

Request for Comments: Illinois Solar for All Home Repairs and Upgrades Pilot

05.10.2023

The Illinois Solar for All (“ILSFA”) Program Administrator and the Illinois Power Agency (the “Agency” or “IPA”) (collectively, the “Program Team”) are requesting feedback from stakeholders and other interested parties on the Home Repairs and Upgrades Pilot (“Pilot”).

BACKGROUND: Several ILSFA Approved Vendors and stakeholders have observed that the need for home repairs and electric upgrades is a barrier that has prevented numerous income-eligible customers from participating in ILSFA. Suitable roof and electrical conditions are necessary to fully support onsite rooftop or ground-mounted solar, but income-eligible households may lack the resources to invest in these prerequisites for site suitability. Section 8.5.3.3 of the Illinois Power Agency’s 2022 Long-Term Renewable Resources Procurement Plan (the “2022 Long-Term Plan”) creates a pilot initiative titled “Pilot Program on Home Repairs and Upgrades” to provide additional incentives to help complete the necessary repairs to install solar on income-eligible homes. The Program Administrator has developed this Pilot to reduce the barriers for owner-occupied income-eligible households to participate in the Residential Solar (Small) sub-program.

The Program Team is seeking feedback on the design of this proposed Pilot and information in response to the specific questions below. Commenters are not required to respond to every question and may provide feedback on other elements of the proposal. Comments are welcome from both stakeholders in ILSFA and other interested parties.

Please note that comments will be made public and published on the ILSFA website (IllinoisSFA.com). However, if a commenter seeks to designate any portion of its response as confidential, that commenter must provide both a non-public confidential version and a public redacted version. Independent of that designation, if the Program Team determines that a response contains confidential information that should not be disclosed, it reserves the right to add its own redactions to the public version.

The draft Home Repairs and Upgrades Pilot Proposal is posted at IllinoisSFA.com/Announcements.

Responses are due **by Wednesday, May 24, 2023**, and should be sent to the Program Administrator at comments@IllinoisSFA.com.

Questions for Stakeholder Feedback

1. The Program Team is proposing two categories of expected cost caps for electrical repairs and roof repairs. The proposed cost caps are \$4,000 for electrical upgrade costs and \$8,000 for roof repair costs.
 - a. **Should the Program Team use these two categories of expected maximum costs for the Pilot? Why or why not?**
 - b. **Should the cost caps be adjusted for either of the two categories? If yes, what should they be adjusted to, and what is your basis for recommending this adjustment?**
 - c. **Should Pilot-participating projects be allowed to access funds to support both roof and electrical upgrades, maintaining the electrical and roof repair caps for a total possible additional incentive of \$12,000, or should Pilot projects only access additional incentives to support either electrical or roof repair costs, which could potentially extend availability of funding to reach additional participants?**

2. This Pilot will provide incentives to support electrical and roof repairs necessary to complete an on-site solar installation. Types of repairs eligible under this Pilot will be predetermined and approved by the Program Team. Eligible repairs are reflected on the Home Repairs and Upgrades Reference List document, including a maximum cost for each repair type allowed under the Pilot. This list is not exhaustive and will not cover all electrical and roofing repair needs of a home.
 - a. **Are there electrical or roof repair items necessary to complete an on-site solar installation that should be included in the Reference List as eligible for funding under this Pilot? If yes, which repairs should be included and why?**
 - b. **Are there maximum costs for electrical or roof repair items in the Reference List that should be adjusted? If yes, what should they be adjusted to, and what is your basis for recommending this adjustment?**

3. The Program Team expects work funded through this Pilot to adhere to high professional standards and include adequate warranty coverage for the work to protect the consumers benefiting from the repairs. The Program Team has proposed a minimum warranty period of 10 years for electrical repairs or panel upgrades and 20 years for roof repairs for projects receiving Pilot funding.
 - a. **What minimum warranty coverages and durations should be required for electrical repairs?**

b. What minimum warranty coverages and durations should be required for roofing repairs?

4. The Program Team has proposed the following minimum insurance requirements for contractor eligibility:

- Workers Compensation Insurance – following Illinois statutory limits
- Commercial General Liability - \$1,000,000 per occurrence/\$2,000,000 in the aggregate
- Auto Liability Insurance for owned, non-owned, and hired vehicles - \$1,000,000 per occurrence/\$2,000,000 in the aggregate

Should the Program Team adjust the above minimum required insurance coverage for a contractor to participate in this Pilot? Why or why not?

5. This Pilot will require additional consumer protections to minimize the risk to participants interacting with the Approved Vendors and contractors. The Program Team has proposed the Approved Vendor or contractor provide an installation schedule to participants illustrating on-site workdays, maintaining timely communications with the homeowner when there are updates to the repair timeline and a requirement for the Approved Vendor to provide the homeowner with all documentation, warranty, and contact information following the repairs.

Are there additional consumer protections that should be included in this Pilot?