

To: Illinois Power Agency @ IPA.ContactUs@Illinois.gov
Re: The IL Solar for All Working Group of the IL Clean Jobs Coalition- Chapter 8 LTP
Feedback
Date: September 29, 2023

The Illinois Solar for All Working Group appreciates the opportunity to comment on Chapter 8 of the Agency's 2024 Long Term Renewable Resources Procurement Plan. Please find our comments below.

Signatories:

A Just Harvest
Central IL Healthy Community Alliance
Central Road Energy LLC
Citizens Utility Board of Illinois
Community Organizing & Family Issues (COFI)
Environmental Law and Policy Center
Faith in Place
Illinois Environmental Council
Little Village Environmental Justice Organization
People for Community Recovery
Renewable Energy Evolution
Seven Generations Ahead
Sustain Rockford
Union of Concerned Scientists
Vote Solar
Kenwood Oakland Community Organization

8.4 Funding & Budget

8.4.4-Use of Settlement Funds

Comment: The ILSFA Working Group supports close partnership with the Community Action Agencies and other LIHEAP providers to provide community solar savings as another tool for energy burden reductions. This is in line with CEJA's statutory directive to better coordinate with other programs that offer low-income energy services like weatherization and bill assistance. The Agency should make clear that CAAs are permitted to send interested clients directly to those Approved Vendors accepting subscribers.

If the Department of Energy's National Community Solar Partnership includes funding to support LIHEAP providers in taking on this additional toolkit, then we propose the settlement funding be used elsewhere and offer an alternative use of the funds below. If such federal funding does not exist, then we encourage the IPA to make exceptions to the rules that allow for direct collaboration between recipients of funding and specific Approved Vendors or subscription managers in cases where that is in the best interests of beneficiaries.

Whether it is as a substitute or supplement, the ILSFA Working Group requests that this funding be used to build brand awareness of the program and overhaul the customer onboarding process. The ILSFA brand lacks any real public engagement. The Grassroots Educator program does a great job of increasing awareness in specific target communities, but doesn't result in the marketing and awareness campaigns that could pique the interest of a broader range of potential customers. We request that a consultant with experience crafting intuitive user-interface (UI) portals redesign the customer onboarding process and create a new publicly-accessible URL that is specifically designed for prospective customers.

Once that new URL is created, the link and associated QR code should be on bus stops and billboards and flyers all over the state, perhaps with assistance from the Grassroots Education Organizations. It should be clearly advertised as a government program and should include metrics and tracking for success in program outreach. This has long been a missing piece of the ILSFA program, [as evidenced by this letter from Vote Solar and Prairie Rivers Network from 2020](#). We believe that using funds in this way will enhance the overall program and support the success of the Bright Communities pilot.

8.5 Illinois Solar for All Sub-Programs

8.5.3 Residential solar (small) subprogram system sizing

Comment: We support the Agency's proposal to place a cap on Residential Solar projects to 150% of historical annual usage. We also support the exception to develop a project up to 200% of historical annual usage, as long as there is documentation that proves the need for the oversizing of the system. We believe in the Agency's goal of supporting electrification for income-eligible homes, while still working to avoid improper use of program resources. We would encourage the Agency to review the sizing limits with stakeholders in future years as the beneficial electrification programs are implemented.

8.5.5 Community Solar

Comment: We strongly encourage the Agency to stand firm in its support of single-bill net crediting. Grassroots educators in our working group have firsthand experience in the difficulties that income-qualify households (particularly those at the lower income thresholds) have in:

1. Understanding how the two-bill system is an improvement for them;
2. Having the financial ability to manage and pay an additional bill (i.e. some households have to purchase money orders to pay their bills); and
3. Managing payment of a multi-month bill from a community solar provider (which happens often with new subscriptions).

We also note the increased ease for grassroots educators and their audiences in explaining and understanding a single-bill subscription, resulting in more support for the program. Unfortunately, we understand the recent experiences with both utilities has

presented some real challenges. For instance, we have heard from community solar developers and providers in the group that the current ComEd single-bill plan is not workable. It is essential that utilities are offering plans that do not harm businesses or consumers. The IPA should work with the ICC on improving the single-bill net crediting plan proposed by the utilities, and evaluate its success once it's implemented. The Working Group supports the Agency's commitment to continue to monitor the pace of project application and development in the ILSFA Community Solar sub-program, as well as the implementation of single-billing with ILSFA Approved Vendors.

Community Solar Subscription Sizing

Comment: The Working Group supports allowing an increase in subscription sizing up to 200% of prior year usage.

25kw cap on mastered metered affordable multi-unit housing projects

The Working Group supports the Joint Solar Parties' (JSP) conviction that non-anchor master-metered affordable housing buildings should continue to be permitted to enroll aggregate subscriptions larger than 25 kW. The recently imposed 25 kW cap will prevent affordable housing residents from participating in the program unless their unit is an anchor tenant of the project, which greatly limits the opportunity for these residents to participate. The ILSFA Program does not restrict allocation limits for any other type of subscriber; it seems unjust to place such restriction here.

We agree with the JSP that allowing affordable housing providers to participate would increase equity and lower energy burden for more low-income households. Excluding them would penalize some of the most in-need families that the program was created to help. Many public housing developments, which have the lowest income-eligibility requirements of all low-income housing providers, will not be able to participate as a non-anchor. We don't know of another community solar market where an allocation cap applies to non-anchor, master-metered buildings. Most states have specifically created special exceptions for master-metered buildings to be eligible for low-income residential off takers (non-anchor) because of the unique ability to increase access to low-income households outside of the anchor tenant portion of the project. Pairing this with a 25 kW cap contradicts this intent, as this limits any meaningful benefit to participating subscribers (most allocations for a master-metered development are well over 250 kW+). Clearly, a 25 kw subscription size limit will prevent these housing units from participating in the program, and some type of adjustment will be needed.

We also agree with the JSP that should the Agency retain this inequitable restriction, it should not apply retroactively. Perhaps the Agency can make this clear in the Long Term Plan and follow such clarification with an amendment to the AV Manual.

Improving Community Solar Program Recognition

Program recognition and understanding are also significant barriers to enrollment in ILSFA community solar projects. The IPA should consider mandating some level of

participation in customer education by the utilities. We recommend requiring simple bill inserts at least twice a year to provide legitimacy to the ILSFA community solar offerings and to raise awareness of the program throughout Illinois.

8.8.3 Energy Efficiency Programs & Community Action Agencies

Comment: The Program Administrator's energy efficiency Resource Guide will be a very helpful asset to the overall community of low-income energy providers. The ILSFA Working Group envisions a document that could provide a low-income customer a roadmap for how to access wraparound support that will make their homes warmer, safer, and more reliable. It is our collective understanding that this type of resource does not yet exist, but would be mutually beneficial to both the energy efficiency programs and to the low-income solar programs. We urge the IPA and the ILSFA Program Administrator to work closely with the Department of Commerce and Economic Opportunity, the energy efficiency Stakeholder Advisory Group, and the utilities providing low-income energy programs to create a comprehensive and navigable list of available programs. Simple flowcharts and graphics would be particularly helpful in understanding the typical sequence of energy interventions.

IPA should ensure that the ILSFA Program Administrator educates grassroots education organizations about the importance of energy efficiency and the various programs that are available until the Resource Guide is finalized so they have the ability to inform potential customers. The Resource Guide will also ideally be available on the Illinois Solar for All and IPA websites.

However, the Working Group also urges the IPA to remember that it is significantly more impactful to direct energy efficiency program customers to ILSFA than in the reverse order. Best practice suggests that a home should be efficient before solar is quoted to ensure it isn't overbuilt. Perhaps more importantly, the energy efficiency programs have been identifying, income qualifying, and supporting customers for years and likely have a long list of contacts that might be interested in the ILSFA program.

Ideally, these customers would be contacted by whoever provided their home energy upgrade and asked if they are interested in solar. If so, these customers should be welcomed by the Program Administrator and should be sent directly to an Approved Vendor if there is only one provider for the customer (e.g. if only one company serves a geography or if the customer is in a Bright Community target area). If there are multiple offers, the customer should be connected to each Approved Vendor and a grassroots educator with experience in the residential subprogram.

8.8.6 Home Repair Pilot

Comment: We understand the wisdom of leveraging other federal, state and nonprofit funds to assist program participants with home repairs and upgrades to achieve "solar readiness," but would like to ensure that the Program Administrator has the capacity to

assist participants in seeking outside support before making this a prerequisite for receiving incentives under the Home Repairs Pilot. We note significant turnover in the ILSFA Program Administrator staff and have some concern that potential participants will be excluded from this pilot for failure to obtain outside support.

8.9 Additional Requirements for Illinois Solar for All

Ensuring fidelity of MBE status

Comment: The Illinois Solar for All Working Group encourages the IPA to establish and enforce strict penalties for developers that misuse the MWBE priorities within the program. The IPA and Program Administrator should make clear that developers that conduct this behavior will be censured, suspended from the program, and required to return REC values for relevant projects. In addition, the IPA and Program Administrator should publicize channels for individuals to report alleged misconduct.

Within the Illinois market there have been instances of out of state developers openly sharing plans to establish shell companies as MWBEs with minority hires that would not receive equity. Reports of this conduct should be investigated, and if there is a complaint made, there should be an auditing process to ensure compliance. As more federal and state funding enters the income eligible and environmental justice solar space, there is a greater chance for this type of misconduct from established or novel players. As such, those firms that MWBE provisions are meant to empower and protect must be ensured equitable access and competition. The establishment of additional channels and structures by IPA and the Program Administrator is important, as we've experienced developers view these requirements with a cavalier attitude and as lacking in enforcement.

8.10 Application process

8.10.3.2 Determining Income Eligibility

Comment: Having worked with this program for more than five years, as Grassroots Educators, advocates, and vendors, the Working Group urges the IPA to allow potential customers in both the community solar and the residential small and large subprograms to income qualify via proof of residence in low income or environmental justice communities or via a formal self-attestation affidavit. We understand and also hold concerns about the fraudulent use of public funds, but have come to believe that the likelihood of fraud is low, can be reduced via use of an affidavit with strong warnings against abuse, and is far outweighed by the benefits.

The Grassroots Educators in our group can attest to the difficulties households are having even with the income verification process that Elevate has set up on the ILSFA website. Although it may seem easy to those of us on "this side" of the process, we have personally had to help many folks through verification via multiple emails, phone calls, and check-ins with both Elevate and the customers. We suspect that some people were confused by all the information on the web pages, perhaps didn't want to admit to their

confusion and so gave up on the process. We also note that the list of income eligible programs is not comprehensive and only learned this after significant time trying to help a customer verify via a credit report when she was actually in a qualifying program. Finally, Elevate's verification process does not allow for verification via tax returns, which as educators we heard is preferable over waiting for a credit report.

We also agree with the JSP that the current verification process is particularly burdensome due to the requirement on the Certification and Consent Form/BIF that every individual resident in a household 18 years of age or older must provide income details, date of birth, and accompanying documentation. These requirements have also delayed and discouraged would-be customers.

At a minimum, the Agency should eliminate the requirement that every member in a household verify their income, simplify the income verification webpages (or create a new easy to use and graphical customer onboarding system), update the list of income eligible programs, and allow customers in low income and EJ communities to verify via proof of residence.

8.15 Grassroots Education Funding

Comment: We support compensation of job trainees and community members in Grassroots Education public presentation, and believe this practice is already allowed by the Agency. We understand that the Agency has limited compensation for such assistance to \$40/hour and only during the nonworking hours of such participants. We encourage the Agency to increase such compensation to at least \$50/hour and allow job trainees and other solar workers, some of whom may be on salary, to earn such compensation during lunchtime hours. This type of input in Grassroots Education events is invaluable and should be better supported by the Agency.

In addition, the Agency should work to ensure that Grassroots Educators are working throughout the state. Many areas of the state do not have Grassroots Educator coverage, putting those communities at a disadvantage. Effective Grassroots Educators can also draw Approved Vendor interest to previously unserved areas.

8.16 Illinois Solar for All Advisory Committee

Comment- While we respect the Agency's desire to have a broad spectrum of representation on the Advisory Committee we feel too much time has been dedicated to educating committee members, with insufficient opportunity to actually advise. It appears that interest among members has waned, perhaps because members feel a lack of opportunity to influence implementation of the IL Solar for All program. Those of us who advocated for the creation of an advisory council have been quite disappointed and seek more focused subcommittees that would address specific issues such as the lack of Approved Vendor participation and ongoing project review challenges.