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Mid-America Carpenters Regional Council Comments to the Illinois Power Agency's Draft 2022 Long-Term Renewable Resources Procurement Plan

The Mid-America Carpenters Regional Council ("MACRC") appreciates the opportunity to submit the following comments regarding the Illinois Power Agency's ("IPA") Draft 2022 Long-Term Renewable Resources Procurement Plan (2022 Plan), dated January 13, 2022. MACRC's comments for your consideration are as follows:

8.9.1. Job Training Requirements

MACRC requests that the IPA's 2022 Plan clarify that job trainees from Other Qualifying Programs, "OQP's" will be given the same priority in hiring as job trainees from programs created under Section 16-108.12 of the Public Utilities Act, i.e. the solar training pipeline, craft apprenticeship program and the six "multi-cultural" jobs programs.

The IPA's Approved Vendor Manual, dated April 22, 2021 requires that when approved vendors use "... Qualified Job Trainees from an OQP, the Approved Vendor is required to provide documentation demonstrating that it first attempted to hire someone from the FEJA Workforce Development Programs before hiring someone from an OQP.

The IPA's Draft 2022 Plan explains that , "... as added to Section 1-56(b)(2) by Public Act 102-0662, all Illinois Solar for All sub-program descriptions direct that "[c]ompanies participating in this program that install solar panels shall commit to hiring job trainees for a portion of their low-income installations" However, as the IPA notes, "The Act does not specify what is meant by "a portion" and also does not define who would qualify as a "job trainee" in contrast with the prior provision that specifically ties it to the solar training pipeline program." The Draft 2022 Plan goes on to state that, "The Agency infers that graduates of both the training programs created by Section 16-108.12 of the Public Utilities Act as well as designated Other Qualifying Programs could

reasonably be considered “job trainees” for the purposes of Illinois Solar for All job trainee employment requirements.” (Draft 2022 Plan, pp 244-245)

It is unclear from the Draft 2022 Plan whether job trainees from QP’s shall be prioritized over job trainees from OQP’s as required by the IPA’s April 22, 2021 Approved Vendor Manual. MACRC is requesting that job trainees from OQP’s be given the same hiring priority as job trainees from QP’s and that the IPA recognize the training provided by OQP’s as equivalent to the training provided by QP’s.

MACRC’s Apprenticeship Program, which is an approved OQP, introduces its apprentices to the solar and distributed generation training curriculum, along with the multi-craft training modules, skilled advancement training and continuing education classes that are available to all Carpenters Union members. Our program is a NABCEP training provider with our Advanced Solar Installer training consisting of classroom and hands on installations, ranging from the layout of the solar fields and rooftops, concrete footing and pad installations, concrete ballasted systems, solar piles and posts installation, solar racking layout and rail assemblies, module frame connectors and modules installation in its entirety connection, rooftop ballasting, and general structural engineering tasks.

MACRC can ensure career pathways in distributed generation with sustainable employment because of our cross trained workforce. With 51% minority participation in our programs across the state of Illinois, we are able to assist the Agency in meeting the equity standards required by the Illinois Solar for All programs and therefore, our trainees should be given equal priority in hiring as job trainees from a QP.