

To: The Illinois Power Agency
From: Kim Knowles and Members of the Illinois Solar for All Working Group
Date: February 17, 2023
Re: IL Solar for All Residential Pilot Program

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 Requests for Comments on the Residential Solar Pilot.

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.

We make these recommendations and comments to ensure high-quality implementation for Illinois communities. Communities throughout Illinois need the opportunities and services the Illinois Solar for All Program will provide and the support of groups with substantive experience in the solar industry and low-income solar in particular. Please do not hesitate to contact us with questions or comments.

For these comments, specific signatories include:

A Just Harvest	Vote Solar
Futurez NFP, Incorporated	Illinois Environmental Council
Citizens Utility Board of Illinois	Central IL Healthy Community Alliance
SustainRockford	Illinois People's Action
Seven Generations Ahead	Central Road Energy LLC

1. The pilot design includes changes to the program delivery and the interaction of the Program Administrator and the Approved Vendors in the community areas. Those roles are proposed as follows: *Should any of the described roles for the ILSFA Program Administrator remain with the Approved Vendor? Are there any other duties that should move to the Program Administrator that aren't specified here? What other program design aspects are missing that may improve the Residential Solar (Small) subprogram within ILSFA?*

We note that in the Program overview, the administrator identifies several barriers impacting prospective participants and Approved Vendors, including a complex administrative process. While the proposed pilot would certainly decrease the complexity of customer acquisition for AVs, we remain concerned about internal project review and application portal issues that are slowing the review of applications down. Perhaps additional staff are needed as we anticipate an exponential growth in project submissions in the very near future, as well as continued streamlining of the review process

It might benefit the overall program to have Program Administrator staff following these projects throughout the process. The Approved Vendor would submit the bulk of the projects to the ILSFA program portal, but perhaps designated staff could attempt to submit a handful of the projects they helped originate to help identify opportunities for a smoother project submission process.

2. The Agency will adjust the Renewable Energy Credit (REC) price to recognize the lower cost to Approved Vendors resulting from the Program Administrator taking on many of the participant acquisition responsibilities. The current REC Pricing Model includes a 100% increase in development costs and fees for Residential Solar (Small) projects in ILSFA compared to the Adjustable Block Program. *Given the proposed program design, how should the prices be adjusted (for example, reducing the adjustment from 100% to 50%).*

If REC prices in ILSFA factor in 100% higher development costs than in the ABP residential programs, IPA should attempt to tease out what portion of development costs are represented by the duties to be assumed by the program administrator. Based on the way duties are apportioned in the table under question 1, we believe the program administrator might be assuming somewhere under 20% of the overall cost since the majority of those duties reach multiple participants at once (marketing, recruitment events, coordination with job training and placement program and energy efficiency efforts) or can be done virtually using a repeatable process (income verification and initial site suitability assessment).

The bulk of development costs are still being borne by the approved vendor – one-on-one interactions with participants, on-site assessment, design work, and Part I and Part II applications. This work is more costly due to its nature and factoring in scheduling, travel and technical expertise. We have heard from AVs that a large driver of costs is the need for repeated interactions with potential customers due to failures to respond, canceled appointments,

changing minds, lack of trust, etc. This need will continue to fall on the AV under the pilot program. As such, we recommend continued use of the 100% increase in development costs and fees when determining REC prices for the downstate pilot, and an 80% increase for the other two pilots.

3. Are there any additional community selection criteria to consider, as a category or as a subcategory? Are there any criteria that should be adjusted or removed from consideration?

We understand the tension here between wanting to choose locations with demonstrated interest in the ILSFA program, the Illinois Shines program, and in energy efficiency programs with the hope of increasing uptake in the pilot, and wanting to serve underserved areas. Nevertheless, we think it is important to pilot in an area that is not currently being served by AVs in order to determine whether additional administrative support could cure this problem. To that end, we recommend cutting the points awarded for Community Experience & Visibility to a max of 10, and adding a category such as, "Underserved Areas," that awards up to 10 points for downstate population centers that have seen no ILSFA activity to date.

In order to award the "Underserved" points, we suggest analyzing the past program years to determine the total ILSFA money awarded within each of the community areas under consideration. Divide those results into quartiles and then award points. For example, zero points for the highest quartile, two points for the second highest, four for third highest, and eight points for the lowest quartile. Ten points can be awarded to the community areas that have received no previous ILSfA dollars.

4. Are there any communities that should be added or removed from the current list? If so, why?

We think it wise for the Administrator to speak with Sunrun regarding the large number of projects they have stated are in their own queue to help determine a list of prospective communities. Xolar has an internal queue that should be considered as well. We have concerns about proceeding with this pilot without first considering what projects AVs have in their queues, particularly Sunrun.

The original intent of this pilot program was to catalyze uptake in a severely underutilized program. If that is no longer the primary concern, the focus of this pilot should shift towards other program priorities, such as supporting small and emerging contractors and increasing participation in areas that have not yet seen ILSFA residential projects.

We think it important to consider that the three identified regions will have different needs and barriers and that the pilots needn't be the same but that each pilot should be designed to address the particular barriers of a region so that more information can be gained. For instance, addressing the complete lack of residential projects downstate of central Illinois will likely require

different solutions than those required to address the lack of service or underservice in certain City of Chicago and suburban communities. The Chicago-specific pilot might also focus more on supporting small and emerging contractors, whereas the downstate pilot could offer a higher REC price given the increased costs of travel not only to a downstate community but between the selected projects.

5. Is “county” the correct geographic area that should define “down-state community” or should the Program Team consider multiple counties or regions?

Regarding downstate communities, we believe that county is not the proper geographic area for defining a downstate community. For example, Williamson/Jackson are the same community in many ways including housing and workforce options for residents. A node approach would work better, such as Madison/St. Clair Counties, given the shared history and developments that have occurred there. Designating downstate areas using the Metropolitan and Micropolitan Statistical areas might be more appropriate, as this method acknowledges how communities actually function regardless of the lines on a map.¹ Neighboring counties in downstate Illinois may make up a large geographical area, but the reality is that local community members might not find these places very far apart. For instance, people commonly drive around the Jackson/Wilamson/Johnson County area for work, groceries, kids’ events, and socializing.

Given the reality of dispersed populations in downstate Illinois, particularly south of central Illinois, we think a higher REC price should be considered for the downstate pilot, as noted in our response to Question #2 above.

6. Are there any criteria that should be added, adjusted, or removed from consideration in the Approved Vendor RFP?

IPA should be looking for AVs that have established relationships with trusted messengers to carry the program into the community. We understand that in the energy efficiency industry, there is a perception that offers for no or low cost programs are “too good to be true.” Using a community partner that is a trusted messenger will be an important element of success. Some of the grassroots educators will be better suited for this role than others, and some trusted organizations might not be grassroots educators.

To this end we recommend the following edits:

Commitment to the Community & Participants. Community involvement and experience in the community, particularly experience working with income-eligible and/or environmental justice communities; ability to provide support and resources for ineligible participants; **demonstration of working with a trusted community messenger;**

1

[https://en.wikipedia.org/wiki/Metropolitan_statistical_area#/media/File:Metropolitan_and_Micropolitan_Statistical_Areas_\(CBSAs\)_of_the_United_States_and_Puerto_Rico,_Mar_2020.png](https://en.wikipedia.org/wiki/Metropolitan_statistical_area#/media/File:Metropolitan_and_Micropolitan_Statistical_Areas_(CBSAs)_of_the_United_States_and_Puerto_Rico,_Mar_2020.png)

commitment to following consumer protection handbook and examples of customer service. 30 points

Finally, any selected AV should be required to provide a reasonable plan for using the pilot as a launching pad for additional and continuing work in the area.

Stakeholder Feedback | City of Carbondale, IL

Lauren Becker

Wed 2/15/2023 9:26 AM

To: Illinois Solar Comments <comments@illinoissfa.com>

Answers to Questions for Stakeholder Feedback:

1. No additional comment
2. No additional comment
3. "Proximity to a CEJA workforce hub" would be a great addition. As would "identifies as a recovering coal community" (perhaps tie this to distance from a retired coal fired power plant or mine).
4. I support wholeheartedly the selection of Jackson County IL as a site for the residential pilot. I was surprised when I moved to Southern IL to learn that there are zero ILSFA approved and/or recognized energized residential solar projects in our region. It is my hope that ILSFA will consider the community of Carbondale, IL as a site for the residential pilot given our position as a community of persistent poverty, our demonstrated hunger for distributed renewable energy generation, our history as a recovering coal community, and our strong not-for-profit network of collaboration, education, and programming. Although we sit at 26.6% owner-occupied housing according to the last Census, our municipality is committed to strengthening housing stock and our community members' ability to become homeowners. In FY 23 alone, the city dispersed a total of \$190,258.66 in grant funds to support down payment assistance for first time homebuyers, conversion of rentals to single-family homes, and curb appeal improvements. I believe that this housing grant program demonstration speaks to our community's ability to engage with and support a residential ILSFA pilot program.
5. No additional comment
6. No additional comment

Thank you for your time and consideration.

Warmly,
Lauren

Residential Solar Pilot Proposal - Response

Senora Colbert

Wed 2/15/2023 5:00 PM

To: Illinois Solar Comments <comments@illinoissfa.com>

Hello Program Team,

Listed below are my responses to the Residential Solar Pilot:

1. I agree with the described roles of the ILSFA and PA with one exception. The initial site suitability assessment should remain with the vendor based on my own personal experience. The approved vendor should have extensive knowledge regarding all pertinent details of property. Knowing from past experience what worked and what did not.
2. REC - Renewable Energy Credit - No comment
3. The table is a good start. Placing priority for families of low-income, and/or from an EJ communities that could really benefit from ILSFA. Organizations advocacy and support should be retained. Perspective participants will acknowledge and listen to a CBO that they are familiar with. People go with who they know, trust, and provide them with a certain comfort level.
4. We can always add more communities as we learn of them.
5. The Program Team should consider multiple counties and/or regions.
6. The table representing the proposed scoring criteria for Approved Vendor RFP submission looks and sounds great! However, under the category - Plan to Employ Job Trainees, the selection score should hold more value, promoting a more serious commitment to recruitment. I believe that it would be advantageous to the vendor to diligently recruit a moderate percentage of trainees that are of low income and who live in or near an EJ community.