

Anthony Star, Director
Illinois Power Agency
Michael A. Bilandic Building, Suite C-504
160 North LaSalle Street
Chicago, Illinois 60601
Attention: Mario Bohorquez,
Planning and Procurement Bureau Chief
Via email: mario.bohorquez@illinois.gov
Re: Downstate Caucus comments and recommendations on the Draft Long-Term
Renewable Resources Procurement Plan

Dear Director Star:

The signed members of the Downstate Caucus of the Illinois Climate Table (see last page, below) endorse the following comments and recommendations regarding the IPA Draft Procurement Plan in support of the needs and interests of the people of downstate Illinois.

Adjustable Block Program and Solar for All Integration

Summary: While all ratepayers benefit from the investments to be made under the Adjustable Block Program, low-income ratepayers stand to most benefit through direct access. Additionally, because these programs are funded by all ratepayers through the Cost Cap Rate (as described on page 43 of the Draft Plan), low-income ratepayers should also have access to these incentives to avoid cross-subsidization issues.

Solar for All projects must have access to all available incentives, including the Adjustable Block Program; these financing resources are essential to ensuring that impact for Solar for All Program is maximized. Separating the funding for the Solar for All Program from the funding for the Adjustable Block Program has the potential to create project competition that is disproportionate to the amount of money available. Using a Solar for All adder approach to the Adjustable Block Program will ensure tangible economic benefits are delivered to many more deserving Illinois residents.

The Downstate Caucus agrees with recommended changes to the Draft Procurement Plan developed by the Illinois Solar for All Working Group. They include [alternative wording] for the following sections, addressed chronologically to follow the Draft Plan chapters: Chapter 2, Section 2.6.1. Illinois Solar for All - Overview; Chapter 6, Section 6.5. Adders; Chapter 8, Section 8.2.1. Relationship with the Adjustable Block Program; and Chapter 8, Section 8.4.5. Payment Structure.

[Alternative Wording Proposed]:

- Chapter 2, Section 2.6.1. Illinois Solar for All - Overview

- (p 35) “As discussed further in Chapter 8, the IPA believes that the ~~former~~ [latter] approach is most appropriate; [fundamentally, the RECs contracted from projects receiving incentives under this program can also be] ~~ultimately, the program is administered through awarding contracts for consideration, and that consideration is the delivery of a REC used to satisfy a compliance obligation under Section 1-75(c)(1) of the Act, [as described hereafter].-Ultimately, parsing REC delivery contracts into two components—the base payment for a REC delivery contract and a separate incentive adder, [will allow for the funds available under the Illinois Solar for All Program to support a greater number of projects than if the entire contract value was to be paid with Illinois Solar for All funds. As all projects will deliver multiple RECs over the 15-year time period, there will be no problem in dividing those RECs between two separate contracts. Contracts will be entered into for the delivery of RECs to either the Adjustable Block or Illinois Solar for all Program proportional to the amount of funding that comes from either funding source.].-potentially paid by a different counterparty—appears inconsistent with a program design built around “contracts” rather than rebates or grants.”~~

- Chapter 6, Section 6.5. Adders
 - (p 100) “The following set of Adders are intended to adjust the base REC price to meet specific additional purposes. These include adjusting for system size, adjusting for the additional costs of community solar, [providing incentives to meet the objectives of the Solar for All Program,] and potentially accounting for the changes to net metering, smart inverter rebates and federal tax credits.”

- Chapter 8, Section 8.2.1. Relationship with the Adjustable Block Program
 - (p 137) “...the Agency will administer the Illinois Solar for All Program [in conjunction with] ~~separate from~~ the Adjustable Block Program, but building on the program design of the Adjustable Block Program, with additional considerations specific to Illinois Solar for All. These include ~~a different set~~ of [higher] incentives [via an adder], Illinois Solar for All specific contracts, and additional considerations to ensure community involvement, consumer p
 - Projects that receive a contract through Illinois Solar for All will not be eligible to also receive a contract through the Adjustable Block Program protections, and eligibility.”

- Chapter 8, Section 8.4.5. Payment Structure
 - (p 144) ~~“Projects that receive a contract through Illinois Solar For All will not be eligible to also receive a contract through the Adjustable Block Program.”~~
 - (p 144 Footnote 331) Section 1-56(b)(3) requires that for Illinois Solar for All contracts, “[t]he payment shall be in exchange for an assignment of all renewable energy credits generated by the system during the first 15 years of operation.” Sections 1-75(c)(1)(L)(ii) and (iii) both contain provisions related to the various components of the Adjustable Block Program that, “[t]he electric utility shall receive and retire all renewable energy credits generated by the project for the first 15 years of operation.” These two provisions from Section 1-56(b)(3) and Section 1- 75(c)(1)(L) [can be easily reconciled. As all projects will deliver multiple RECs over the 15-year time period, there will be no problem in dividing those RECs between the Adjustable Block or Illinois Solar for All Program proportional to the amount of funding that comes from either program. If determined to be legally necessary, the installations can be legally deemed two separate systems/projects for the sake of meeting the aforementioned requirements.] ~~are mutually exclusive as only one REC can be produced, transferred, and retired for each MWh of generation.~~

Discussion, Data or Detailed Analyses:

- As the Agency notes, the law structurally appears to permit an incentive premium applicable to Section 1-75(c)(1)(K) Adjustable Block Program REC contract prices (with the Illinois Solar for All Program simply entailing the administration of additional incentives). **Therefore, please do not isolate and limit the Solar for All Program; instead, provide higher incentives in the Solar for All Program as an adder to the Adjustable Block Program. If the program is not structured in this way, low-income customers will have significantly reduced access to funding under this program.**
- As the Adjustable Block Program declines, the adder from the Illinois Solar for All Program should increase to ensure the end value is an incentive level that allows developers, installers, or the non-profit third-party Program Administrator(s) to offer solar at no upfront cost to the income-qualified participant and offer immediate and significant savings. An adder approach will result in tangible economic benefit for many more income-qualified Illinois residents.

- An example is the [Massachusetts Smart Program](#), which includes a \$.06 / kWh adder for low-income solar projects.

Adjustable Block Grouping Related to Municipal Utilities and Rural Cooperatives

Summary: On page 94 of the IPA Draft Procurement Plan it is written: “The assignment of projects in the service territories of Mt. Carmel Public Utility and the rural electric cooperatives to Group A, and MidAmerican and municipal utilities to Group B, is intended to approximately match those smaller entities to a larger utility with comparable electric rates.”

As the only specific rationale given for grouping the Munis with ComEd in regards to incentive values is an “intention” that “approximates” to best match the Munis with the IOU possessing “comparable electric rates,” to demonstrate that this assumption is not in alignment with what the data indicates, would be to refute the assumptions and reasoning underlying recommended Group A and Group B distribution.

Chapter and Section:

Section 6.3, page 94; Section 8.6.13, page 147; and Section 8.6.2.1, page 149.

Recommended Change:

The Downstate Caucus recommends that Municipal Utilities be grouped in the same category as Rural Cooperatives, Ameren and Mt. Carmel Public Utility due to the fact that municipal utilities are more logistically aligned with Ameren/Rural Cooperative territories.

Basis for Change:

- **Parity in Ameren / Cooperative Territories** - Keeping Municipal Utilities in the same Group B with ComEd creates a situation where nearby neighbors in Ameren/Cooperative territories would be experiencing higher REC prices and incentives that those residents located in Municipal Territories. Our group is addressing this concern specific to Community Solar and Solar For All Incentive pricing as referenced in the sections indicated above.
- **Closer Alignment with Ameren, Residential** - From the residential perspective, the overall kWh rates for the both the Munis in the north and south far more closely align with Ameren rates than with ComEd rates. If rate parity is the rationale, then clearly in terms of residential DG solar, Munis need to be in the same Group A as Ameren and Rural Cooperatives.

- **Closer Alignment with Commercial and Community Solar** - From the commercial and community solar perspective, data indicates that while the Electric Supply Charge in ComEd and Ameren Illinois are comparable, the Electric Supply Charge for Munis via IMEA is at a categorically higher rate than either IOU, which also would definitely not support a grouping of Munis with ComEd as opposed to Ameren.

Low Income Community Solar Project Initiative

Summary: Within the Low Income Community Solar Project Initiative, it is imperative that the term “community stakeholder” be defined such that project vendors are partnering with stakeholders that have a long standing commitment to community residents and addressing community issues that are identified and defined by residents.

Chapter and Section: Chapter 8, Section 8.6.2 Low Income Community Solar Project Initiative.

Sentence(s) and Page Number(s): Chapter 8, Section 8.6.2 Low-Income Community Solar Project

“For the first provision, all Approved Vendors submitting a Low-Income Community Solar Project will need to include in their application a description of a partnership with community stakeholders in the community where the project will be located. While the Act does not define the term “community stakeholders,” guidance could be found in the federal Elementary and Secondary Education Act, which defines a “community-based organization” as “a public or private nonprofit organization of demonstrated effectiveness that (A) is representative of a community or significant segments of a community; and (B) provides educational or related services to individuals in the community.”

“Additionally, the National Community–Based Organization Network (NCBON) defines a community-based organization as one in which:

- The majority of the governing body and staff consists of local residents,
- The main operating offices are in the community,
- Priority issue areas are identified and defined by residents,
- Solutions to address priority issues are developed with residents, and
- Program design, implementation, and evaluation components have residents intimately involved, in leadership positions.” (p 148)

[Alternative Wording Proposed]: Chapter 8, Section 8.6.2 Low Income Community Solar Project Initiative (p. 148):

“For the first provision, all Approved Vendors submitting a Low-Income Community Solar Project will need to include in their application a description of a partnership with community stakeholders in the community where the project will be located. While the Act does not define the term “community stakeholders,” primary guidance for this term pursuant to this Act shall be found in the National Community–Based Organization Network (NCBON) definition.

The NCBON defines a community-based organization as one in which:

- The majority of the governing body and staff consists of local residents,
- The main operating offices are in the community,
- Priority issue areas are identified and defined by residents,
- Solutions to address priority issues are developed with residents, and
- Program design, implementation, and evaluation components have residents intimately involved, in leadership positions.”

Discussion, Data or Detailed Analyses: The Downstate Caucus concurs with the perspective of the Illinois Commission on Environmental Justice that the latter definition of a “Community-Based Organization” from the National Community-Based Organizing Network serves as the strongest guidance on how to identify what bodies are identified as community stakeholders. Thus, the plan should change the order to indicate primary guidance from the NCBON definition.

Illinois Solar for All Certified Installers and Solar Pipeline Trainees

Summary: The Agency proposes that Approved Vendor/Illinois Solar for All Certified Installer demonstrate that at least 33% of their projects include one or more trainees from the solar training pipeline program.

Chapter and Section: Chapter 8, Section 8.10, p. 154.

Sentence(s) and Page Number(s): “IPA proposes that Approved Vendors who participate in the Illinois Solar for All program should demonstrate that at least 33% of projects include the use of one or more job trainees from the solar training pipeline program.” (p 155)

[Alternative Wording Proposed]: IPA proposes that [Illinois Solar for All Certified Installers] who participate in the Illinois Solar for All program should demonstrate that at least 33% of projects include the use of one or more job trainees from the solar training

pipeline program [through one of the following options in the program: community solar, distributed residential and/or public facilities distributed generation].

Discussion, Data or Detailed Analyses: The Downstate Caucus concurs with the Illinois Solar For All Working Group that the IPA should clarify that this program covers all FEJA installations except for utility scale solar.

Connecting Solar Pipeline Trainees to Illinois Solar for All Projects

Summary: The Agency should expand on how to connect to all the training provided in the state to projects.

“Soft skills” Chapter and Section: Chapter 8, Section 8.11

Sentence(s) and Page Number(s): “For projects that receive the Low-income distributed generation incentive, a commitment to hire job trainees for a portion of the projects.” (p 156)

[Alternative Wording Proposed]: For projects that receive the Low-income distributed generation incentive, a commitment to hire job trainees for [at least 33%] of the projects. [If for every 3 consecutive Solar for All installation projects by an Illinois Solar for All Certified Installer, there isn't one project that includes approved participation of a trainee, the approved vendor must submit a waiver to continue working on Solar For All projects. Work completed by the trainee must fit into 3 categories that are in line with the [NABCEP PV Installer job task analysis](#) categories:

- Directly Working on the Installation
 - Safeguard against hazards
 - Install raceways
 - Install DC PV system conductors
 - Install AC PV system conductors
 - Install grounding and bonding systems
 - Complete utility interconnection point
 - Install system monitoring, control, and communication hardware
 - Install battery equipment
 - Install ground-mounted structure
 - Install building-mounted system

- Install PV modules

- System Design
 - Prepare system equipment configuration recommendations
 - Prepare system sizing recommendations
 - Prepare an electrical diagram
 - Prepare structural requirement considerations

- System Commissioning
 - Review or develop commissioning protocol
 - Complete visual and mechanical inspection
 - Conduct mechanical tests
 - Conduct electrical tests
 - Verify system operation
 - Confirm project completion
 - Orient end user to system]

Discussion, Data or Detailed Analyses: The Downstate Caucus concurs with the Illinois Solar For All Working Group that the word “portion” is too vague. This should refer back to the above requirements for the Approved Vendors/Illinois Solar for All Certified Installers and specifically say “33%”. There is not enough specific language on how the program administrator will coordinate between the jobs and training.

Proposed Approach for Defining Environmental Justice Communities

Summary: Proposed approach for Defining Environmental Justice Communities. The Downstate Caucus, along with the Illinois Solar for All Working Group, strongly supports the the Illinois Power Agency’s use of a methodology sourced from the CalEnviroScreen

approach to mapping environmental justice communities. This includes the use of federal databases for environmental and demographic key indicators.

The Downstate Caucus supports the Illinois Commission on Environmental Justice and Illinois Solar For All Working Group's recommendations for additional indicators and database sources for indicators to augment the designation and mapping process. We agree that the inclusion of minority percentage in the list of demographic indicators is strongly supported by the Illinois Solar for All Working Group as it follows closely to the U.S. Environmental Protection Agency definition of "overburdened community" and reflects numerous studies indicating the disproportionate impacts of environmental harm on communities of color. Additionally, we support the Illinois Solar for All Working Group's recommended change from Census tracts to Census blocks in the methodology, as well as a process for testing the model and ongoing evaluation of the mapping process moving forward.

Chapter and Section: Chapter 8, Section 8.15.2 Proposed Approach for Defining Environmental Justice Communities (p. 165)

Sentence(s) and Page Number(s): "The Agency proposes to determine Environmental Justice Communities by analyzing data from Illinois Census tracts for the following environmental and demographic indicators, as described by the EJ SCREEN Tool:

- National-Scale Air Toxics Assessment (NATA) air toxics cancer risk
- NATA respiratory hazard index
- NATA diesel PM
- Particulate matter
- Ozone
- Traffic proximity and volume
- Lead paint indicator
- Proximity to Risk Management Plan sites
- Proximity to Hazardous Waste Treatment, Storage and Disposal Facilities
- Proximity to National Priorities List sites
- Wastewater Dischargers Indicator

And the following demographic indicators also used by EJSCREEN:

- Percent Low-Income
- Percent Minority
- Less than high school education
- Linguistic isolation
- Individuals under age 5
- Individuals over age 64

“The Agency would then weight each factor using an approach adapted from CalEnviroScreen: Census tracts would be ranked for each environmental and demographic indicator, a resulting percentile score would be found for each tract, and the percentile scores would be averaged, resulting in an environmental and demographic score for each tract. The two averages would be multiplied together to determine a score.” (p 165-166)

[Alternative and Supplementary Wording Proposed]:
(p 165-166) [SUPPLEMENTARY, ADD]

- “Individuals over age 64”

Add the following demographic indicators for Sensitive Population Characteristics sourced from the Illinois Department of Public Health:

- Asthma Emergency Department Visits
- Low Birth Weight Infants

Add the following database sources for demographic indicators for Sensitive Population Characteristics sourced from the Illinois Department of Public Health (“IDPH”):

- Asthma Emergency Department Visits (IDPH)
- Low Birth Weight Infants (IDPH)

Add the following database sources for environmental indicators from the Illinois Environmental Protection Agency (“Illinois EPA”):

- Drinking Water Watch (Illinois EPA)

- Site remediation program (Illinois EPA)
- Leaking Underground Storage Tank Incident Tracking ("LUST") (Illinois EPA)
- State Response Action Program (Illinois EPA)
- Solid Waste facilities (Illinois EPA)

[ALTERNATIVE, CHANGE from tract to block(s) throughout] “The Agency proposes to determine Environmental Justice Communities by analyzing data from Illinois Census blocks for the following environmental and demographic indicators, as described by the EJ SCREEN Tool:”

“The Agency would then weight each factor using an approach adapted from CalEnviroScreen: Census blocks would be ranked for each environmental and demographic indicator, a resulting percentile score would be found for each block, and the percentile scores would be averaged, resulting in an environmental and demographic score for each block. The two averages would be multiplied together to determine a score.”

- **Discussion, Data or Detailed Analyses:**
 - **On addition of Sensitive Population Characteristics for asthma, low birth weight infants:** As identified in CalEnviro Screen 3.0 Identification Methodology, Illinois should also consider Sensitive Population Characteristics. Asthma Emergency Department Visits and Low Birth Weight Infants should be considered as additional indicators. The Illinois Department of Public Health (IDPH) maintains data on asthma and has incorporated it into an interactive map, which can be found here: <http://www.healthcarereportcard.illinois.gov/map>. The IDPH is a member of the EJ Commission and will continue to be a valuable resource concerning the asthma data that it collects. Low birth weight infants data can be pulled from birth records, as well as hospital discharge records. There are some statistics at the county level posted on the IDPH Birth Statistics webpage, under the heading “BirthCharacteristics”: <http://www.dph.illinois.gov/data-statistics/vital-statistics/birth-statistics/more-statistics>
 - **On use of census blocks instead of census tracts:** The Draft Plan states that demographic and environmental factors will be evaluated at the census tract level, when USEPA EJ SCREEN utilizes census blocks. It is the EJ Commission’s recommendation that demographic and environmental factors be evaluated at the census block level in accordance with USEPA EJ SCREEN

measures. The primary rationale for this is that census blocks are the smallest available unit of land for both sets of indicators, and inclusion of data that is aggregated for larger units of land in census tracts may dilute how closely indicators approximate very local environmental justice community impacts for census blocks directly adjacent to census blocks that are less impacted by specific indicators.

- **On use of census blocks instead of census tracts:** The Illinois Solar for All Working Group notes that the Draft Plan states that demographic and environmental factors will be evaluated at the census tract level, when USEPA EJ SCREEN utilizes census blocks. We recommend that demographic and environmental factors be evaluated at the census block level in accordance with USEPA EJ SCREEN measures and practices, as well as measures and practices typically applied by the Illinois Environmental Protection Agency demographic screening tool for permitting identification of potential environmental justice communities. The primary rationale for this is that census blocks are the smallest available unit of land for both sets of indicators, and inclusion of data that is aggregated for larger units of land in census tracts may dilute how closely indicators approximate very local environmental justice community impacts for census blocks directly adjacent to census blocks that are less impacted by specific indicators.

- **On the use of Drinking Water Watch as a data source:** The current list of indicators incorporates one drinking water indicator. The Illinois Solar for All Working Group recommends incorporation of the Drinking Water Watch database, which gives access to Water System Facilities, Sample Schedules, Sample Results, Violations, and Enforcement Actions. The database is located at <http://water.epa.state.il.us/dww/index.jsp>. These factors can augment the designation and mapping of environmental justice communities, as well as provide additional context for factors that could contribute to self-designation.

- **Illinois Environmental Protection Agency Bureau of Land database information:** Only one indicator used in EJSCREEN directly concerns remediation activities: proximity to National Priorities List (“NPL”) sites. Illinois EPA’s site remediation database, Leaking Underground Storage Tank Incident Tracking (“LUST”) database and state sites in Illinois EPA’s State Response Action Program are additional sources of information that could can augment the designation and mapping of environmental justice communities, as well as provide additional context for factors that could contribute to self-designation by painting a fuller picture of environmental conditions in Illinois. Additionally, the

Illinois EPA issues permits for the management of non-hazardous waste at landfills, transfer stations, compost, and waste storage, treatment, processing, and recovery facilities and that information is accessible via the solid waste database. Solid waste permit information is another source of information reflective of the relative environmental burden impacting a community.

The database locations include:

- www.epa.illinois.gov/topics/cleanup-programs/bol-database/index
- Site remediation: epadata.epa.state.il.us/land/srp/index.asp
- The Leaking Underground Storage Tank Incident Tracking ("LUST") database: www.epa.illinois.gov/topics/cleanup-programs/bol-database/leaking-ust/index
- State sites in IEPA State Response Action Program: epadata.epa.state.il.us/land/ssu/index.asp
- Solid waste: epadata.epa.state.il.us/land/solidwaste/index.asp

Environmental Justice Communities 25% Goal & Capacity Building

Summary: The Downstate Caucus stands with the Illinois Commission on Environmental Justice in supporting allocating 25% of the Agency's annual budget in accordance with the 25% goal per the statute for environmental justice communities for the Low-Income Distributed Generation Incentive, the Low-Income Community Solar Project Initiative, and the Incentives for Non-profits and Public Facilities as specified in the Plan.

The Downstate Caucus also concurs with EJ Commission recommended amending of the structure for reserving such funds as subsequently detailed in order to allow for appropriate capacity-building needed for the process of proposing projects, prioritizing grassroots education funding for environmental justice communities and recommending further specifications on the meaning of prioritization below.

Chapter and Section: Chapter 8, Section 8.15.4 Environmental Justice Communities 25% Goal

Sentence(s) and Page Number(s): Chapter 8, Section 8.15.4 Environmental Justice Communities 25% Goal.

"For the Low-income Distributed Generation Incentive, the Low-Income Community Solar Project Initiative, and the Incentives for Non-profits and Public Facilities, the

Agency will reserve 25% of each category’s annual budget to support projects in environmental justice communities. In each delivery year, for each category, if after nine months these reserved funds are remaining and unallocated to projects in environmental justice communities, the funds will be released for use by projects not in environmental justice communities. If the funds are fully allocated to projects in environmental justice communities, then subsequent projects in environmental justice communities would still be eligible using the general available budgets.” (p 167)

“The Act also directs the Agency to “allocate up to 5% of the funds available under the Illinois Solar for All Program to community-based groups to assist in grassroots education.” As noted in Section 8.8, that funding will be prioritized towards Environmental Justice Communities to help meet this goal.” (p 167)

[Alternative Wording Proposed]: “For the Low-income Distributed Generation Incentive, the Low-Income Community Solar Project Initiative, and the Incentives for Non-profits and Public Facilities, the Agency will reserve 25% of each category’s annual budget to support projects in environmental justice communities. In each delivery year 2018, 2019, and 2020 for each of the three aforementioned incentives, the reserved funds will be preserved through the end of the delivery year and rolled over into the budget for the next delivery year to the extent legally permissible and practicable until the following delivery year for projects in environmental justice communities. A review of the reallocation process and program years selected will be included in the next iteration of plan development in 2019. Beginning with delivery year 2021, the Agency will reserve 25% of each category’s annual budget to support projects in environmental justice communities, and if after nine months these reserved funds are remaining and unallocated to projects in environmental justice communities, the funds will be released for use by projects not in environmental justice communities. In all delivery years, if the funds are fully allocated to projects in environmental justice communities, then subsequent projects in environmental justice communities would still be eligible using the general available budgets.” (p 167)

“The Act also directs the Agency to “allocate up to 5% of the funds available under the Illinois Solar for All Program to community-based groups to assist in grassroots education.” As noted in Section 8.8, that funding will be prioritized towards Environmental Justice Communities to help meet this goal. For the purposes of prioritization, 3% of the funds available under the Illinois Solar for All Program will be directed toward Environmental Justice Communities to help meet this goal. The Agency will utilize results from the Environmental Justice Community Designations (Chapter 8, Section 8.15.3 Environmental Justice Community Designations) of this Plan to identify the communities from which community stakeholders will be prioritized in receiving funds to assist in grassroots education under the prioritized funds. Funds may be used for activities including research in preparation of materials for communities, community meetings or forums hosted to disseminate materials, printing costs, and translation costs of materials for communities requiring materials in languages other than English. The Agency will collaborate with the EJ Commission for technical assistance on best practices to connect communities with the opportunity to engage in grassroots

education. The Agency will allocate 1% of the funds available under the Illinois Solar for All Program for grassroots education for each of the first five program years - 2018 through 2022 - such that grassroots education funding be available to community stakeholders for the outset of the program and to prevent early exhaustion of the funds. The Agency will solicit proposals from communities in the first quarter of each program year beginning in 2018 until funds are exhausted. Materials developed for grassroots education under this funding will be made available to members of the public on the Agency's website so that community stakeholders from economically disadvantaged communities throughout Illinois can utilize and adapt these materials for their community's use in grassroots education even if such communities are not direct recipients of grassroots education funds.

Discussion, Data or Detailed Analyses:

- **On changes to reservation and reallocation of funds:** The Downstate Caucus joins the EJ Commission in recommending that reallocation of reserved funds not commence until after the first three program years of the IL Solar for All program, and be accompanied by an evaluation of how the mechanism is functioning as part of the next iteration of the development of the Long-Term Renewable Resources Procurement Plan in 2019. The rationale comes directly from representatives of environmental justice communities throughout the state who are concerned that rural communities, smaller communities without local organizations working on environmental justice issues, and communities needing to go through the self-identification process prior to submitting projects for reserved funds will need additional time to prepare to submit projects. These communities will also need the opportunity to grow their capacity to manage project submissions and respective partnerships; and take the time needed to vet solar energy concepts, specific project ideas, and respective characteristics with members of their communities. This time will be needed most at the front end of deploying the program.
- **On grassroots education prioritization and selection:** The Downstate Caucus also joins the EJ Commission in recommending that specificity around what amount of funds is intended by prioritization of EJ Communities, how such recipients will be identified, how funds can be used, and what process will be used is critical to the function of the education component. This recommendation includes a timeline and model for the utilization of funds to maximize the ability of community stakeholders to engage in grassroots education for the outset of the program and to prevent funds from being exhausted early in the program period. Additionally, transparency, consistency, and public availability of materials developed for these programs will be key, and this will maximize the use of the money toward grassroots education for the benefit of economically disadvantaged communities throughout the state.

The Downstate Caucus of the Illinois Climate Table looks forward to continued interaction and collaboration with the Illinois Power Agency, providing a unique and vital voice in this dialogue that serves the needs and interests of the people of the downstate Illinois.

Sincerely,

Brent Ritzel, Project Developer, StraightUp Solar

Pamela J. Richart, Co-Director, Eco-Justice Collaborative

Carol Hays, Executive Director, Prairie Rivers Network

Michelle Knox, Owner/Founder/President, WindSolarUSA, Inc.

Aur Beck, Owner/Chief Tech, AES Solar (Advanced Energy Solutions Group, Inc)

Scott Allen, Environmental Outreach Coordinator, Citizens Utility Board

Dick Breckenridge, BlueGreen Alliance

Gregory Norris, Environmental National NAACP

Cindy Shepherd, Outreach Director for Central Illinois, for Faith in Place.