



September 29, 2023

TO: Illinois Power Agency

FR: Illinois IBEW Renewable Energy Fund

RE: Draft 2024 Long-Term Renewable Resources Procurement Plan

The Illinois IBEW Renewable Energy Fund (REF) has been facilitating the Craft Apprenticeship Program since 2017. This program, authorized under the Future Energy Jobs Act (FEJA), has established 30 training partners across Illinois including 17 IBEW Local Union Apprenticeship schools, 6 High Schools, 3 Community Colleges, Cook County Department of Corrections, and 3 Community-Based Organizations. Our mission involves extending electrical industry career opportunities through Department of Labor Registered Electrical Apprenticeship Programs to historically underserved, justice involved, employment displaced, and career change populations from all backgrounds and regions State-wide. This past June we concluded our first year of training under a new grant from the Illinois Department of Commerce and Economic Opportunity (DCEO). We are proud to state that 452 individuals completed training during this grant period with the vast majority securing employment with established Illinois-based Electrical Contractors signatory to the IBEW. The employment they gained through hard work and dedication is not simply a job in the solar industry, it is one step in a career in the Union electrical industry. A career that is family sustaining, that will provide a lifetime of learning opportunities, that supports entrepreneurship and upward and outward mobility. In the electrical apprenticeship, they will learn skills that prepare them for all electrical systems including Solar Electric, Energy Storage, Electric Vehicle Charging, Energy Efficiency, and beyond.

These 452 individuals are in addition to the over 2,000 trained in the first grant by the REF that the Illinois Power Agency (IPA) has disenfranchised by not including the Craft Apprenticeship and the training they all completed in the definition of an Equity Eligible Person or Contractor (EEP, EEC) in the Draft 2024 Long-Term Renewable Resources Procurement Plan. Many of our graduates are currently working in the renewable energy industry. However, as the Minimum Equity Standard (MES) percentage increases, their employers will not qualify and they will be excluded from the work they have developed passion for.

The efforts to create race and gender neutral language for EEP, EEC, and the MES provides a disservice to the populations CEJA is designed to benefit. A person's criminal history, foster-care status, and housing situation does not determine their station in life and does not recognize the racial and gender-based discrimination they may have experienced. The majority of our graduates are from communities that have been historically underserved, experienced discrimination in employment, borne the burden of environmental policies of the past, and experienced loss of employment opportunities due to plant and farm closures. Many are employed by Certified MBE/WBE/DBE Electrical Contractors that create employment opportunities in their local communities. These disadvantaged businesses will also be excluded from bidding on projects in their communities if the ownership does not meet the current EEP definition. The IPA recognizes the other two workforce development programs created under FEJA. It is past time to recognize the Craft Apprenticeship.

Further, the workforce development programs authorized under the Climate and Equitable Jobs Act (CEJA) have yet to materialize, will take time to stand up, will be competing for the same participants, and will likely lead to transient jobs and not true career opportunities. The IPA needs to reconsider their exclusion of the Craft Apprenticeship Program and recognize the efforts of all of our graduates and training partners that are doing their part to meet the ambitious equity goals set forth in CEJA. These are the same goals that have been highlighted in the press recently. Not highlighted as a model for other states, or an example of true environmental and social justice, Illinois has been criticized for not meeting the requirements set forth in CEJA.

<https://chicago.suntimes.com/2023/9/22/23884382/pritzker-climate-law-clean-energy-jobs>

This is not the first correspondence I have submitted to the IPA to address this issue. The current draft of the 2024 Renewable Resources Procurement Plan does not reflect any of our formal stakeholder feedback submittals or conversations with the IPA on this matter. The only logical conclusion that can be made from this lack of recognition is that the IPA is looking at this feedback requirement as a formality and has no intention of actually addressing serious concerns brought before them on this matter.

I will again state for the record that a very simple solution to the problematic definitions Equity Eligible Person and Equity Eligible Contractor to meet the Minimum Equity Standard are as follows.

“Equity Eligible Contractor” means a Certified Disadvantaged Business Enterprise (DBE, MBE, WBE, or VBE) Licensed, Bonded, and Insured Electrical Contracting business that is majority owned by Equity Eligible Persons, or a Certified Disadvantaged Business Enterprise (DBE, MBE, WBE, or VBE) Licensed, Bonded, and Insured General Contracting business, nonprofit, or cooperative that employs Licensed Electrical Subcontractors and is majority-governed by Equity Eligible Persons as defined below:

- 1) Persons who graduate from or are current participants in any of the following:
 - a. Workforce Development Programs authorized under the Future Energy Jobs Act (Solar Pipeline, Craft Apprenticeship, Multicultural Solar Training programs).
 - b. Workforce Development Programs authorized under the Climate and Equitable Jobs Act (Clean Jobs Workforce Network, Clean Energy Contractor Incubator, IL Climate Works Pre-apprenticeship, Returning Citizens Clean Jobs Training, or Clean Energy Primes Contractor Accelerator programs).
- 2) Persons who are graduates of or currently enrolled in the foster care system.
- 3) Persons who were formerly incarcerated, excluding contract fraud convictions.
- 4) Persons whose primary residence, or established primary place of business is in an Equity Investment Eligible Community.

The recommended changes to this program ensure that the contractors benefiting from the EEC designation are appropriately Licensed, are Certified Disadvantaged Business Enterprises, that all graduates of Workforce Development Programs authorized under FEJA and CEJA are represented, that participants do not have histories including a conviction of contract fraud, and that businesses based in and creating employment opportunities in Equity Investment Eligible Communities are included.

Respectfully submitted,



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Illinois IBEW Renewable Energy Fund