

02.28.2023

Response to Comments: Residential Solar Pilot

Overview and Response Summary

The Program Administrator and the Illinois Power Agency (the “Program Team”) published the proposed Residential Solar Pilot (the “Pilot”) on February 2, 2023, with a Request for Comments due on February 15, 2023. Three parties submitted written comments. The Program Team has considered these written comments and is appreciative of the thoughtful input they provided. The updated Pilot proposal is available here, and the full comments on the proposal are posted here.

Comments have been summarized and addressed by the following topics: Role of the Program Administrator and the Approved Vendors, Pilot REC price, Pilot Community Areas, Approved Vendor Request for Proposal Criteria, and Additional Comments

Role of the Program Administrator and the Approved Vendors

- *One commenter recommended the Program Administrator staff follow these projects throughout the process to address the barrier of a complex administrative process.*
- *One commenter recommended the site suitability assessment remain with the Approved Vendor, so they have extensive knowledge regarding the property.*

The Program Administrator will provide support and guidance to both the customer and the Approved Vendor throughout the entire project application process, following the Illinois Commerce Commission’s Final Order approving the 2022 Long-Term Plan.

Additionally, the Program Team recommends the initial site suitability assessment remain with the Program Administrator to provide a pipeline of homes for assessment to Approved Vendors following income verification. This initial site suitability assessment is meant to assess the basic needs for a solar installation and will still require a thorough investigation by the Approved Vendor before moving forward with the installation. Because of this, the Program Team believes the Approved Vendor will maintain an extensive knowledge regarding the property, addressing the latter commenters concern.

Pilot REC Price

- *One commenter recommended continued use of the 100% increase in development costs and fees when determining REC prices for the downstate community and an 80% increase for the other two community areas in the northern region of the state. These percentages approximate the Program Administrator will take on about 20% of the costs in the proposed Pilot, while the Approved Vendor is still facing the bulk of the development costs.*

The Program Team has considered the comment to create two separate REC prices in the Pilot, one for the northern Illinois community area and another for the central and southern Illinois community area. Following the 2022 Long-Term Plan, the REC price for the Pilot will be adjusted to recognize the Program Administrator taking on some of the soft costs from the Approved Vendor participating in the Pilot. However, they recognize this still leaves the bulk of the development costs on the vendor, especially when working in a larger community area in the central and southern regions of Illinois. Given this background, the Program Team will adjust the REC price for the central and southern Pilot community area to a 95% increase. The Program Team will adjust the REC price for the two Pilot communities in the northern Illinois region to an 80% increase.

Pilot Community Areas

COMMUNITY SELECTION CRITERIA

- *One commenter recommended cutting the points for Community Experience & Visibility to a maximum of 10 points and to add a category of “underserved areas” representing areas that have received no ILSFA money awarded within each community area.*
- *One commenter recommended adding a category for “proximity to a CEJA workforce hub” and a category for “identifies as a recovering coal community”.*

The Program Team agrees with the commenter that the scoring rubric should include points for areas that have been underserved by Illinois Solar for All. The scoring category for Community Experience and Visibility of Energy Projects was intended to prioritize areas where residents have seen solar projects in place and might be more amenable to participating. Additionally, installed projects would indicate the availability of labor and other logistic requirements. However, while the Project Team wants to design the pilot in a way that provides the best circumstances for increasing Residential Solar (Small) participation, it also recognizes that the purpose of the Pilot is to facilitate participation by those that faced barriers previously. Thus, the Project Team will split this category into two: the original category (adjusted to only award points for NP/PF and Large DG projects, not small residential projects, to align with that participation objective), and the proposed category awarding points for “Underserved” communities. Both categories will award up to 10 points, with the Underserved category providing the most points for communities that have not had any Residential Solar (Small) projects.

The Program Team will add “proximity to a CEJA workforce hub” and “distance from a retired coal-fired power plant or mine” as criteria under the category “Community, Resident, and/or organization support”.

PROPOSED LIST OF COMMUNITIES

- *One commenter recommended considering the small residential projects current Approved Vendors have in their queue for submission to select communities that remain underserved in the Residential Solar (Small) sub-program.*

The Program Team will consider the Residential Solar (Small) projects that may have been submitted during this Program Year 5 and will adjust the community list accordingly to reflect areas that remain underserved in this sub-program.

DEFINING THE THIRD PILOT AREA

- *One commenter recommended using the Metropolitan and Micropolitan Statistical areas defined by the Census Bureau to acknowledge how the communities function, regardless of lines on a map.*

The Program Team understands many residents of the counties in the central and southern regions of Illinois often travel across county lines for many reasons. Therefore, the Program Team will select the central and southern community area through the suggested node approach using the Metropolitan and Micropolitan Statistical areas defined by the Census Bureau.

Approved Vendor Request for Proposal Criteria

- *One commenter recommended including a prompt for “demonstration of working with a trusted community messenger” under the criteria “Commitment to the Community & Participants.” They also commented that the Approved Vendor should provide a reasonable plan for using the Pilot to continue work in the area following the Pilot.*

The Program Team has considered the commenter’s position and will update the Request for Proposal to include an optional question to ask if the Approved Vendor has built trust in the communities the campaign intends to serve, and if so, how did they build that trust. To ensure that no actual or perceived conflict of interest occurs, ILSFA Grassroots Educators are required to work with all Approved Vendors working in the communities the vendors serve, therefore, no preference will be given to Approved Vendors working with ILSFA grassroots educators.

Additionally, the Program Team believes the additional question for the vendor’s plan to continue work in the Pilot area following the Pilot program is a worthwhile suggestion to ensure these vendors are both continuing their involvement in ILSFA and their involvement with that community area.