

From: [REDACTED]
To: [IPA.ContactUs](#)
Cc: [REDACTED]
Subject: [External] AES Clean Energy – Stakeholder Feedback on EAS Assessment
Date: Wednesday, April 10, 2024 4:54:42 PM
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Hello,

Please see my responses and comments regarding the EAS assessment in red below. Traditional Community Solar is the focus of our comments. Please keep these responses anonymous. Thank you.

Responses to Questions for Stakeholder Feedback:

- What aspects of the proposed EAS assessment plan do you think will be effective at assessing the EAS and which ones do you believe need improvement?
 - I understand the desire to collect a wide variety of data to build your baseline for assessment. However, the amount of data requested is crossing into invasive territory, and it's clear all of this is for the "on paper" version of program success rather than real tangible success, which should be defined as increasing access to renewables for as many people as possible.
 - Even from this first year of implementation we have faced pushback from project workforce and associated companies regarding the sensitive nature of the information requested, and the level of burden associated, and I cannot see how all of these reports and data collection is moving any needle of any kind – the only aspect here potentially making a difference is the MES 10% EEP requirement, none of the reporting or data collection is actually *changing* anything.
 - The Program should focus on implementing as much reliable renewable energy as possible and therefore lowering barriers to entry and incentivizing that goal rather than increasing the level of difficulty to be successful (put solar on the ground) in this program. If you look at majority of the reporting/compliance requirements, most of them benefit the program rather than the community members the program is supposed to serve.
 - This could be done by using a portion of application fees to subsidize LMI costs as subscriber management organizations charge more for LMI so subsidizing that cost would directly increase the number of LMI consumers who have access to solar.
 - The program could have a sliding scale for REC prices where the highest prices are in the most disadvantaged communities/communities with the

least access to affordable renewable energy to encourage development in those areas.

- The waitlist scoring could be adjusted to score AVs based on where they are installing the solar and/or direct community benefits (such as partnering with a local org to install a community garden under the panels or hiring a local company for veg maintenance) rather than components like interconnection queue positions as those have no benefit to the IL community members.
 - There should be a liability clause releasing AVs from their liability and collateral if an agrivoltaics contractor does not uphold their end of the contract. Developers commonly avoid agrivoltaics as it's hard to trust a farmer will adhere to all requirements for the full 20 years and AVs don't want to take on the risk of losing their collateral and entire contract for a small waitlist point booster. If implementing agrivoltaics and other sustainability initiatives was a true priority then the program would not put so much risk on falling short of said commitments and would grant flexibility. Instead of losing your contract and collateral, an AV should have an increased REC price for agrivoltaics and if that commitment ever falls through/is not in compliance, the REC contract should be amended to provide the non-agrivoltaics REC price. The program is operating off of extremes and forcing AVs out by harsh compliance rules BUT if the goal is to increase access to solar as it should be, then the program should do everything they can to help push that goal forward rather than focus on ways to collect collateral. The program has more rules and narrative on how you can fail rather than guidance on how the program will work with you to increase access to solar.
- AVs are incentivized to go through IL Shines by the REC prices. 1) those REC prices are declining, forcing AVs to weigh the costs/toll associated with the WIDE range of program compliance and reporting requirements. Past REC prices made it a clear decision to participate in the program, current REC prices are making that decision more difficult as the program also comes with more risk, more costs, and longer development periods and 2) Designees and contractors do not get any benefit from working with IL Shines projects. Therefore, if we push them too far, they will simply not participate in IL Shines projects and then the entire program will suffer when AVs cannot find contractors or designees who are willing to adhere to all IL Shines requirements.
- How can the assessment plan be refined to better capture the diverse experiences and perspectives of stakeholders, including EEPs and EECs?
 - Anonymous surveys should be provided to everyone that is documented as associated with the IL Shines program and then there should be a report/presentation by program admin regarding the responses and how the program admin will address all concerns. No one will enjoy another data

collection request if there is no transparency on how admin will respond to the submissions/what they will do with the newfound data.

- What additional methodologies or data points do you think should be considered to enhance the comprehensiveness and accuracy of the assessment?
 - The mid-year MES report should be replaced with a reminder email to be in compliance – all of the data in those reports is tentative and therefore there's no reason in submitting it.
 - The workforce portal is a great tool. However, we have experienced workforce members not wanting to use it because they view it as submitting their personal information to a black hole for an agency they aren't familiar with and they have no idea where their personal information is going, what its being used for, who will see it, who may contact them after registering in the portal, what their employer will think if they find out they're registered on a job board, etc. It would be helpful if the program admin/IPA provided more clarity and assurance in a format that is made for potential workforce/people not currently operating within the program. Furthermore, if not already, there should be an option to keep your information hidden if you want to register in the portal but not be listed in the portal for non-admin member to see. That way we could at least say no one outside of program admin will be able to find you in the portal.
 - Admin/the IPA should recognize that the reporting and compliance requirements within the program are going up while the value of the incentive to participate in this program is going down. There are already frequent conversations amongst AVs "if the juice is worth the squeeze" so to speak, because our end goal is to provide renewable resources to as many people as possible and the burdens associated with this program is getting to the point where it is slowing down the development these facilities. The program requirements reach far and beyond AVs, and program admin/the IPA should have a full understanding of the cascading impacts.
- What specific metrics or data points should be prioritized when evaluating the success of the EAS in promoting equity and inclusion? What baseline should the Agency use to assess the effectiveness of the EAS?
 - Environmental health/sustainability should be included in the EAS. For the benefit of IL as a whole, but especially EJ communities, a pollinator garden/native/soil health seeding should be a requirement for all projects rather than a bonus add-on. To allow flexibility, perhaps the threshold is 80% or more of vegetation must be native and/or pollinator and/or species proven to increase soil health in that region. It's very reasonable for developers to take on this additional cost in most cases, but in case it is not, perhaps there is a threshold, for example "if utilizing native/pollinator/soil health seed mixes costs 2.5+ times the cost of typical vegetation or more then the AV should provide documentation of this and will not be penalized for forgoing the pollinator garden"
- How can the assessment process be made more transparent and inclusive to ensure that all stakeholders have the opportunity to contribute their insights and feedback?

- An email specifically dedicated for feedback should be created. There should be quarterly presentations by admin showcasing the feedback and how admin will address it. AVs are required to submit 6+ reports per project per year in addition to several other data collection efforts, so I think asking admin to assess stakeholder feedback in a transparent way 4 times a year is reasonable. In addition, if we can see admin is effectively addressing feedback, program participants will be more willing to provide said feedback which will help the success of the program.

Comments:

- Race/ethnicity/gender data should not be included in the MES Compliance Plans as AVs have no way of knowing the race/ethnicity/gender of future employees and it feels uncomfortable and potentially biased to make a proposed plan of who to hire categorized by race/ethnicity/gender.
- If we do now know how large our project workforce is at the beginning of a program year, we do not know how many EEPs we need to hire. Asking how many EEPs we will employ so early when the most common response will be “as many as we need to be in compliance” is really unnecessary and not helpful to the IPA.
 - Furthermore, the mid-year MES check in is just as “in the air” as requesting the number of EEPs we will hire before we know our project workforce size. An email from admin reminding us to meet compliance by the end of the program year will be just as effective and less time consuming for both admin and the AVs.
- I understand the desire to collect demographic data in year-end reports to assess the data, I just wanted to emphasize the importance of this information being optional as members of project workforce are already disclosing sensitive personal information and even in the first year of this implementation there has been pushback and expressed discomfort while collecting the baseline minimum required information so adding to that list will not be welcomed lightly.
- The Energy Workforce Equity Portal is a great tool, but I wanted to share that for larger companies, we are often limited to working with companies that have been vetted and listed as an approved vendor. In addition, the request is often sent out to bid and companies/existing teams reply rather than seeking individuals and building a new team via individuals listed on the portal. I just wanted to provide additional information for how the portal may be used.
- Regarding “Illinois Shines (in addition to MES and EEC collections mentioned above): ○ Annual reporting of workforce diversity data, job training graduate hiring, foster care system enrollment, former incarceration, and residency geographic data from Approved Vendors’ and Designees’ project workforce” – I want to emphasize the more data collection required means more work on contractors (since they need to provide us AVs with the data). If we push the contractors too far they will simply not work with AVs who are operating within IL shines. The only incentive for all the extra reporting and compliance standards are the REC prices (which are declining) and contractors do not get this incentive so they have no incentive to work with us/within this program and if we push them too far then we will only jeopardize the entire IL Shines program by limiting

the amount of companies who will contribute to these projects.

- If we are already providing a wide range of data and we only have access to geographic data of the workforce if they qualify as an EEP via residence, the additional geographic data collection should not be included/requested.
- The program is asking individuals for their home address, personal childhood experiences (and usually foster care is not a positive one), personal legal history, geographic data, gender data, race data, and ethnicity data – please consider how invasive this is and how difficult it is to obtain this data when it in no way benefits the person who is disclosing the data. The only data request that feels 100% reasonable is the job training data.

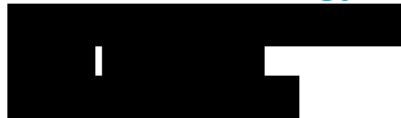
Thank you for your time and have a lovely day,



Breanna Plucinski

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AES Clean Energy



Please know I honor and respect boundaries around work and personal time, wellbeing, and caretaking. Should you receive correspondence from me during an off-time, please wait to respond until you are next working or available.