

# Response to Comments: Illinois Solar for All Approved Vendor Manual

## Overview

The Illinois Solar for All Program Team has reviewed the feedback from stakeholders and other interested parties on the proposed changes to the Approved Vendor Manual for the 2024-2025 Program Year.

A request for feedback on the proposed changes to the Approved Vendor Manual was issued on April 5, 2024, with public comments due on April 17, 2024. One party submitted [written comments](#). The Program Team has considered these written comments and appreciates the thoughtful input provided by the commenter. Comments have been summarized and addressed below.

# Stakeholder Comments and Responses

## FEEDBACK #1:

*Pg 27 - "Because the net metering bill credit for such subscribers will be the utility Price to Compare (PTC), costs/savings will be based on that net metering value."*

As noted in the "Connector" discussion just below the above quote:

"According to the 2022 Long Term Plan, and as outlined above in Section 2.3, ILSFA Community Solar projects approved in the 2023–2024 Program Year and beyond will be required to utilize a single-billing option offered by utilities so the customer subscription charges are billed through the customer's utility account."

The PTC and the traditional subscriber contracting models appear moot with the new single billing option. As described in the LTRRPP, for the single billing option, the utility will "include a subscriber's subscription fee on the subscriber's monthly electric bill and provide the subscriber with a net credit equivalent to the total bill credit value for that generation period minus the subscription fee, provided the subscription fee is structured as a fixed percentage of bill credit value."

This implies that the ILSfA CS project owner will only be allowed to set a percent discount (i.e., 50% or greater) for their subscribers. That is, a CS project owner can no longer utilize a rate based on the PTC. This appears to eliminate traditional PPAs and lease agreements and their associated escalators from consideration as a business model. If we are correct, the requirements for savings based on PTC can be struck.

We also request that the program clarify how PY6 CS projects that sign up subscribers prior to the availability of the single-billing option are to proceed with new subscribers when the single-billing option becomes available. Can they be signed to PPAs or leases or will they be required to utilize the single-billing option and thus the resulting fixed percentage of bill credit value?

## RESPONSE #1:

Ameren's billing system was updated to handle the single-billing option starting in December 2023. ComEd's billing system was replaced in February 2024. The 2024 Long Term Renewable Resources Procurement Plan (the 2024 Long-Term Plan) does recognize that the single bill billing option is still in the early stages.

"As utility implementation of a single-billing option is still in its early stages, the draft 2024 Long-Term Plan proposes to maintain this requirement for ILSFA Community Solar and will continue to monitor implementation of single-billing with ILSFA Approved

Vendors. If the Agency witnesses a significant decline in project applications, it will request stakeholder feedback on making the single-bill net crediting requirement optional."

The requirement to use the utilities' single bill option is still there, and the utilities' requirement for that is that the fee must be a percent of billing credit, which leads to the percent of utility bill credit being the only subscription model that is usable. A change has been made to the Approved Vendor Manual in footnote 13.

## **FEEDBACK #2 :**

*Pg 33 - Elimination of the AV aggregator as a recognized Approved Vendor type*

*Pg 39 - As of PY7, entities are no longer permitted to register as an "Aggregator". The subtype "Aggregator" is now consolidated into the general Approved Vendor designation. Any entity who would have previously registered as an "Aggregator", must now register as an Approved Vendor. The entity will be permitted to work with designees but will now be required to submit a community engagement plan. The community engagement plan may describe the community engagement of the Approved Vendor's Designees.*

Why has the AVA been eliminated from the list of approved vendor types? We believe that Central Road Energy provides a valuable service to the program as an aggregator. By not being specific, it does a disservice to the consumer as it equates the role of an aggregator with that of an Approved Vendor. We think Illinois Shines should update their entity type terminology to better describe the different roles companies take in these projects.

Furthermore, why retroactively implement a requirement for a community engagement plan for existing AVAs? Aggregators do not engage with the public. By the same logic, why not eliminate the subcontractor designation and have subcontractors submit the community engagement plans of the AVDs that they work under?

## **RESPONSE #2 :**

The change to consolidate Aggregator into the general Approved Vendor type was made for consistency with Illinois Shines' classifications. Aggregators and Approved Vendors have had more similarities than differences, with the previous exception of intentionally working with Designees. The similarities include being the contractual counterparty with the buyer, ongoing reporting requirements, and downstream coordination partnering organizations (e.g., installers/developers/subcontractors).

The Approved Vendor Manual will maintain Approved Vendor and Designee as the two types of Vendors approved to work with ILSFA. However, Approved Vendor registration

will now encompass a general Approved Vendor type with an Approved Vendor Aggregator subtype in one application. An Approved Vendor who is registered as an Approved Vendor Aggregator rather than a general Approved Vendor will not be required to submit a standalone community engagement plan but will be required to submit a community engagement plan through their Designee. If an Approved Vendor Aggregator changes its designation from Approved Vendor Aggregator to general Approved Vendor, then it will need to resubmit an application for registration to appropriately reflect its role in the program and will need to submit a community engagement plan.

### **FEEDBACK #3:**

*Pg 168 - Existing employees that complete a Qualified Job Training Program in an effort to meet the job training requirements are not considered Eligible Trainees.*

We support this requirement. However, we feel some additional clarification should be included. For example:

- The requirement specifies only “employees that complete a Qualified Job Training Program”. Will existing employees that complete training through an Other Qualifying Program (OQP) be considered Eligible Trainees (ETs)? We have heard that existing employees are taking training through the OQPs to qualify as ETs.
- If an existing employee was trained through an Other Qualifying Program and became an ET in PY6, would they be allowed to complete their two years of eligibility, or can their hours no longer be counted towards the ET requirement?

We think the program should allow for approval of existing employees being trained and qualifying as ETs under certain circumstances. For example, it may behoove an employer to hire someone who qualifies for ET training and pay them while they go through the training. This example does not circumvent the spirit of the program and should be allowed if a written request from the employer is approved by the Program Administrator.

We also suggest that the Job Training Project Summary Affidavit be modified to include an attestation that the ETs were not hired prior to the beginning of their qualifying training unless approved prior to training by the program.

### **RESPONSE #3:**

Other Qualifying Programs (OQPs) fall under Qualified Job Training Programs so existing employees that complete training through an OQP would also not be considered an Eligible Job Trainee. For all Eligible Job Trainees, regardless of the type of Qualified Job Training Program, the timeframe where hours can count toward meeting ILSFA job training requirements is within 48 months of completing the Qualified Job Training

Program. The Program Administrator will update the Project Summary Affidavit to include an attestation that staff were not hired before becoming an ET.

From the IPA Act, 1-56: "Companies participating in this program that install solar panels shall commit to hiring job trainees for a portion of their low-income installations", therefore no circumstances will be made for existing employees that complete a Qualified job Training Program be considered an Eligible Job Trainee.

The Program Administrator does not approve this change, will not make an exception for existing employees to become Eligible Trainees, and this will not be updated in the AV Manual.

#### **FEEDBACK #4 :**

*Pg 161 - Section 14.3 Photo Documentation*

#### **ELECTRICAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION**

<p><b>INVERTERS<sup>68</sup></b></p> <ul style="list-style-type: none"> <li>✓ Inverter Information (one photo for each model, must show model number)</li> <li>✓ DC Disconnect (one photo must show wiring within enclosure, either within inverter or isolated)</li> <li>✓ DC Combiner Box (one photo, must show wiring within enclosure behind panel)</li> <li>✓ AC Combiner Panel (one photo, must show wiring within enclosure behind panel)</li> </ul>	<p><b>OTHER ELECTRONICS<sup>69</sup></b></p> <ul style="list-style-type: none"> <li>✓ Project (photo(s) showing all installed modules)</li> <li>✓ Module Information (one photo for each model, must show model number)</li> <li>✓ Revenue Grade Meter (one photo of revenue grade meter location and generation reading)</li> <li>✓ Battery Storage (three photos, if installed)</li> </ul>
<p><b>GENERAL ELECTRICAL (ARRAY)<sup>70</sup></b></p> <ul style="list-style-type: none"> <li>✓ Grounding (one photo showing panel frame is grounded and bonded)</li> <li>✓ Exposed Wire Management (one photo showing proper safety labels and one photo demonstrating proper wiring securing methods)</li> </ul>	<p><b>INTERCONNECTION</b></p> <ul style="list-style-type: none"> <li>✓ Load-Side Connection (one photo of wiring connection in breaker panel)</li> <li>✓ Supply Side Connection (one photo of wire tap or connection to switchboard)</li> <li>✓ Main Distribution Panel (one photo that captures full overview)</li> </ul>

For the General Electrical Array photos (as shown above), the AV manual requires "Exposed Wire Management (one photo showing proper safety labels and one photo demonstrating proper wiring securing methods)". Although only photos of safety labels for exposed wires are required, the program has consistently requested safety label photos for inverters, disconnects, conduit and other electronics. We believe the requests for photos of safety labels are overreach on the part of the program. The AHJ specifies and reviews the safety labels necessary for these projects. Consequently, we

feel the requests are duplicative and wasteful of Approved Vendor, Installer, and Program time and money. If these photos are to be required, the AV manual and the photo guide need to be much more specific about what photos should be included in the Part 2 Application. Section 690.31(G)(3) of the NEC includes the labeling requirements for wiring methods and enclosures that contain PV power source conductors. The specific warning labels should be identified with the NEC code.

#### **RESPONSE #4 :**

The Program Administrator approved this change and the following updates were made in the Approved Vendor Manual to the Photo Guide and this section was updated to match the Photo Guide categories:

- Removed "labeling" from the Exposed Wire Management section;
- Added an additional box in the Approved Vendor Manual (14.3) for "Safety Labeling";
- Removed stricken section: Exposed Wire Management (one photo showing proper safety labels and one photo demonstrating proper wiring securing methods).

#### **FEEDBACK #5 :**

##### *Pg 66 - Savings Calculations*

The upcoming changes to Net Energy Metering Policy could have a profound impact on the ILSFA Program. We are concerned that the AV Manual does not address this issue and believe it must. According to ComEd:

"In order to qualify for ComEd's legacy Net Metering policy ending in 2024, a customer's solar system needs to receive Permission to Operate/Net Metering Completion on or prior to 12/31/24".

We believe that Ameren has the same plan. While we understand that this issue has not yet been settled, we are very concerned about the impact of any change on the ILSfA Program, particularly with regard to the expected vs actual savings that ILSfA customers will experience.

For example, PY7, and many PY6 projects, are unlikely to have Permission to Operate by Jan 1, 2024, meaning the new compensation scheme will apply to these projects.

However, the savings represented by the project owners and the program are based on calculations that assume the existing net metering payment scheme. We have little idea what the replacement for net metering might look like – certainly not well enough to model it for savings in PY7. If a client signs a PPA or lease based on the current net metering assumptions, that client will not receive the savings that are shown in the disclosure and in the PPA. In fact, a customer may not see any savings. We can even

envision a scenario where they would have to pay more for their electricity than they would have without an ILSfA solar array. How will the program and our AVD's communicate the change in the promised savings?

If the information we are obtaining is correct, it seems clear that the Permission to Operate/Net Metering Completing deadline must be extended beyond 12/31/24 or some other accommodation be made. Although beyond the scope of AV manual, the ideal would be for the current net metering to apply to ILSfA projects awarded in PY7. The replacement for net metering would then apply to projects awarded in PY8 and beyond when we know what the new compensation scheme will look like and can adjust savings requirements and/or REC prices to accommodate those changes. At the least, the PY7 disclosure should be modified to alert the customer to these upcoming changes and their potential impact to the projected savings.

#### **RESPONSE #5 :**

The ComEd tariff, Rider POGNM, says the effective start for being classified as an NM7 (which is for getting the credit based on the supply only, not full retail rate) is for a customer who "applies for net metering for an eligible electric generating facility on or after January 1, 2025", not for a customer's solar system that has "received permission to operate/net metering completion". All the generated energy (kWh) that is being consumed by the customer is properly valued at the full retail rate, as that is replacing purchasing those kWh from ComEd at the full retail rate. Under supply-only NM, the customer pays for delivery on the gross amount of electricity pulled from the grid, not the net. For example, if a customer's system generated 10 kWh every day, and the customer used 0 kWh during the day and used 10 kWh every night (during which time the system generated 0), in a 30-day month, they would pay 0 for supply (because that nets out to 0 kWh), but would pay for delivery for 300 kWh. If there is a significant mismatch between when the solar project is generating power and when the customer is using power, even if sized correctly, supply-only NM can significantly impact the bottom line for the customer.

The Program Administrator will not make changes to the Approved Vendor Manual at this time but will update the calculations on the Disclosure Forms and will likely hold a stakeholder process to allow input on how those calculations are done.

#### **FEEDBACK #6 :**

*Pg 49 - Indirect benefits such as lowered rents, stabilized rents, or other benefits or services the value of which can be demonstrated by the property owner or manager, connected directly to the common meter of the building.*

We believe the caveat that restricts the use of “indirect benefits” to a common meter of the building is an unnecessary limitation. Allowing developers and building owners the opportunity to be creative with how benefits are passed to their residents regardless of their electrical metering arrangement may increase participation in what has been a woefully undersubscribed subprogram. We do support review and approval by the program of a written plan for any project that utilizes indirect benefits in lieu of direct net metering (and its replacement). This ensures that the benefits to the residents are real and have an impact on their living situation.

#### **RESPONSE #6 :**

The IPA Act states, "Contracts under the Illinois Solar for All Program shall include an approach, as set forth in the long-term renewable resources procurement plans, to ensure the wholesale market value of the energy is credited to participating low-income customers or organizations and to ensure tangible economic benefits flow directly to program participants, except in the case of low-income multi-family housing where the low-income customer does not directly pay for energy." (20 ILCS 3855/1-56(b)(2)). The Program Administrator does not approve this change and no change will be made to the Approved Vendor Manual.

#### **FEEDBACK #7 :**

*Pg 54 -*

- *Providing a narrative summary of efforts taken prior to the application by the proposed entity to conduct community outreach or education regarding the installation, and*
- *Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation.*

The wording of these requirements does not reflect what has historically been approved by the program nor what the program should be requesting. In particular, the requirement that the narrative should reflect efforts on the part of the non-profit or public facility (NP/PF) to “conduct outreach or education regarding the installation”. Why the installation?

We believe the purpose of the narrative and the community-based organization (CBO) support letters are to demonstrate that the NP/PF actively engages with and impactfully serves the local income eligible or Environmental Justice Community. Narratives that describe meetings and fliers informing the local community that the NP/PF is seeking a REC contract from the ILSfA for a solar installation seem to serve no purpose to us. To date, narratives and the community-based organization (CBO) support letters that



describe the work of the NP/PF with no mention of the solar array have been accepted by the program. We think this is right and should be clarified in these requirements.

We suggest the following language:

- Providing a narrative summary by the proposed entity that demonstrates that the NP/PF actively engages with, and impactfully serves, the local income eligible or Environmental Justice Community, and
- Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of their work in the local income eligible or Environmental Justice Community

#### **RESPONSE #7 :**

The Program Administrator approves this change, and the update has been made to the Approved Vendor Manual.