for all projects under the REC contract. Surplus RECs can be banked forward indefinitely, if unused, until the end of the final delivery term in the REC contract.<sup>41</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>42</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

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<sup>40</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 (the utility or Agency) when generated and then retired.

<sup>41</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>42</sup> This refund procedure would not apply to prior collateral drawdowns based on annual community solar subscription rates.

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.

## 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 and for which the Program Administrator has approved the Part II project application. For all ILSFA 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 (as discussed in Section 11.1), 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:

### Residential (Small and Large) 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 will be used. 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.

### Community Solar Systems

- 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 then applicable to the

actual nameplate capacity under the ABP Community Driven Community Solar REC price table at the time of energization; note, this represents a change from the first two program years, when non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar REC price. 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 (i) the proposed nameplate capacity multiplied by the proposed capacity factor, and (ii) the actual nameplate capacity multiplied by the Part II capacity factor. The quantity of RECs will also be based on the percent of the actual nameplate capacity that is being subscribed by the anchor tenant and income-eligible subscribers combined at the time of energization; the subscription shares will be re-evaluated, with the quantity of RECs to be paid for and obligated then fixed for the life of the contract, at the end of the fourth full quarter after energization.

Invoices for payment may be submitted to the IPA or counterparty utility on a quarterly or monthly basis as described in the REC contract for the project being invoiced. To facilitate invoicing and payment, at the end of each month, the Program Administrator will prepare a 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 for projects that were verified as energized during the recently completed invoicing month or period.<sup>43</sup> The IPA, through its Program Administrator, expects to issue quarterly netting statements by the following dates: June 1, September 1, December 1, March 1 for PY1 - PY3 projects and the first of each month for projects in PY4 and beyond.

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 for projects with PY1 – PY3 REC contracts and for PY4 and beyond the tenth (10th) day of the month immediately succeeding Energization or the month immediately succeeding the conclusion of the Approved Vendor's Quarterly Payment Cycle. The Program Administrator will work with the Approved Vendor to ensure that the target invoicing date is feasible, and projects are deemed eligible for invoicing at Part II. The Approved Vendor, should submit Part II applications no later than 30 days prior to the desired invoice date and should coordinate with its Vendor Manager to ensure the Part II review process provides ample time to allow for project review and corrections as needed.

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<sup>43</sup> A community solar project will also have a one-time payment adjustment at the end of the fourth full quarterly period after energization.

Where a utility is the contractual counterparty, payments from the counterparty to the Approved Vendor will be made (for the Approved Vendor's first contractual payment under a contract) at the end of the month immediately following the month in which an invoice is submitted, or (for subsequent payments under a contract) at the end of the month in which an invoice is submitted, provided that the counterparty receives the invoice by the relevant due date.

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

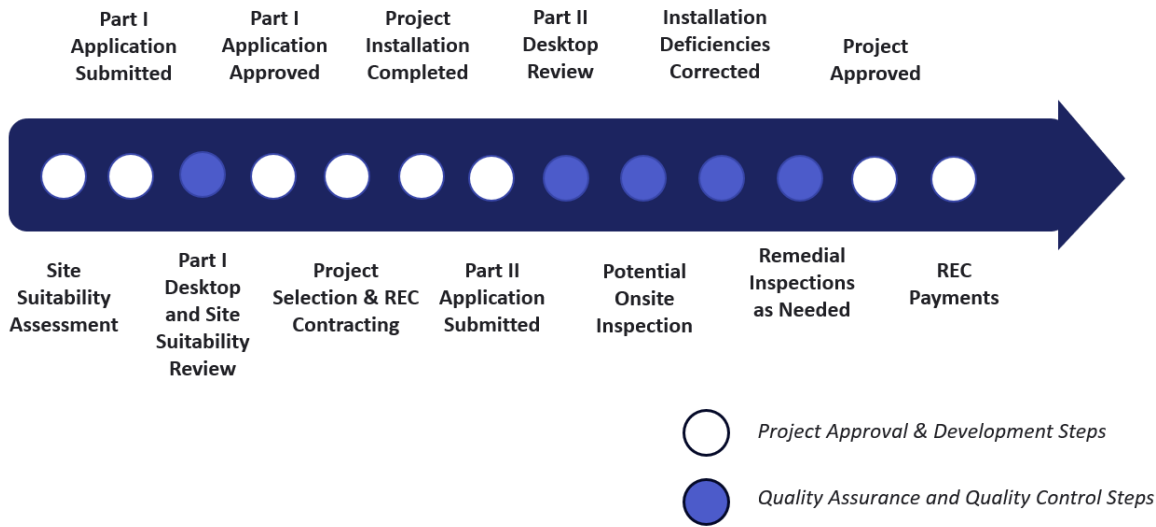
The ILSFA Program Administrator has developed and implemented a process for quality assurance of project systems,<sup>44</sup> including system design review, photo documentation, and onsite inspections of a subset of installations. If installations have deficiencies, the ILSFA Approved Vendor will be 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 participate in the ILSFA program.

The following diagram illustrates how the quality assurance milestones fit into the overall project development timeline:

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<sup>44</sup> The Program Administrator will inspect installations, looking at electrical and structural aspects of the installation and final approvals will be made by the Authority Having Jurisdiction and interconnecting utility.





The Program Administrator reviews photographs submitted with the Part I project application along with the Site Suitability Report to validate the site suitability findings and compliance with the Site Suitability Guidelines. Part II photo review validates the installed system, equipment, compliance with program and local code requirements, and general quality of workmanship. Onsite live inspections validate site suitability and provide an opportunity for detailed inspection of system quality, safety, and performance. 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. Submitted projects that do not meet these requirements and do not provide 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, they may submit a written appeal to the Program Administrator and the IPA.

## 14.2. Site Suitability

The Site Suitability Guidelines, linked below, identify site conditions that are considered barriers to the installation of both rooftop distributed generation and ground-mounted PV systems participating in the ILSFA program. These guidelines also prescribe minimum siting requirements that must be met at Part I project approval. Properties where roofing, electrical, structural, or other issues exist can create or exacerbate maintenance and repair issues, create unexpected costs, and impact system performance, potentially placing 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 common in income-eligible communities, where housing stock may be older and deferred maintenance

issues more acute. Ground-mounted siting requirements represent industry best practices in most jurisdictions across Illinois and do not require engineering stamps prior to Part I approval.

The Site Suitability Guidelines document below describes these requirements in full and must be completed with each site assessment.

- [Site Suitability Guidelines](#)

As described in the Site Suitability Guidelines, mitigation plans are developed between the Approved Vendor and site owner to correct problems and remove the barriers to solar installation. The Program Administrator maintains a Program Resources Guide 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 is required for all ILSFA projects and 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. The assessment of photo documentation is Pass/Fail.
- All required photos must be submitted, clearly showing the requested site and installation aspects or components.
- Blurry or incomplete photos will need to be resubmitted.
- Any failure identified during review of photo documentation may trigger an onsite live inspection. Certain failures, such as missing safety labels, may be resolved through resubmission of photo documentation.

Please refer to the Approved Vendor Photo Guide for representative photo examples. Photos that capture the appropriate views and equipment legibly and are clearly labeled help expedite the review process. Part I and Part II project applications require photos as follows:

## PHOTO DOCUMENTATION FOR PART I PROJECT APPLICATION

SITE SUITABILITY	SHADING
<ul style="list-style-type: none"> <li>✓ Photos showing the overall roof condition</li> <li>✓ Photos of the roof components</li> <li>✓ Photos showing the condition of the electrical panel</li> <li>✓ Photos showing work areas are clear of hazardous materials</li> <li>✓ Photos showing conditions of ground mount site (ground mount only)</li> </ul>	<ul style="list-style-type: none"> <li>✓ Photos showing proposed array location</li> <li>✓ Photos showing potential obstructions</li> </ul>

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 <sup>45</sup>	OTHER ELECTRONICS <sup>46</sup>
<ul style="list-style-type: none"> <li>✓ Inverter Information (1 Photo for each model, must show model number)</li> <li>✓ DC Disconnect (1 Photo must show wiring within enclosure - either within inverter or isolated)</li> <li>✓ DC Combiner Box (1 Photo, must show wiring within enclosure behind panel)</li> <li>✓ AC Combiner Panel (1 Photo, must show wiring within enclosure behind panel)</li> </ul>	<ul style="list-style-type: none"> <li>✓ Project (Photo(s) showing all installed modules)</li> <li>✓ Module information (1 Photo for each model, must show model number)</li> <li>✓ Revenue Grade Meter (1 Photo of revenue grade meter location and generation reading)</li> <li>✓ Battery Storage (3 Photos, if installed)</li> </ul>

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<sup>45</sup> In the event of utilizing micro inverters or modules with the micro inverter pre-assembled, please capture the inverter photo during installation to avoid a potential revisit of this item during the Part II inspection.

<sup>46</sup> Please capture the photo of the modules model number during installation to avoid a potential revisit of this item during the Part II inspection.

GENERAL ELECTRICAL (ARRAY) <sup>47</sup>
<ul style="list-style-type: none"> <li>✓ Grounding (1 Photo showing panel frame is grounded and bonded)</li> <li>✓ Exposed Wire Management (1 Photo showing proper safety labels and 1 Photo demonstrating proper wiring securing methods)</li> </ul>

INTERCONNECTION
<ul style="list-style-type: none"> <li>✓ Load-Side Connection (1 Photo of wiring connection in breaker panel)</li> <li>✓ Supply Side Connection (1 Photo of wire tap or connection to switchboard)</li> <li>✓ Main Distribution Panel (1 Photo that captures full overview)</li> </ul>

**STRUCTURAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION**

ANGLED ROOF
<ul style="list-style-type: none"> <li>✓ Mounting System Anchoring (1 Photo showing flashing techniques)</li> </ul>

FLAT ROOF
<ul style="list-style-type: none"> <li>✓ Mounting System Anchoring (1 Photo showing flashing techniques, if installed)</li> <li>✓ Tilt angle (1 photo)</li> </ul>

GROUND MOUNT
<ul style="list-style-type: none"> <li>✓ Tilt angle (1 photo)</li> </ul>

GENERAL STRUCTURAL
<ul style="list-style-type: none"> <li>✓ Mounting System Anchoring (1 Photo showing system BEFORE panels placed)</li> </ul>

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

SHADING
<ul style="list-style-type: none"> <li>✓ Array Clear of Obstructions (1 Photo to show array design of clear arrays matches as-built conditions)</li> <li>✓ Obstructed Array Sections (1 Photo to show array design of obstructed arrays matches as-built conditions)</li> </ul>

MITIGATED BARRIERS (IF APPLICABLE)
<ul style="list-style-type: none"> <li>✓ Photos as needed to show completion of mitigation plan</li> </ul>

## 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 1) have successfully passed the

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<sup>47</sup> Please capture a photo of the modules' evidence of grounding/bonding during installation to avoid a potential revisit of this item during the Part II inspection.

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 qualified Program Administrator Field Inspectors that 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 material 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. An Approved Vendor or contractor will have 20 business days (with extensions for good cause) to remedy the issues.

Projects will be selected for live onsite inspections, which will be either virtual or in-person, according to the following schedule (which applies to each Approved Vendor or Designee):

- 100% of community solar installations will be inspected live onsite
- For all other project types:
  - 100% of an Approved Vendor's first five installations will be inspected onsite live
  - 30% of an Approved Vendor's next ten installations will be inspected onsite live
  - 20% of an Approved Vendor's ongoing installations will be inspected onsite live
  - 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 on-site 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:

<b>Inverter Inspection</b>	<b>Electrical Inspection</b>	<b>Angled Roof Inspection</b>
String Inverter	PV Array Configuration	Ballast Mount
DC Disconnect	Grounding	Rail Mount
DC/DC Converters	Wire Management	Rail-Less Mount
PV Source Circuit Combining	Conductors	
Load Side Connection	Over Current Protection Devices	<b>Flat Roof Inspection</b>
Supply Side Connection	Electrical Connections	Ballast Mount
Battery Storage	Signs and Labels	Rail Mount
Rapid Shutdown Equipment	REC Production Metering	Rail-Less Mount
<b>Module Inspection</b>	<b>General Structural Inspection</b>	<b>Ground Mount Inspection</b>
Microinverters and ACMs	Design requirements	Ballast Mount
Load Side Interconnection	Components and equipment	Tracking Mount
Supply Side Interconnection		
Battery Storage		

The [Onsite Inspection Checklist](#) is the form completed by Inspectors for each inspection.

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 a representative is present to accompany the Field Inspector during the inspection. The Program Administrator Field Inspector will then complete the onsite inspection in accordance with the requirements checklist. Selection of a project for an onsite inspection 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 ILSFA program requires that Approved Vendors utilize eligible trainees from qualified job training programs across their portfolio of projects annually.<sup>48</sup> To meet this requirement, eligible trainees will perform work on ILSFA projects at: (1) a prescribed minimum percentage of total hours worked across an Approved Vendor’s projects annually and (2) at a prescribed number of ILSFA projects. Approved Vendors will track the work of these trainees, as well as all employees, subcontractors, Designees, and agents working on their ILSFA projects.

There are two categories of job training requirements for Approved Vendors for all ILSFA sub-programs: 1) portfolio requirements and 2) percentage of annual projects requirements.

### PORTFOLIO REQUIREMENTS

The portfolio requirements prescribe that installations across an Approved Vendor’s entire portfolio of ILSFA projects each year include a minimum percentage of work hours performed by eligible trainees. The portfolio requirements apply to the projects managed by the Approved Vendor’s subsidiary and special purpose entities, such as Single Project Approved Vendors. This minimum percentage is based upon work hours for all employees, subcontractors, installers, and agents of the Approved Vendor, which will be collected by the Program Administrator. The required percentage of eligible trainee work hours increases annually for each of their first three years that the AV participates in ILSFA, as shown in the table below. This timeline for these increasing annual percentage requirements will start with the beginning of construction of the Approved Vendor’s first project contracted under the Program.

**TABLE 15.1. PORTFOLIO REQUIREMENTS**

Approved Vendor Program Year	Cumulative Job Training Requirement
1	10% of all hours are performed by eligible trainees
2	20% of all hours are performed by eligible trainees
3 and beyond	33% of all hours are performed by eligible trainees

PERCENTAGE of Annual PROJECTS REQUIREMENTS in addition to the portfolio requirements, at least 33% of all of the Approved Vendor’s installations annually in each ILSFA sub-program must include at

<sup>48</sup> See Section 15.2 for definitions of eligible job trainees and qualified job training programs.

least one eligible trainee. Approved Vendors will track the work of these eligible trainees as well as the work of all employees working on ILSFA projects including subcontractors, Designees, and agents.<sup>49</sup> No minimum hours per project or cumulative total hours are prescribed for this requirement, only that a requisite percentage of projects utilize at least one eligible trainee. However, Approved Vendors must also fulfill the portfolio requirements described above.

## ILLINOIS COMMERCE COMMISSION REQUIREMENTS

ILSFA Community Solar projects and Non-Profit and Public Facility projects are exempted from the ICC requirement of using a Qualified Person for every portion of an installation, but the requirement does still apply for Residential (Small and Large) projects.<sup>50</sup> This rule requires that every installation of a DG facility be performed only by: a Qualified Person; an electrical contractor who is not a Qualified Person, provided they are 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 they are directly supervised by a Qualified Person. The definitions of Qualified Person are further clarified in Section 15.2.

## 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 and/or their subcontractors/installers/agents must pay eligible 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's and/or their subcontractor's/installer's/agent's insurance must cover the employment of the eligible training hires, including temporary hires.
- The Approved Vendor and/or their subcontractors/installers/agents must track the work hours of eligible-trainees and any other employee performing work on each ILSFA project.
  - The Approved Vendor must submit the following completed affidavits to the Program Administrator for each project upon Part II project approval submission. The Job Trainee Affidavit identifies the names of the qualified training program and eligible trainee(s) used for each project as well as eligible 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. Proof of course completion from the qualified training program that includes eligible trainee name and date of completion must be attached to the Trainee Affidavit. This can be a certificate or email from the qualified training program. Both the Approved Vendor and eligible trainee(s) must complete and sign the Job Trainee affidavit after the eligible trainee's time on the

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<sup>49</sup> See 'Work Performance Tracking and the Role of the Job Trainee on ILSFA Projects' within Section 15.2 for details on how to track the work.

<sup>50</sup> See [Section 16-128A of the Public Utilities Act](#) and [83 Ill. Adm. Code 468](#) for additional details on the ICC requirement of using a Qualified Person.



project is completed. The Project Summary Affidavit identifies the hours worked on an ILSFA project by all employees (non-eligible trainees and eligible trainees) of the Approved Vendor and/or their subcontractors/installers/agents.<sup>51</sup>

- Failure to meet the job training requirements across directly managed projects and subsidiary managed projects can affect the Approved Vendor's qualified status for ILSFA. Failure to meet a single year's target will lead to a probationary 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 in a row will result in suspension from the program. Approved Vendors on probation can also be suspended for not meeting other program requirements.<sup>52</sup>
- Approved Vendors can apply for a Job Training Project 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 15.4.

## APPROVED VENDOR ANNUAL REQUIREMENTS CALENDAR

The Approved Vendor must meet job training requirements starting on the date of the beginning of construction of the Approved Vendor's first project contracted under the Program. If project development occurs over multiple years, the work hours for that project will be included in the year the construction began. This is especially important for large on-site projects and community solar projects, where development timelines can extend beyond a year. For example, if a project's contract date was January 15, 2019, and completed in September of 2021, the hours will count towards the Approved Vendor's first year and the Approved Vendor will be required to meet the 10% portfolio requirement, not 20%.

All Single Project Approved Vendor projects must meet the job training requirement of 10% of all hours being performed by eligible trainees.

## 15.2. Defining Eligible Trainees and Qualified Job Training Programs

### QUALIFIED JOB TRAINING PROGRAMS

Eligible trainees can come from one of two types of Qualified Job Training Programs: CEJA and FEJA Workforce Development Programs, including the CEJA and FEJA-funded Solar Contractor Accelerator Program, or Other Qualifying Programs (OQPs). CEJA and FEJA Workforce Development Programs include those programs described in Section 16-108.12 of the Public Utilities Act and approved in ICC Docket No. 17-0332 and OQPs include those programs described in 83 Ill. Adm. Code 468.20. See the ILSFA website at [www.IllinoisSFA.com/job-training/](http://www.IllinoisSFA.com/job-training/) for more details of current active Qualified Job Training Programs along with other job training and workforce development resources.

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<sup>51</sup> See the data collection requirements and affidavits in Section 15.3.

<sup>52</sup> See Section 3 for more information about disciplinary actions and processes.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the eligible trainee on an individual basis. Please review the [Project Waiver Evaluation Rubric for guidance](#)

## CEJA AND FEJA WORKFORCE DEVELOPMENT PROGRAMS

These include the following 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 18 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.
- DCEO will be launching the following programs created by CEJA and will be listed on the [Job Training page](#) of the ILSFA website.
  - Clean Jobs Workforce Network Programs
  - Illinois Climate Works Pre-apprenticeship Program
  - Returning Residents Clean Jobs Program
  - Clean Energy Contractor Incubator Program
  - Clean Energy Primes Contractor Accelerator Program
  - Energy Transition Barrier Reduction Program

## OTHER QUALIFYING PROGRAMS

ILSFA Approved Vendors may also hire eligible trainees from an Other Qualifying Program (OQP), so long as they can demonstrate that completion of the job training program would lead to the eligible trainee becoming a Qualified Person under the Ill. Adm. Code 468.20 related to the certification of installers of photovoltaic systems.

Ill. Adm. Code Part 468.20 provides that Qualified Person status may be conferred upon individuals who have successfully completed at least one of the following programs requiring lab or field work:

- 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; or
- An associate's degree in applied science from an Illinois Community College Board approved community college program in the appropriate distributed generation technology.

To become an Eligible Job Trainee for an ILSFA project from an OQP, an eligible trainee will have completed 50% or more of the classroom requirements for one of the training categories listed above. The application to become an OQP will request information such as detailed curriculum and official program accreditation documents.

## ELIGIBLE JOB TRAINEE

To become an Eligible Job Trainee, individuals will have completed 1) a qualified, CEJA or FEJA Workforce Development 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 of an OQP within the past 24 months. Additionally, an Eligible Job Trainee may come from a contractor/organization that is participating in the CEJA or 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 CEJA or 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 CEJA or 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 CEJA or FEJA Workforce Development Program.

The Program Administrator will work with CEJA and FEJA Workforce Development Programs to create opportunities for Approved Vendors to connect with and learn about contractors engaged in CEJA or FEJA training.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the Eligible Job Trainee on an individual basis. Eligible job trainees from both CEJA and FEJA Workforce Development programs and Other Qualifying programs are given equal consideration and no longer require Approved Vendors to prioritize recruitment from CEJA and FEJA Workforce Development Programs.

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

The Eligible Job Trainee(s) may participate in ILSFA 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. The work of the trainee(s) can be on or off the project site but must be specific to the ILSFA project.

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

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

System Design	Installation	System Commissioning
Site assessment	Install electrical	Interconnection
Shading analysis	Roofing	Visual and mechanical inspection
Electrical design	Structural	Component testing
Mechanical design	Racking	Electrical testing
Engineering	Modules	System monitoring
Procurement	Carpentry	User training
Permitting	Fencing	Utility commissioning
Zoning	Health and safety	
	Battery	
	Monitoring controls	
	Foundation	
Operations/Maintenance	Technical Sales/Other	
Preventative maintenance	Sales	
Corrective maintenance	Customer service	
System monitoring	Subscriber management	
Component testing	Financial modeling	
Component replacement		

## 15.3. Data Collection

### THE AFFIDAVIT PROCESS

The [ILSFA Job Training Project Summary Affidavit](#) and the ILSFA Eligible Job Trainee Affidavit documents must be completed for each ILSFA project. The affidavits include information about all employees working on ILSFA projects, the categories of work performed, and the number of hours for each. The affidavits will also include information on the qualifying job training program for each Eligible Job Trainee. Documentation of hours and salary supporting information recorded on the affidavits shall be accessible to the Program Administrator upon request for up to four years after the submission of the affidavits.

## APPROVED VENDOR ANNUAL TRACKING

Hours must be documented for all employees (non-job trainees and job trainees) of Approved Vendor or subcontractors/installers/agents 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 an Eligible 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 Eligible Job Trainees.

The calculation of X/Y will provide the percentage for each ILSFA project.

## CALCULATING PERCENTAGE OF ANNUAL PROJECTS REQUIREMENTS

To calculate the number of projects with Z as the numerator:

- Z will represent the total number of projects submitted by the Approved Vendor in one program year for each sub-program

The calculation of  $0.33 \times Z$  (rounded up to the nearest whole number) will provide the number of projects that have to utilize at least one Eligible Job Trainee. There are no minimum hour requirements for Eligible Job Trainee hours on individual projects. However, the Program Administrator will monitor the average hours assigned to Eligible 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 PROJECT WAIVER

Approved Vendors may submit a waiver request at the project level where good faith efforts have been made to meet job training requirements but were unsuccessful. AVs should support a claim of good faith efforts by documentation such as emails to workforce development programs and copies of job

postings on employment sites. 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-wide requirements or percentage of annual project requirements.

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 Eligible Job Trainees. Details on every qualified, CEJA-funded job training program can be found on the [ILSFA website](#). The Program Administrator can direct the Approved Vendor and/or their subcontractor/installer/agent to resources, contacts, hiring events, and more. The Approved Vendor is expected to proactively seek help early. Please see the [Project Waiver Evaluation Rubric](#) for guidance.

## WAIVER APPLICATIONS AND GOOD FAITH EFFORTS

The [ILSFA Project Waiver for Job Training Requirements](#) (Project Waiver) 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/agent to meet the job training requirements. Waivers will be considered on a case-by-case basis. Each Project Waiver application will come to a determination of pass or fail based on these responses and associated documentation.

- General Efforts:
  - Did you have Eligible Job Trainees currently on staff?
  - Were Eligible Job Trainees employees of your firm previously (but not currently)?
  - Do you have subcontractors/installers you have worked with in this performance year who currently have Eligible Job Trainees on staff?
  - Have you interviewed Eligible Job Trainees for positions at your firm?
  - Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Eligible Job Trainees?
  - Did you include the ILSFA job training requirement goal in your subcontract agreements?
- Outreach Efforts:
  - Did you contact Qualified/Other Qualifying Training Programs directly to seek eligible 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 your outreach include information such as job descriptions, locations, pay scale and benefits, etc.?
  - Did you invite subcontractors/installers with Eligible Job Trainees to bid for this project?
  - Did you contact employees to gain referrals to Qualified/Other Qualifying Training Programs?
  - Did you advertise Eligible Job Trainee employment opportunities on job boards.
  - Did you provide a clear explanation of the work opportunity to attract Eligible Job Trainees?
- Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Eligible Job Trainees?

Within the Project 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. [Please see the Project Waiver Evaluation Rubric](#) for guidance.

## 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. Twenty percent 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, eligible 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, eligible 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.

Instances of an Approved Vendor providing false or misleading information in project submissions or the discovery of subsequent infractions while an Approved Vendor is on probationary status, may lead to suspension from the program.

## 15.6. 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 avenues, such as job fair events, job boards, and job training organizations 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 46 of the Illinois Administrative Code, where “Qualified Person” is defined, to best assist them when working with eligible trainees from OQPs. Additionally, Approved Vendors/contractors should become familiar with best practices in creating quality work-based learning experiences.

- Learn about CEJA Training Programs by reviewing the ILSFA Job Training webpage: [www.IllinoisSFA.com/Job-Training/](http://www.IllinoisSFA.com/Job-Training/).
  - This page will contain updated lists of CEJA Workforce Development Programs and OQPs 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 must 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 [NABCEP website](#).
  - NABCEP PV Certification Job Task Analysis (JTAs)
    - [Photovoltaic Specialists Job Tasks Analysis \(Photovoltaic Design, Photovoltaic Installer, Photovoltaic Commissioning and Maintenance\)](#)
    - [PV Installation Professional Job Task Analysis](#)
    - [PV Technical Sales Job Task Analysis](#)
    - [PV System Inspector Job Task Analysis](#)
- Learn about Part 46 and the definition of a Qualified Person when hiring from an OQP. Approved Vendors should know what a Qualified Person is, per Title 83, [Part 468](#) of the Administrative Code.
- 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 Strategies for Solar Workforce Development Toolkit (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 Eligible Job Trainees for their projects (and the challenge trainees may face in finding opportunities) and will do their best to facilitate the connection of Approved Vendors to Eligible Job Trainees.

Two ILSFA Program Administrator staff members will be designated resources for Approved Vendors to ensure their understanding and fulfillment of the ILSFA job training requirements: the Approved Vendor's 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 CEJA Workforce Development Programs and OQPs 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 trainee recruitment. The administrative team is invested in seeing Approved Vendors succeed in the program and will update resources and materials to incorporate feedback, other program changes, or provide clarifications as needed.

## 16. Complaint Management

The 2022 Long-Term Plan includes a new document, the Consumer Protection Handbook, which updates and consolidates the ABP Community Solar Marketing Guidelines and Distributed Generation Marketing Guidelines, as well as the ILSFA Community Solar Consumer Protection Requirements and the Residential Solar Consumer Protection Requirements. Approved Vendors and Designees in both programs will be required to adhere to the [Consumer Protection Handbook](#) (“CP Handbook”).

The CP Handbook includes several new requirements, clarifications, and provisions including but not limited to:

- Explanations of what would make an act or practice unfair or abusive
- A requirement that Approved Vendors and Designees be responsive to customer questions and concerns and respond as promptly as possible, but no later than within seven business days
- Requirements regarding compliance with contractual obligations, conducting business in a profession manner, and providing services in a workmanlike manner
- Requirements regarding cooperation with investigations and truthfulness to the Program Administrator and Agency
- Explanations of the disciplinary process and consequences for violation of program requirements
- Required disclosures for all marketing channels
- Required disclosures and record retention requirements for telemarketing
- Requirement that the relevant utility account holder must be the signatory on the Disclosure Form (or, if the if the account holder is a company or organization, an individual authorized to sign on behalf of the account holder)
- Requirements regarding the use of third-party commercially available e-signature platforms
- Requirements regarding how Disclosure Forms should be completed

As mentioned in the consumer protection guidelines for ILSFA projects, income-eligible communities have often been targeted with false or deceptive marketing practices, predatory sales, unfair contracts, and poor-quality workmanship. The CP Handbook requires 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, installation and maintenance, warranty, billing, or customer service. If the issue cannot be resolved, the participant may contact the ILSFA

Program Administrator by emailing [info@IllinoisSFA.com](mailto: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 contact the Illinois Attorney General's office by calling one of the following hotlines:

**Chicago**

800-386-5438

TTY: 800-964-3013

**Springfield**

800-243-0618

TTY: 877-844-5461

**Carbondale**

800-243-0607

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 outlined in Section 7 of this manual and the CP Handbook can greatly reduce the number of participant complaints. ILSFA Approved Vendors are expected to work with the customers, prospective customers, and grassroots education organizations in a responsive, forthright, and constructive manner. All Approved Vendors, Designees, and subcontractors are expected to conduct any and all business affiliated with the ILSFA program in a responsible manner that fosters integrity and public confidence, including responding to all public inquiries as promptly as possible, but no later than seven business days. Potential participants who are judged to be non-eligible, already enrolled, or otherwise without next steps should also be notified promptly, within seven business days.

Approved Vendors are expected to adhere to the information they shared with the Program Administrator and grassroots education organizations indicating which subscribers will be accepted for community solar projects and what standardized offers are available for distributed generation projects. Approved Vendors that are uncertain of what they can offer should specify this. Approved Vendors should promptly notify the Program Administrator if they expect delays or other capacity limits that will affect the project information previously shared with the Program Administrator. 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.

An Approved Vendor or Designee must report any complaints by Illinois Solar for All participants made to itself, or anyone acting on its behalf, to the Program Administrator. Complaints by ILSFA customers directed or conveyed to Approved Vendors should be acted upon promptly, with initial contact made within 24 hours of notice.

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 shall 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 Manager will contact the Approved Manager to discuss appropriate resolution.

As detailed in Section 9.6 of the 2022 Plan,<sup>53</sup> the Agency maintains a [public database of consumer complaints](#) for and provides an annual written report to the ICC documenting the frequency and nature of complaints, and any enforcement actions taken. The first such report, covering calendar year 2019, was filed on March 2, 2020 and can be found at the bottom of the public database of consumer complaints webpage linked above. A similar database for ILSFA can be found [here](#).

## 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 that 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, not having a full understanding of the process and the system, or not receiving responses from Approved Vendors in a timely manner. 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

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<sup>34</sup> Section 7.13.3 applies specifically to the Adjustable Block Program, but Section 8.2.1 of the Revised Plan makes clear that the general terms and conditions of the 2022 Plan's Chapter 7 will apply to ILSFA unless otherwise specified.

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 well-being 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.

#### TABLE 16.1. INCIDENT TYPE AND REPORTING TIMEFRAMES

The following incident types have a reporting timeframe of 3 hours (verbally) and 24 hours (written)

- Violation of formal ILSFA requirements
- Loss or theft of personal electronic device (laptop, smartphone, tablet, etc.) containing client's confidential information
- Breach of participant's confidential information
- Condition that draws, or may draw, negative media attention

A 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) should be reported in 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 sought 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

The IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in the ILSFA 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 as confidential or proprietary to maximize the likelihood that such 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 netting statements, 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 ICC 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 For Vendors page of the ILSFA website at [IllinoisSFA.com/for-vendors/](https://IllinoisSFA.com/for-vendors/).

The manual will be updated both as the program changes and as additional questions and issues arise. Updates to the manual will be made by the IPA in consultation with the Program Administrator. Such

changes will be announced on the ILSFA website at [IllinoisSFA.com/announcements/](https://illinoisSFA.com/announcements/); the version of the manual published through the website will always be the latest version.

Changes to manual versions will be red-lined and indicated by alternate version numbering. A summary of changes will be provided in the appendix with any subsequent version as well.

## 19. Appendix

### 19.1. Approved Vendor Manual Updates

#### SIGNIFICANT REVISIONS :

- Section 1: Added information about [Public Act 102-0662](#) (known as the Climate and Equitable Jobs Act or CEJA)
- Section 1: Removed Grid Alternatives as the partner firm for coordination on job training
- Section 1: Added information on Existing and New Design Elements, including:
  - a. Small and Emerging Business Development,
  - b. Energy Sovereignty,
  - c. Equity and Environmental Justice Programs (Equitable Energy Future Grant Program and Community Solar Energy Sovereignty Grant Program)
  - d. Energy Efficiency Programs and Community Action Agencies
  - e. Climate Bank and Clean Energy Jobs and Justice Fund
  - f. Equitable Energy Upgrade Program
- Section 2: Changed Sub-Program Names
- Section 2: Extended the time period during which the Program Administrator-provided income verification is valid from 6 to 12 months
- Section 2: Eliminated the requirement to present and sign the disclosure form seven days prior to consummation of the contract along with extending the cancellation period to simplify the customer engagement process.
- Section 2: Removed the minimum batch requirements
- Section 2: Updated REC incentives and added the \$10 per REC adder for on-site Energy Sovereignty projects
- Section 2: Removed the 100% Low-Income Owned Community Solar Project REC adder
- Section 2: Removed the Small Subscriber REC adder for Community Solar Projects
- Section 3: Added language for Single Project Approved Vendors for project transfers
- Section 3: Added language about outreach to prospective small and emerging and MWBE Approved Vendors
- Section 4: Added that Approved Vendors wanting to be listed on the ILSFA Small Residential Offers Document must have completed a small residential ILSFA project prior to being added to the document.

- Section 4: Added that ILSFA will no longer allow distributed generation projects serving multifamily residential facilities to participate in the Non-Profit and Public Facilities sub-program since these types of projects qualify to apply for the Residential Solar (Large) sub-program
- Section 4: Added that ILSFA will not include public schools in the Non-Profit and Public Facilities sub-program after the 2022-2023 program year.
- Section 4: Added updated Project Section Protocol document and points for Community Solar anchor tenants
- Section 5: Added language clarifying tangible benefits
- Section 6: Added link to updated Income Eligibility chart for 80% AMI
- Section 6: Added that the Program Administrator will still accept proof of LIHEAP or IHWAP approval as documentation of income eligibility, but with additional verification with DCEO to confirm household income eligibility to reduce inconvenience to the customer or the Approved Vendor.
- Section 6: Changed income verification method from U.S. Department of Housing and Urban Development Qualified Census Tract to Income-Eligible Census Tract and ILSFA Community Mapping Tool
- Chapter 7: Added link to IPA Consumer Protection Handbook
- Chapter 8: Added that in order to expedite processing of ILSFA projects there is no minimum batch size requirement.
- Chapter 8: Added once an ILSFA REC contract is sent to the ICC for approval it is no longer eligible for the ABP
- Chapter 8: Updated sub-program names for the Disclosure Forms and linked to new forms.
- Chapter 8: Added that Approved Vendors may present participants with the Disclosure Form and installation contract in the same interaction and both documents can be executed contemporaneously.
- Chapter 8: Added as an additional consumer protection that the customer has the right to cancel within 14 calendar days of executing the contract.
- Chapter 8: Added items that would make an ILSFA project ineligible.
- Chapter 8: Added language clarifying proof of site ownership
- Chapter 8: Added requirements for interconnection agreements older than 16 months and land use permits for ground mounted systems over 250 kW
- Chapter 8: Added language prohibiting an application from being withdrawn and resubmitted in order to receive a higher REC price
- Chapter 8: Added project approval requirements for Community Solar projects
- Chapter 9: Added language about project selection and energy sovereignty carveouts
- Chapter 9: Updated link to Project Selection Protocol document
- Chapter 10: Increased the maximum ILSFA system size to 5 MW (formerly 2 MW)
- Chapter 10: Removed language requiring a detailed schematic showing only solar generated power was used to charge a battery for a system with battery back up
- Chapter 10: Removed language about providing feedback to IPA about DC-only systems
- Chapter 11: Added language about a third set of contracts for PY5

- Chapter 11: Added language requiring Approved Vendors to confirm community solar subscription levels with their Vendor Manager and provide net metering lists
- Chapter 11: Added language for energy sovereignty community solar projects including a request for feedback and cooperative models
- Chapter 12: Updated Annual Report process
- Chapter 12: Added the requirement that community solar subscriber details and disclosures should be submitted to the portal no later than 30 days prior to the end of the delivery year
- Chapter 12: Added language about community solar collateral
- Chapter 13: Added language regarding quarterly netting statements, invoices and Part II review process
- Chapter 14: Added Approved Vendor Photo Guide
- Chapter 14: Added language about onsite, live inspections
- Chapter 15: Changed Qualified Trainees to Eligible Trainees
- Chapter 15: Removed language about OQPs (other qualified providers)
- Chapter 15: Added list of DCEO job training programs
- Chapter 15: Removed language about contractors who began training in a FEJA Workforce Development Program prior to the ILSFA launch
- Chapter 15: Changed references from FEJA to CEJA
- Chapter 16: Added language about the IPA Consumer Protection Handbook and the related new requirements, clarification and provisions in the Handbook
- Chapter 16: Deleted table 16.1 Incident Type and Reporting Timeframes