

ILLUME

Responses to Comments: Illinois Solar for All Program Evaluation Webinar and Evaluation Plan

DATE: November 15, 2023

Overview

The Illinois Solar for All (ILSFA) program is required to undergo rigorous evaluation to measure program impacts and identify opportunities for improvement. The ILSFA independent evaluator, ILLUME Advising (ILLUME), hosted a webinar on October 31, 2023 to gather feedback for the 2021-2022 Program Year and 2022-2023 Program Year evaluation reports.

During the webinar, ILLUME shared research questions and planned research activities. They also outlined the metrics the evaluation will measure to characterize program performance and identify opportunities for improvement to meet the goals of the evaluation. Discovery interviews with ILSFA stakeholders¹ and the Program Administrator² informed ILLUME's plan development.

¹ To identify contacts for stakeholder interviews, ILLUME made an announcement on IPA's website requesting feedback from interested stakeholders. ILLUME completed ten 45-minute interviews. Interviewees included approved vendors, solar installers not participating in the program, members of the ILSFA advisory committee, grassroots educators, and community-based organizations.

² For the program administrator interviews, ILLUME conducted six hour-long interviews with Illinois Power Agency (IPA) and Elevate staff managing the Solar for All program.

Stakeholder Comment and Response

We received one comment (received via email). Below, we document both the comment and ILLUME's response.

I have several areas that I would like to comment on for the Annual Report Evaluation Plan. I am commenting as a far downstate grassroots educator with Faith in Place, notably the only Grassroots educator south of I-64 outside of the Metro East (St Louis) area. It is notable to note that until FY05 there were no projects awarded in this part of the state and that the ones that have been awarded are public schools, which are no longer part of the program.

2.a – Participatory Evaluation Planning

These are on target. I would add that part of the wariness of the program can be ascribed to the lack of a presence of grassroots educators or approved vendors throughout the whole of the state. A dominant number of both of those categories are in Chicago, which is appropriate based on population, but fails to take into account the amount of space and number of different communities that need to be covered in downstate to reach the disparate populations. Smaller communities gather in different ways and need to travel outside their community for essential services and have a different level of critical mass. Often the smaller communities may not have a large enough economic base for an AV to serve, and then travel to those communities to do work on smaller projects becomes financially unviable, and that results in smaller projects in smaller communities not happening.

Smaller communities having less access to AV's also addresses part of the reason for low small residential uptake. The cost of bearing the residential projects over the term of the contract is often prohibitive to smaller installers who cannot afford to carry the cost of the project at the guidelines for the term of the contracts.

Social Impact Analysis

There needs to be a serious reevaluation of the methodology for determining eligible communities on both the income eligible and the environmental justice maps.

Currently the model limits the automated definition of EJ communities to the 25% most impacted communities. That is only a relative and arbitrary line, and ends up with communities being placed in competition against each other and is a disincentive for them to work on bettering their communities if doing so would remove them from the ILSFA EJ maps, especially since it appears that those maps are going to form the basis for other state funds centered around environmental justice. Communities just outside the automatically selected range may not have the capacity to complete the self-designation process. While some communities may be outside the 25% when compared against Illinois, they are often inside that percentile on the national scale. If these communities are in the 25% most impacted communities in the nation, then certainly they should be considered EJ communities in the state of Illinois.

The impact of environmental injustice lasts for decades and generations, but the standing of a community as an EJ community as designed by the IPA can change overnight. There is a fundamental disconnect in the way these changes are being made versus the realities of environmental injustice as it plays out in the communities impacted. Status as an EJ community should include some calculation of the length of time of the damage or

impacts to the communities in question. For instance the Koppers Creosote plant functioned in Carbondale from 1902 to 1992, but cleanup only began in 2004:

<https://www.explorecarbondale.com/DocumentCenter/View/5669/2020-10-14-EPA-and-Beazer-East-begin-soil-cleanup-at-former-Koppers-Wood-PDF>. The impact of that pollution on the community, notable the African-American community in NE Carbondale has not been abated in its entirety and the impacts of that plant have impacted generations of the community, but the work to remediate or provide justice has been going for less than 20 years. This is true in E St Louis, in Cairo, and in all of the communities that have been defined as EJ communities.

The change in the PY07 maps results in there being no EJ communities south of Springfield and outside of the Metro East area, which does not align with the lived experience in those communities nor the shared understanding of those communities.

The income eligibility maps suffer from similar issues. Communities do not suddenly have an increase in average income out of nowhere. In the southern reaches of the state, populations are shrinking, and many of the lowest income residents are being forced out by HUD housing being destroyed. That raises the average income in the community but doesn't say anything about the actual financial health of the residents.

I have issues with these maps as my work is largely with not for profits, house of worship, and their eligibility depends on being in one of these mapped areas. Regardless of who they serve, they have to be located in one of these areas. This mapping system neglects the area of service for not for profits and only relies on the physical location of the building. Since not for profits are required to submit letters of community support, it would seem that the placement of the building should be less significant than the status of the people and community served.

At the present time, I would dispute the title of the program as Illinois Solar for All. The vast majority of the programs are from north of I-70. There need to be adjustments made if the program is going to reach rural and small community residents and meet its stated goal of bridging the clean energy gap.

Evaluator Response:

ILLUME appreciates the context provided in this comment and believes these insights are pertinent to the evaluation overall, but also to two specific tasks currently underway.

The first task is the mid-year report focused on characterizing barriers household and approved vendor participation in the Residential Solar (Small) subprogram. The key research questions addressed in this report include:

- What are opportunities to generate greater interest in the Residential Solar (Small) Subprogram?
- What are barriers to entry and participation for small installers in the program?
- How might we increase the geographic reach of the program?

Research activities for this report include interviews with five ILSFA participating vendors, interviews with three Adjustable Block Program (ABP) vendors not participating in ILSFA, demographic research and market analysis, program administrator interviews, tracking data review, and a review of program processes.

The context provided on this subprogram in the commenters input on “Participatory Evaluation Planning” is aligned with feedback received from the program administrators and through interviews with approved vendors participating and not participating in ILSFA. The report will provide recommendations to IPA to address these barriers.

The second evaluation activity pertaining to the stakeholder’s comment is the social impacts analysis. ILLUME Advising appreciates the context shared in this comment with regards to the income eligible and environmental justice community maps and how these impact downstate participation in the non-profit and public facility subprogram. The mapping methodology selected for our social impacts analysis aims to identify how current participation overlays EJC and other state and federal criteria. Based on how projects overlay, our team may recommend adjustments to criteria for IPA to consider in future program years. We will complete our analysis with the context provided through this comment in mind.