

**From:** [Amrita Garcia](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** End use of ILSFA dollars to Police  
**Date:** Friday, October 7, 2022 11:32:39 AM

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Hello Elevate Energy and Illinois Power Authority,

Illinois Solar for All, as a State of IL program intending to benefit residents in low-income and/or environmental justice communities and our formerly incarcerated neighbors must disallow carceral institutions from using the carve out for nonprofits and public facilities in low-income or environmental justice communities (or receive any funds from this program) as they DO NOT improve living conditions, financial status, environmental and health status, and other social welfare indicators. They should NOT be considered critical service providers, because they are NOT. I do not believe that a program that seeks to reckon with Illinois complicity in the racial prison pipeline should provide assets or funding to institutions that were founded on, and continue to operate under, racist, classist and non trauma informed strategies.

Be on the right side of history: disallow the use of ILSFA funds to such careless and cruel institutions.

Amrita Garcia

**From:** [Andrea Chu](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** NO ILSFA dollars to police!  
**Date:** Friday, October 7, 2022 12:25:34 PM

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Hello Elevate Energy and Illinois Power Authority,

Illinois Solar for All, as a State of IL program intending to benefit residents in low-income and/or environmental justice communities and our formerly incarcerated neighbors must disallow carceral institutions from using the carve out for nonprofits and public facilities in low-income or environmental justice communities (or receive any funds from this program) as they DO NOT improve living conditions, financial status, environmental and health status, and other social welfare indicators. They should NOT be considered critical service providers, because they are NOT.

I do not believe that a program that seeks to reckon with Illinois complicity in the racial prison pipeline should provide assets or funding to institutions that were founded on, and continue to operate under, racist, classist and non trauma informed strategies.

Be on the right side of history: disallow the use of ILSFA funds to such careless and cruel institution!

Thank you for your time,  
Andrea Chu

**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** Comment regarding appropriate use of IL Solar for All funds  
**Date:** Friday, October 7, 2022 9:40:13 AM

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Hello,

I am writing to share my objection to the use of Illinois Solar for All funds for projects at police stations, jails, prisons, and immigration detention centers. The use of these funds cannot be said to benefit communities that have suffered inequitable environmental or economic conditions, if they are being directed to institutions that have historically and to the present, extended and intensified the marginalization of those same communities.

Thank you for your consideration of this comment.

-

[REDACTED]  
Chicago

**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** objecting to the use of Illinois Solar for All funds for projects at police stations, jails, prisons, and immigration detention centers  
**Date:** Friday, October 7, 2022 12:00:21 PM

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Hello,

I am a Social Worker in Cook County, IL. that specializes in reentry work and know firsthand how difficult it can be for community organizations and institutions to support their programming and help people recently released from prison. Thus, I oppose the use of Illinois Solar for All funds for projects at police stations, jails, prisons, and immigration detention centers as they do not improve the overall well being of low-income communities. Community organizations need and could truly utilize benefits like the Illinois Solar for All program.

Best Regards,

[REDACTED]

**From:** [Corey Buttry](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** Illinois Solar for All Funds  
**Date:** Thursday, October 6, 2022 10:06:08 PM

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Hello,

I am writing to express my concern about Illinois Solar for All funds being used for projects at police stations, jails, prisons, and immigration detention centers. These institutions, as they exist today, actively work against the health, financial and general well being of low-income communities. We should be transitioning out of the business of state violence and embracing a fossil free future in service to communities worthy of investment.

Thank you,  
Corey J. Buttry

**To:** ILSFA Program Administrator  
**From:** Jay Corgiat and Participants in the Illinois Solar for All Working Group  
**Date:** 10/7/2022  
**Re:** ILSFA Working Group Comments on the ILSFA Approved Vendor Manual

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Dear Illinois Solar for All Program Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments in response to the IPA's Illinois Solar for All Evaluation Request for Stakeholder Feedback. This memo describes an overview of the Illinois Solar for All Working Group.

Background: Illinois Solar for All Working Group

The Illinois Solar for All Working Group (the Working Group) formed from a subset of members of the Illinois Clean Jobs Coalition, who had comprised an Environmental Justice-Solar-Labor Caucus (the Caucus) during the negotiation of policies that would become the Future Energy Jobs Act (FEJA). The group formed in order to bring the best practices and policies to the Illinois energy landscape that would serve to maximize benefits to the economically disadvantaged households and communities that targeted programs are intended to serve. The group was co-facilitated by a representative of a solar company, Amy Heart of Sunrun, and a representative of an environmental justice group, Juliana Pino of the Little Village Environmental Justice Organization.

Following passage of FEJA in December 2016, the Caucus expanded into the Illinois Solar for All Working Group, an open membership group including experts on environmental justice, environmental advocacy, consumer protection, solar business, low-income solar policy, energy efficiency, job training, program design, and other areas, who have substantive research and experience to bring to bear on implementation of Illinois Solar for All. Currently, the Illinois Solar for All Working Group meets on a monthly basis and is co-facilitated by Juliana Pino of Little Village Environmental Justice Organization and John Delurey of Vote Solar.

The following members of the Working Group are signatories to these comments:

Central Road Energy LLC	Vote Solar
Trajectory Energy Partners	
SustainRockford	
Seven Generations Ahead	
Citizens Utility Board	
Illinois People's Action	
Central Illinois Healthy Community Alliance	
Renewable Energy Evolution	

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## Working Group Commenting and Engagement History for IL Solar for All

- A draft White Paper delivered to the IPA in May 2017 and [published](#) that July.
- [Responses](#) to IPA's June 2017 Request for Comments on the Long-Term Plan.
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.<sup>1</sup>
- Additionally, the group has engaged in stakeholder sessions and submitted comments on:
  - Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClima on December 10, 2018;
  - Grassroots Education and Approved Vendor components on January 9, 2019;
  - Environmental Justice provisions on January 30, 2019;
  - Job Training provisions and Third-Party Evaluation provisions on February 7, 2019;
  - Project and Participant Eligibility and Verification Processes on March 13, 2019;
  - the Low-Income Community Solar REC contract on April 2, 2019;
  - Project Selection on April 15, 2019; and
  - Consumer Protection on April 19, 2019.
- Many Working Group participants also attended IPA's June 2019 workshops and helped develop the Working Group's response to IPA's July 3, 2019 Request for Comments on the Long-Term Plan Update.
- The Working Group continues to provide input to comment and stakeholder processes initiated this year to implement the Revised Long-Term Plan, including via May 2020 comments on project selection and July 2020 comments on Approved Vendor reporting.
- In early 2021 the Working Group submitted comments on the [DG subprogram referral](#) process and [project selection](#), as well as on the community solar pilot procurement.
- In summer 2021, the Working Group submitted multiple sets of comments following IPA workshops on the Long-Term Plan Update, specifically:
  - [Comments on strengthening MWBE participation in renewables programs/procurements.](#)
  - [Comments on the Solar for All and Adjustable Block Programs, generally.](#)
  - And [comments on REC pricing.](#)
- And following the passage of CEJA in fall 2021, the Working Group submitted additional comments regarding the Long-Term Plan Update.
- Attendance by multiple Working Group participants at many (likely, all) IPA and Program Administrator public workshops and webinars related to the Solar for All Program, since 2017.
- The Working Group submitted comments regarding the ILSFA program evaluation in response to the IPA's July 2022 request for stakeholder comments.

## Program Principles for Illinois Solar for All

During the negotiation of FEJA, the Caucus membership collectively agreed upon the following policy principles to guide our work moving forward. These principles were rooted in the *Low-Income Solar Policy Guide*<sup>2</sup> authored by GRID Alternatives, Vote Solar, and the Center for Social Inclusion; further

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<sup>1</sup>

<https://www2.illinois.gov/sites/ipa/Documents/2018ProcurementPlan/2018-LTRenewable-Illinois-Solar-for-All-Working-Group-Comments.pdf>

<sup>2</sup> [www.lowincomesolar.org](http://www.lowincomesolar.org)

adapted through iterative deliberations in the Caucus; and ultimately adopted by the Working Group. The principles include:

- **Affordability and Accessibility.** Offers opportunities for low-income residents to invest in solar through a combination of cost savings and support to overcome financial and access challenges. Creates economic opportunities through a job training pipeline. Supports skill development for family-supporting jobs, including national certification and apprenticeship programs.
- **Community Engagement.** Recognizes community partnerships are key to development and implementation, ensuring community needs and challenges are addressed. Strive to maximize projects located in, and serving, environmental justice (EJ) communities. Allows for flexibility for non-profit/volunteer models to participate, and strives to meet potential trainees where they are, with community-led trainings.
- **Sustainability and Flexibility.** Encourages long-term market development and will be flexible to best serve the unique low-income market segment over time and as conditions change. Program administrator ensures community engagement, statewide geographic equity, and flexibility to meet goals. Job training program includes all training partners in design and implementation. Training offerings should come through diverse channels including utilities, unions, tech schools, non-profits, government agencies, and existing community-based job training organizations.
- **Compatibility and Integration.** Low-income program adds to, and integrates with, existing renewable energy and energy efficiency programs, and supports piloting of financing tools such as PAYS (pay-as-you-save), on-bill financing, PACE or community-led group buy programs. Job training programs will strive to ensure low-income solar installations incorporate workforce development, including coordinating opportunities for job training partners and individual trainees from the same communities that the low-income solar program aims to serve.

The Working Group researched and prepared the enclosed comments to deliver high quality information and recommendations for the Program Administrator's consideration. The contents are not intended to reflect universal consensus on any point amongst working group members. These contents reflect extensive deliberation regarding aspects that the Working Group believes are important to the Program's success moving forward. Please do not hesitate to contact us with questions or comments in regards to this matter.



# Illinois Solar for All Working Group Comments

The Illinois Solar for All Working (ILSFA) Group is pleased to submit the following comments in response to the Illinois Power Agency and the ILSFA Program Administrator request for feedback on the proposed changes to the Approved Vendor Manual. We have reiterated the specific questions for those comments for which we have provided feedback. We greatly appreciate the opportunity to comment and the continued efforts of the Agency and the Administrator to improve the program under the tight deadlines imposed by CEJA.

- *Energy Sovereignty*
  - *Community Solar:*
    - *Section 2.3 Illinois Solar for All: Section 8.2.2 of the 2022 Plan allows Community Solar Sub-program projects that promote energy sovereignty and are structured as cooperatives to charge a “nominal fee” as an up-front cost to a participant to join the cooperative.*

*The Agency and Program Administrator are interested in stakeholder input on methodologies to establish a cap for that nominal fee that is consistent with financing models being used or under consideration for use on ILSFA energy sovereignty projects.*

**Response:** In the spirit of the ILSfA program, we feel the “nominal fee” should not exceed 50% of the value of energy generated by the participant’s share of the PV system in the first year for this initial round of Community Solar Sub-program projects that promote energy sovereignty and are structured as cooperatives. Because of the long lead time for the development of community solar projects, we do not expect to see much, if any, demand for these projects in PY5. We encourage the program administrator to nurture early lines of communication with developers that are considering this model and to work with them to better understand how these projects are financed. This feedback can then be anonymized and shared with interested stakeholders. This process will help to establish future “nominal fee” guidelines that provide adequate money for development/purchase of a community solar project by a cooperative while protecting cooperative members from predatory sales and unfair contracts.

- *Section 4.3 Community Solar Project Eligibility has a list of requirements for how projects within the Community Solar sub-program can qualify as energy sovereignty projects for the purpose of the Project Selection Protocol under either an ownership model or cooperative model.*

*Are the contract types and specifications sufficient to capture the breadth of ownership models? Are there additional requirements that should be added to require a certain percentage of ownership shares beyond a majority (>50%) ownership threshold?*

**Response:** The Working Group believes that the current proposed Approved Vendor manual does not adequately capture the breadth of ownership models intended by the Climate and Equitable Jobs Act (CEJA).

Public Act 102-0662 Section 1-56(b)(2)(A)(i) requires the Agency to reserve “a portion” of Illinois Solar for All funding “for projects that promote energy sovereignty through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.”

We believe the law intended for ownership by any of the above outlined entities to meet the criteria of energy sovereignty. For example, a non-profit organization providing services to low-income households (e.g., a non-profit that owns and manages low-income housing) meets the intended definition.

The Long-Term Renewable Resources Procurement Plan (LTRRPP) Section 8.2.4 states:

The Agency believes that majority or full ownership by individuals or community institutions listed by Section 1-56(b)(2)(A)(i) is the most direct way to ensure that local people will have control over and reap the benefits from photovoltaic energy projects. The Agency originally proposed to define “energy sovereignty” as the eligible low-income household or community organization having or being on a defined path to majority or full ownership of the photovoltaic facility. After consideration of stakeholder comments and per the Commission’s Order approving this Plan, the Agency adopts the following definition of “energy sovereignty” for the Illinois Solar for All program:

“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.

The LTRRPP also makes clear that ownership by a community organization of the types listed in Section 1-56(b)(2)(A)(i) of CEJA meet the definition of energy sovereignty.

Additionally, we think some additional clarity may be helpful within the suggested requirements for these models. The language in the list from Section 4.3 of the AV manual reads:

“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.”

Almost identical language is included for the cooperative model and the energy sovereignty language included for NP/PFs.

This language seems to imply that costs for Operations and Maintenance (O&M) can be transferred to the NP/PF with transfer of ownership. We feel this conflicts with the contract requirements document issued by the program, which requires the original asset owner to provide O&M for the 15 years of the REC contract.

We also note that insurance cannot be transferred. New insurance would have to be obtained by the new owner. Furthermore, warranties are typically associated with the equipment and are not held by a particular party so it would not be necessary to “transfer” a warranty.

- *What additional consumer protections or customer contract requirements are needed to define how Energy Sovereignty Ownership subscriptions are sold?*

**Response:** We support the current requirements but believe vigilance will be necessary to protect consumers. We trust that the program will work with stakeholders to monitor the projects and respond appropriately to subscriptions issues that will arise as these projects develop. Transferability - the ability for one subscriber to pass on or even sell the benefits of ownership to a specific project - will likely be one such feature to track closely. It is simply too early to know what types of new consumer protection issues will arise from new energy sovereignty projects. The ILSFA Working Group is grateful for the new Consumer Protection Working Group hosted by the IPA to focus on ongoing consumer protection concerns in the ABP and ILSFA programs.

- *How should ownership turnover be measured in terms of maintaining subscription levels for Community Solar projects?*

**Response:** We think some flexibility needs to be incorporated into the subscription level requirements to prevent burdensome paperwork and reporting for the new owners and the unnecessary clawback of RECs. We suggest that subscription levels should be maintained at or above the REC contract requirement for at least 27 of the 36 months of a running three year total.

- *The Program Administrator and Agency are interested in feedback on allowing for-profit anchor tenant owners in Energy Sovereignty Community Solar projects. For-profit anchor tenants could represent either corporate or small- and/or locally-owned businesses.*

**Response:** We support the use of for-profit anchor tenant owners for Energy Sovereignty Community Solar projects at this stage of the program. If demand for these RECs increases to the point that the projects must compete for a REC contract, we would like the project selection protocols to favor those projects that maximize small subscribers. If an anchor tenant is utilized, the scoring protocols should favor NP/PFs over for-profit anchor tenants, and small- and locally-owned businesses and those with clear commitments to social and environmental change, such as B Corporations, over other types of for-profit entities.

- *For Non-Profit and Public Facility or Residential Energy Sovereignty projects, what additional consumer protections or customer contract requirements are needed to ensure that buyout structures before year seven meet the intent of the law to “ensure that local people have control of the project and reap benefits from the project over and above energy bill savings?”*

**Response:** We feel that the highest form of energy sovereignty is full ownership by the NP/PF, the income-eligible residents, or a closely-associated Community Based Organization (CBO). With full ownership, the NP/PF, the income-eligible residents, and/or the CBO will exercise complete project control and will be able to distribute or utilize any profits beyond the energy savings as they see fit. At this stage of the program, we feel that this is the only form of energy sovereignty that should qualify the project for the project selection protocol points and for the energy sovereignty adder. We advocate that NP/PF sovereignty models that provide partial or incomplete ownership should be vetted through the stakeholder comment process before they are allowed to garner points or receive the adder.

- *Income Verification and Eligibility*
  - *In Section 6 Project and Participant Verification, the Program Administrator provides a list of categories that are or are not considered as income. This list was initially formed as part of the program’s development phase with the input of stakeholders and is meant to align with LIHEAP guidelines (which is the most frequently used 3rd party income verification method). Given the updates to the 80% AMI income limits, and other Program changes since initial program development, are there other changes that should be made to this list?*

**Response:** We advocate that the New Market Tax Credit (NMTC) Maps be utilized to determine Income Eligibility Status in combination with the mapping undertaken by the program, where appropriate (e.g., NP/PF subprogram). That is, if a project location is eligible for NMTC, it should qualify as income eligible for the program.

- *Tangible Benefits*

- *In Section 2.2 Illinois Solar for All: Community Solar Sub-program and in Section 5 Tangible Benefits and Value to Participants, language was added to clarify the process of identifying tangible benefits for residents of master-metered residential buildings. Benefits must be available and communicated to all tenants of master-metered residential buildings, regardless of income level, and cannot represent necessary repairs or renovations. This creates a challenge of ensuring residents are seeing benefits while not creating an overly burdensome system of ongoing tracking and verification.*

*The Program Administrator is interested in feedback on this process and if additional information would be helpful to streamline the process for both Approved Vendors and building owners to collect and submit information initially and on an ongoing basis.*

**Response:** With the to-date poor response from developers to the Residential Solar (Large) subprogram, the ILSFA Working Group does not want to place additional restrictions that may hamper or discourage participation in that particular program. We suggest that the developer and building owner propose how the “tangible benefits” will be demonstrated or tracked over the course of the REC contract. We hope that the Program Administrator will be able to work with stakeholders to ensure that the project delivers true tangible benefits, and that the compliance plan is adequate.

- *Project Submission Process*

- *The 2022 Plan included a number of changes to the project submission process to increase participation, lower soft costs, and simplify customer acquisition procedures including:*
  - *Extending the time period during which the Program Administrator-provided income verification is valid from 6 to 12 months (Section 2.1).*
  - *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.*
  - *Removing the minimum batch requirement (Section 8.1) and improving the project submission experience.*
  - *Redesigning the disclosure forms for ILSFA to shorten and simplify the documents.*
  - *Expanding Method D of Income Verification for Community Solar subscribers, allowing use of income affidavits to document eligibility for residents of Income-Eligible Census Tracts, where at least half the households are below 80% AMI (Section 6).*
  - *Adding Approved Vendor Photo Guide to Approved Vendor Manual (Section 14).*

- *Removing prioritization of FEJA Workforce Development trainees for ILSFA job training requirements (Section 15).*
  - *Removing required proof of satisfying non-ministerial permit requirements (Section 8.4).*
- *The Program Administrator and Agency believe the Program should maintain robust protections against gaming, substandard work, and a negative customer experience, but are open to feedback on further process improvements.*

**Response:** We support these changes and appreciate the Program’s efforts to streamline and simplify the project submission process while protecting vulnerable consumers. We understand that the change in the ABP Administrator resulted in a number of changes to the ABP AV application portal that have only recently been unveiled. These changes precluded the many of the desired modifications to the ILSfA program necessary to better match the ABP portal, especially for the Residential Solar (Small) Program. We do hope that future iterations of the ILSfA portal will be able to better align with the ABP portal to the extent that this is possible.

- *Other Issues:*

- **Energy bill fluctuations and the potential impact on ILSFA savings calculation.** The Carbon Free Energy Resource Adjustment is a credit that is being issued to all of ComEd’s delivery customers for the June 1, 2022-May 31, 2023 delivery year. This credit is creating some uncertainty for the ILSFA savings calculator, particularly for the NP/PF subprogram that cannot utilize a standardized price to determine the value of the energy to the NP?PF that is offset by the proposed solar array. We encourage the Program Administrator to monitor the program closely while the developers and Approved Vendors adapt to a fluctuating energy landscape. For example, energy prices are considerably higher in Ameren than in ComEd territory at the moment, largely because the Carbon Free Energy Resource Adjustment bill credits are offsetting energy price increases for ComEd customers. This could lead to disproportionate development in downstate Illinois where it is easier to demonstrate and provide energy savings based on current energy costs. While the ILSFA Working Group is not proposing any changes to the Approved Vendor manual at the moment, we hope to assist the Program Administrator in ensuring that projects are distributed equitably across the state.

**From:** [june forthemoon](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** No ILSFA dollars to Police!  
**Date:** Friday, October 7, 2022 5:31:39 PM

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Hello Elevate Energy and Illinois Power Authority,

I am writing you to add another voice of support for ISFA to be in the right side of history and ensure its program prioritizes those most in need and does not allow access to funds for law enforcement/carceral institutions.

Illinois Solar for All, as a State of IL program intending to benefit residents, especially Black and brown community members living in low-income and/or environmental justice communities and our formerly incarcerated neighbors must disallow carceral institutions from using the carve out for nonprofits and public facilities in low-income or environmental justice communities (or receive any funds from this program).

Thank you -  
Kim Nguyen  
Uptown

**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** Public comment- remove Police from ISFA CSP list  
**Date:** Thursday, October 6, 2022 10:04:56 PM

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To whom it may concern-

I am writing to comment on the Illinois Solar for All definition of Critical Service Providers under the Non-Profit and Public Facilities sub-program.

Police are not critical service providers. They are an oppressive force in environmental justice communities and a barrier to a just transition.

ISFA funds are better spent at nonprofits and public institutions with deep roots in their communities. For years of budget cuts and shutdowns, those institutions struggled. Many closed. During the state budget impasse, [combined state and local funding for police, jails and prisons steadily increased](#).

I am an energy professional at an Illinois higher-educational institution. I advocated for FEJA and CEJA along with thousands of others. I feel deeply that the ISFA funds should support institutions like the one I work for and grassroots organizations, not well-funded police forces.

The programming language should be amended to remove police departments from the list of Critical Service Providers. Further, it should explicitly ban police departments, jails, prisons, and immigration detention centers from receiving funding under the program.

Now is the time to invest public funds in community benefits. ISFA funds should not be used to greenwash the reputation of the police.

Sincerely,

[REDACTED]



**From:** [Megana Audipudy](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** No More IL Solar for All Dollars to Police  
**Date:** Friday, October 7, 2022 8:25:46 AM

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Hello Elevate Energy and Illinois Power Authority,

Illinois Solar for All, as a State of IL program intending to benefit residents in low-income and/or environmental justice communities and our formerly incarcerated neighbors must disallow carceral institutions from using the carve out for nonprofits and public facilities in low-income or environmental justice communities (or receive any funds from this program) as they DO NOT improve living conditions, financial status, environmental and health status, and other social welfare indicators. They should NOT be considered critical service providers, because they are NOT. I do not believe that a program that seeks to reckon with Illinois complicity in the racial prison pipeline should provide assets or funding to institutions that were founded on, and continue to operate under, racist, classist and non trauma informed strategies.

Be on the right side of history: disallow the use of ILSFA funds to such careless and cruel institutions.

Thank you,

Megana Audipudy  
(*she/her*)

**From:** [Mica](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** Illinois Solar for All  
**Date:** Friday, October 7, 2022 11:00:02 AM

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To Whom It May Concern,

This is a letter objecting to use of Illinois Solar for All funds for projects at police stations, jails, prisons, and immigration detention centers. These centers do not aid in the collective health and sustainability of our communities and any allocations of funds only further the harm that they inflict on so many individuals and families daily. Any show of support to these institutions is a vote and a contribution of your organization to the certain continual collapse in our collective economies and environment. We cannot address our climate catastrophe until everyone is free, supported and able to engage in the work of changing our world. There are many other deserving community based organizations these funds would be much more wisely invested and I would hope you all will choose to prioritize their work.

Sincerely,  
Mica Thompson

**From:** [Pooja Ravindran](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** Oppose use of ILSFA funds for Police and Prisons  
**Date:** Friday, October 7, 2022 6:17:02 AM

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Hello Elevate Energy and Illinois Power Authority,

Illinois Solar for All, as a State of IL program intending to benefit residents in low-income and/or environmental justice communities and our formerly incarcerated neighbors must disallow carceral institutions from using the carve out for nonprofits and public facilities in low-income or environmental justice communities (or receive any funds from this program) as they DO NOT improve living conditions, financial status, environmental and health status, and other social welfare indicators. They should NOT be categorized as critical service providers. Carceral actors, including police, prisons, immigration detention centers and jails seem to be categorically eligible for this funding and have already received it-- I do not believe that a program that seeks to reckon with Illinois complicity in the racial prison pipeline should provide assets or funding to institutions that were founded on, and continue to operate under, racist, classist and non trauma informed strategies. Be on the right side of history: disallow the use of ILSFA funds to institutions that need to do more before they receive any more money.

Best,

Pooja Ravindran

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**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** Use of Illinois Solar for All funds  
**Date:** Friday, October 7, 2022 10:34:28 AM

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Good morning,

I am writing to comment on the use of Illinois Solar for All funds. As a Chicago resident and non-profit professional with over a decade of experience, I fully oppose any funds for this work going to police stations, immigration detention centers, jails, and prisons. In my professional work as well as in my volunteer work in a mutual aid project, I have seen the absolutely devastating impact of state violence in the form of surveillance and incarceration on mainly Black and brown communities. These funds are supposed to be used to create healthy communities through renewable energy, and I completely applaud that principle. However, providing funds for death-making institutions to have solar energy is not aligned with your goals. We need to fund organizations and institutions that humanize people and get everyone the resources they need and deserve.

Thank you,

[REDACTED]  
she/her/hers

[REDACTED]

**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** Re: Illinois Solar for All Approved Vendor Manual Available for Responses Reminder  
**Date:** Thursday, October 6, 2022 8:45:40 PM

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Hello:

Here are my comments and suggested changes on the draft ILSFA Approved Vendor Manual v5.0 published September 20, 2022. All my page number references below refer to the clean version of the draft.

My disclaimers: I am writing only on behalf of myself and on behalf of no organization; I have not shared or discussed these comments with anyone; I am attempting to address only technical coherence; and I work with various environmentalist and/or renewable energy entities in my professional work.

Bottom of page 7: delete "Final" before "2022 Procurement Plan" (it wasn't "Final" when filed)

Same sentence on page 7: change "21-0717" to "22-0231"

Page 10, change "ILSA" to "ILSFA"

On page 17, in the sentence "An anchor tenant may be any rate-paying income-eligible residential household, a business, a non-profit organization, or a public entity." -- I think it was likely meant to say "**non**-income-eligible residential household" (similar to the sentence at the bottom of page 65).

Footnote 7 on page 17 says that a master-metered affordable housing building may be considered an income-eligible residential household if it passes on savings to residents; but if not, it could be an anchor tenant. That footnote 7 seems inconsistent with both (i) a statement on page 254 of the Final 2022 LTRRPP about a master-metered residential building serving as an anchor tenant only if it passes on savings to residents, and (ii) a sentence echoing the 2022 LTRRPP provision, two paragraphs down on the same page 17 of the Manual.

On page 39, it should refer to "2022 Plan" rather than "Revised Plan".

Page 41 (top): change "IECS sub-program" to "Community Solar sub-program"

Pages 47 and 56: it refers to a "less than 80% AMI" threshold for individual households. But elsewhere in the Manual, as well in IPAA § 1-56(b), it defines the threshold as **not exceeding** 80% AMI.

Page 61, footnote 22: change "Section 8.5.6.1 of the Revised Plan" to "Section 8.6.3 of the Revised Plan". [The relevant **change** that this sentence (first found as footnote 6 in the ILSFA Vendor Manual v3.0 dated June 17, 2020) is describing was in Section 8.6.3 of the Revised Plan approved in ICC Docket No. 19-0995, not in Section 8.5.6.1 of the 2022 LTRRPP approved in Docket 22-0231. See <https://ipa.aem-int.illinois.gov/content/dam/soi/en/web/ipa/documents/draft-revised-plansummer-2019/comparison-of-initial-plan-and-revised-plan.pdf>.] An *alternative* could be to delete this

footnote entirely, since the policy change is not news anymore.

Page 65: regarding the last sentence ("An anchor tenant ... would receive payment for RECs..."): I recommend inserting "The share of" at the start of that sentence. And in footnote 23 on page 66, I recommend inserting "the share of" before "non-profit or public facility anchor tenants could receive REC payments...".

Page 80: change "2002 Plan" to "2022 Plan"

Section 9 (Project Selection and Prioritization) of the Manual at pp. 93-96 seems to contemplate a single "waitlist" for each sub-program in a program year, while the draft Project Selection Protocol published September 1st ([https://www.illinoissfa.com/app/uploads/2022/09/ProjectSelectionProtocol\\_20220901.pdf](https://www.illinoissfa.com/app/uploads/2022/09/ProjectSelectionProtocol_20220901.pdf)) seems to contemplate **four** different waitlists (Environmental Justice Communities, Energy Sovereignty, Income Eligible, and General Selection) for each sub-program in a program year. Section 9 of the Manual could be clarified to be more consistent with the Project Selection Protocol.

Page 95, footnote 32: the phrase "Distributed Generation sub-program" should be changed to recognize one or both of the two new residential sub-programs.

On page 139, there's a footnote 53 in the main text, but then at the bottom of the page it shows footnote 34.

In the text of that same (mislabeled) footnote 34 on p. 139, it refers to a "Section 7.13.3" [presumably of the 2022 LTRRPP?]. But the 2022 LTRRPP (like prior LTRRPPs) doesn't have a Section 7.13.3; I'm not sure what was intended here. Also, the one instance of "Revised Plan" in this sentence should be changed to "2022 Plan".

Thank you,  
Sameer

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**From:** Illinois Solar for All <info@illinoissfa.com>

**Sent:** Wednesday, October 5, 2022 8:36 AM

**To:** Sameer Doshi

**Subject:** Illinois Solar for All Approved Vendor Manual Available for Responses Reminder

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**From:** [Sarah Bassett](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** Opposition of Illinois SFA for Jails, Prisons, Police Stations, and/or Immigration Detention Centers  
**Date:** Sunday, October 9, 2022 10:23:52 AM

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To Whom it May Concern -

I would like to submit my public comment in **opposition** of the possible use of Illinois Solar for All funds for projects at jails, prisons, police stations, and/or immigration/refugee detention centers. Instead, these funds should be used for institutions that support communities such as public schools or imbedded community-driven organizations.

Thank you,  
Sarah

**From:** [REDACTED]  
**To:** [Illinois Solar Comments](#)  
**Subject:** NO ILFSA funding to police  
**Date:** Friday, October 7, 2022 9:53:14 AM

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Dear Illinois Power Authority,

I strongly oppose Illinois Solar for All funding allocation for police or prisons. The program was conceived to benefit those who are most affected by the climate crisis and those that cannot afford to have a greener footprint. We already have a massively disproportionate amount of state funds going toward these carceral institutions, specifically the police, and we do not need to increase that even more. They are not critical services providers because they do not make our communities healthier or safer. Providing these funds to the police institution would undermine the very social justice basis this program was founded on. As an Illinois resident, I am appalled that this is even being considered.

Best,

[REDACTED]

Chicago, IL





October 7th, 2022

Trajectory Energy Partners, LLC  
P.O. Box 310  
Highland Park, IL 60035

**Re: ILSFA DRAFT Approved Vendor Manual Version 5.0 Comments**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the proposed 2022 ILSFA Approved Vendor Manual Version 5.0

Responses to specific questions:

***Energy Sovereignty***

• ***Community Solar:***

- *Section 4.3 Community Solar Project Eligibility has a list of requirements for how projects within the Community Solar sub-program can qualify as energy sovereignty projects for the purpose of the Project Selection Protocol under either an ownership model or cooperative model.*

*Are the contract types and specifications sufficient to capture the breadth of ownership models? Are there additional requirements that should be added to require a certain percentage of ownership shares beyond a majority (>50%) ownership threshold?*

Trajectory believes that the current proposed Approved Vendor manual does not capture the breadth of ownership models intended by the Climate and Equitable Jobs Act (CEJA).

Public Act 102-0662 Section 1-56(b)(2)(A)(i) requires the Agency to reserve “a portion” of Illinois Solar for All funding “for projects that promote energy sovereignty through ownership of projects by low-income households, **not-for-profit organizations providing services to low-income households**, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.”

We believe the law intended for ownership by any of the above outlined entities to meet the criteria of energy sovereignty. Specifically, non-profit organizations providing services to low-income households such as non-profit that own and manage low-income housing meet the intended definition.

The Long-Term Renewable Resources Procurement Plan (LTRRPP) Section 8.2.4 states:

The Agency believes that majority or full ownership by individuals **or community institutions listed by Section 1-56(b)(2)(A)(i)** is the most direct way to ensure that local people will have control over and reap the benefits from photovoltaic energy projects. The Agency originally proposed to define “energy sovereignty” as the eligible low-income household or community



organization having or being on a defined path to majority or full ownership of the photovoltaic facility. After consideration of stakeholder comments and per the Commission’s Order approving this Plan, the Agency adopts the following definition of “energy sovereignty” for the Illinois Solar for All program:

“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.

The LTRRPP also makes clear that ownership by a community organization of the types listed in Section 1-56(b)(2)(A)(i) of CEJA meet the definition of energy sovereignty.

Trajectory proposes adding a 3rd model for energy sovereignty for an ILSFA Community Solar project in the ILSFA Approved Vendor Manual Version 5.0:

### **Ownership by a Qualifying Community Organization**

To meet the criteria of the Ownership by a Qualifying Community Organization model, a community solar project would need to meet the following criteria:

- Project includes a plan for 100% ownership within 7 years by a community organization that meets the criteria listed in Section 1-56(b)(2)(A)(i) of CEJA
- The Community Organization should serve as the anchor subscriber to the project.
- Residential low-income subscribers to the project should be clients or members of the organization.
- The Community Organization should detail how additional benefits beyond the required community solar subscription savings will be shared with its members or low-income clients of the organization.



### 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
  
- For Ownership by Qualifying Community Organization model:
  - Lease or PPA contract between Approved Vendor and Qualifying Community Organization guaranteeing ownership of the community solar system by the organization within the first 7 years of energization.
  - Contract detailing the cost and timing of transfer of ownership of the community solar system, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance.
  - Contract providing details on financial benefits beyond electricity cost savings to low-income clients or members of the organization.
  - Subscription plan showing that the Qualifying Community Organization can serve as at least a 10% anchor subscriber to the project, and that its members or clients can serve as the low-income residential subscribers to the project.



Respectfully submitted,

Jon Carson  
Managing Partner  
Trajectory Energy Partners, LLC  
P.O. Box 310  
Highland Park, IL 60035  
[jcarson@trajectoryenergy.com](mailto:jcarson@trajectoryenergy.com)

**From:** [Wade Halva](#)  
**To:** [Illinois Solar Comments](#)  
**Subject:** Items defined as income  
**Date:** Tuesday, September 27, 2022 3:53:11 PM

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I think I'd like to address 2 items that are covered as income for ILSFA.

I do not believe that the following items should be considered as income for ILSFA :  
Educational Stipends, and Federal Black Lung Benefits.

We have long lauded education as a way to move up in the world, to better one's self, and to climb out of poverty. It seems odd that an educational stipend could potentially remove someone from qualifying for an income eligible program such as ILSFA. Depending on the exact meaning of the term, this could end up disqualifying students with grants or scholarships from this program. Rather than make people choose between education and ILSFA, let's allow them to have both. I propose removing the educational stipends from the category of "other income" and instead categorized below as educational funds that do not count as income.

Federal Black Lung Benefits can take the form of cash payments and/or medical benefits. The medical benefits may vary greatly in value and would be hard to quantify. I would suggest changing the language to reflect the "monthly payments of the Federal Black Lunch Benefits Act." I would also suggest that in general income be limited to cash or monetary considerations when listed.

Thanks,  
Wade

[signature\\_545618930](#)



### **Rev. Wade Halva (He/him)**

Southern Illinois Outreach  
Coordinator | Faith in Place  
*IL, IN, & WI Affiliate of Interfaith Power & Light*

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