

**RESPONSE TO STAKEHOLDER FEEDBACK REQUEST - EQUITY  
ACCOUNTABILITY SYSTEM ASSESSMENT ON BEHALF OF THE SOLAR ENERGY  
INDUSTRIES ASSOCIATION, COALITION FOR COMMUNITY SOLAR ACCESS,  
AND ILLINOIS SOLAR ENERGY ASSOCIATION**

**April 10, 2024**

The Solar Energy Industries Association, Coalition for Community Solar Access, and Illinois Solar Energy Association (collectively the “Joint Solar Parties” or “JSP”) appreciate the opportunity to respond to the Illinois Power Agency’s (the “IPA”) request for stakeholder feedback on the Equity Accountability System Assessment (EAS).

**Introduction**

The Joint Solar Parties values the opportunity to comment on the Equity Accountability System and support the robust collection of data to ensure a complete analysis of Illinois’ efforts to ensure a strong, diverse, equitable, and growing solar industry. The companies that make the trade associations that comprise the JSP have been working diligently over the last 10 months to meet the Minimum Equity Standard (MES) of 10% Equity Eligible Persons (EEPs) in our project workforces for the 2023-2024 delivery year. We offer a unique perspective on the MES and thus on the questions that the Equity Accountability System (EAS) data-driven review should address. While the data itself will drive the ultimate conclusions, the conclusions and lessons learned or next steps will be far stronger with the right questions driving the analysis.

The EAS’s data-driven analysis of qualitative and quantitative inputs provides a unique opportunity to measure the impact of the MES and how much the solar industry can achieve and the State of Illinois can benefit from the MES.

As an initial matter, the Joint Solar Parties note that the EAS should not just impact the approach of the IPA. While the specific compliance requirements of statute are the responsibility of the solar industry and the MES is administered by the IPA, agencies from DCEO to IDOL and DCFS (to say nothing of local governments and community groups) and beyond have important roles to play in not just the hiring of EEPs but also training, awareness, and connections. We urge the Agency to not only analyze and make recommendations regarding the performance of the solar industry but also how intergovernmental cooperation and efforts by specific agencies and other organizations, as well as the grantee job-training organizations, play a role in raising EEP awareness of the opportunities in the solar industry and providing the job-training and job-connecting programs to allow the MES to achieve its broadest goals.

In addition, the Joint Solar Parties urge the IPA to consider feedback from industry and other stakeholders after the end of the June 1, 2023-May 31, 2024 compliance year ends so the solar

industry and other stakeholders have the experience of a full compliance year. It's also difficult to evaluate the EAS before a full compliance year has finished; as described below it may take multiple cycles to get enough data to make fuller recommendations but it is challenging to identify all barriers or concerns through data before the full year has ended.

### **Questions from the IPA for Stakeholder Feedback**

1. 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?

#### **RESPONSE:**

- a. Objectives of the Assessment
  - i. The focus of the Assessment should be on the Illinois Shines program as well as Illinois Solar for All. Both these programs engage in proactive community engagement to reach and exceed numerical goals. Actively work with community-based organizations to hold informational events, located in Equity Investment Eligible Communities, reimburse community-based organizations for outreach. Utilize trusted community leaders and subject matter experts in setting up these events. Follow best practices by setting up an outreach budget to provide for any associated cost to hold and support these events.
  - ii. The assessment should identify where other state agencies, local governments, and other organizations can fill gaps in EEP identification, awareness, and training.
- b. Data Collection Scope of the Assessment:
  - i. MES
    1. Percentage of EEPs that are qualifying based on being a graduate of the foster care system or are formerly incarcerated.
    2. Job training program graduate data and identification of short- and long-term potential for additional graduates, taking into account geographic location of the training programs.
    3. Number of training programs held by FEJA and CEJA qualified training entities in the Assessment year. Number of graduates of these training programs. Number of these training graduates that have been registered in EEP portal.
    4. Barriers that are preventing companies from gathering demographic data from vendors that are not Designees or Approved Vendors, including verification of employment information (full time, part time, contractor, seasonal/temporary) and demographic information of members of the project workforce employed, working as independent contractors for, or otherwise

retained by non-Designee or Approved Vendor vendors of an Approved Vendor or Designee

5. Number of waivers that have been submitted and the number of waivers that have been approved by the IPA.
  6. Effectiveness of the steps required to obtain a waiver and an assessment of whether the waiver scoring process is driving the intended outcomes.
- ii. Equity Eligible Contractors
    1. Interview EECs and EEPs to determine what hurdles EEPs face in becoming EECs or to connect with job opportunities.
      - a. Determine why there aren't more currently registered EECs.
      - b. Highlight the skillsets of EECs operating in different regions of the state and identify the gap (if any) between EECs offering services in critical areas of the development and construction cycle compared to demand from ABP systems. This information might inform recommendations regarding location and scope of DCEO-funded training programs.
  - c. Energy Workforce Equity Portal
    - i. Ensure FEJA job training graduates are registering as EEPs through the Equity Portal. Assessment of percentage of training graduates from qualified programs in a given year that have registered with Equity Portal.
    - ii. Number of EEPs that have interviewed, been offered, and/or secured a job through the Equity Portal.
    - iii. Assessment of the self-identified skillsets or preferred careers of EEPs who registered for the EEP Portal, including those registered as job-seekers
2. How can the assessment plan be refined to better capture the diverse experiences and perspectives of stakeholders, including EEPs and EECs?

**RESPONSE:**

- a. Hold regularly scheduled feedback in-person sessions inviting EEPs, EECs, AVs, community-based organizations and other stakeholders, incorporate feedback and identify barriers to patriation by EEPs and EECs. Follow best community engagement practices and reimburse community-based organization representatives for participation.
- b. Determine the gaps in EEC training and recruitment and the role that the IPA and other state agencies or governments can play in closing those gaps.
- c. Evaluate the effectiveness of the mentoring programs using qualitative data from EEP owners of EECs and non-EEC Approved Vendors.

3. What additional methodologies or data points do you think should be considered to enhance the comprehensiveness and accuracy of the assessment?

**RESPONSE:**

- a. The IPA should determine barriers to identifying all EEPs that qualify on the basis of previous incarceration or participation in the foster-care system and publicizing opportunities to the same group.
  - b. Assessing the number of EEPs looking for jobs through the Equity Portal, number of jobs posted on the Equity Portal, and number of trainings offered for CEJA and FEJA job training programs, and the number of graduates from CEJA and FEJA job training programs.
  - c. Number of graduates that are coming out of the FEJA job training programs monthly, each year, and overall.
    - i. Survey organizations that are still providing FEJA job training programs.
    - ii. Training grantees should report to the IPA or DCEO many students they are training every year and what they were trained in.
  - d. On a voluntary and confidential basis, gather information from AV HR teams, including how a broad range of Approved Vendors in different sectors attempt to identify, recruit, and integrate EEPs.
  - e. Include a customer/stakeholder satisfaction component to the assessment, especially from EEPs that voluntarily and confidentially describe how they became aware of opportunities in the solar industry and their pathway to obtaining their role(s).
4. What specific metrics or data points should be prioritized when evaluating the success of the EAS in promoting equity and inclusion?

**RESPONSE:**

- a. Aggregate data about EEPs based on race, ethnicity, geographic location, educational background, previous income level prior to entering the solar industry, and the means by which they qualify as an EEP.
- b. How many job training graduates from the FEJA programs have been registered into the EEP portal? What percentage of FEJA job training graduates are registered in the Equity Portal?

5. What baseline should the Agency use to assess the effectiveness of the EAS?

**RESPONSE:** The first few years of data collection should be seen primarily as creating a baseline and identifying barriers. From there, it is possible to assess current expectations and whether the statutory goals are meeting legislative intent or broader goals shared between the solar industry and the State of Illinois.

6. 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?

**RESPONSE:**

- a. Informal, voluntary and confidential sessions should be held to have an open discussion on the EAS. Participants should include EECs, EEPs, developers and construction subcontractors.
  - b. Set up an advisory group of local governments and community-based organizations and other stakeholders to report on IPA progress, establish accountability, incorporate feedback, and identify barriers to patriation by EEPs and EECs. Follow best community engagement practices and reimburse community-based organization representatives for participation.
7. Are there any other sources of data or examples of best practices that the Agency should review in order to ensure a successful assessment? For example, successful equity programs or assessments of equity programs at the federal, state, or city level (not limited to Illinois).

**RESPONSE:**

- a. California Public Utilities Commission (CPUC) Disadvantaged Communities Advisory Group Equity Framework, [CPUC Equity Framework](#)
- b. The California Energy Efficiency Coordinating Committee (CAEECC) Equity Metrics Working Group, [Metrics Working Group](#)

**ADDITIONAL FEEDBACK:**

The Joint Solar Parties are strong supporters of equitable opportunities for EEPs and the member companies of the trade associations that comprise the Joint Solar Parties strive to meet and exceed the MES. However, several issues with MES implementation have been revealed that the JSP would like to suggest should be addressed in a data-based evaluation such as the EAS:

1. CEJA job training programs have not been deployed yet, DCEO is still working to launch these programs. In the absence of the CEJA job training programs, EEP-qualifying CEJA DCEO programs are not producing EEP eligible graduates. The reduced supply of easily identifiable and solar-trained EEPs should be evaluated as part of the EAS. The EAS could be utilized to track, record and report on the existing training programs held and the number of qualified training graduates that have come out of the programs annually.
2. Foster care alumni are a subset of EEPs that are currently difficult to identify and to recruit and identify. The EAS should consider data about prevalence of EEPs qualifying based on participation in the foster care system and how to better identify, publicize the opportunities in the solar industry to, and ultimately recruit for jobs from that segment.
3. Most of the FEJA job training programs are located in the Chicagoland area, making it extremely difficult to find qualified graduates in other regions of the state. A large amount of solar development is happening in southern and central Illinois which creates a challenge in getting FEJA job training graduates to those parts of the state. The EAS should evaluate the challenges created by geographic distribution of job training graduates and EIECs.

4. If the MES is going to continue to require identification by name of EEPs within an Approved Vendor or Designee's project workforce, the EAS should evaluate the impact on self-reporting of bases for MES status to employers given that doing so might require disclosure of highly personal information (incarceration history or participation in the foster care system) or disclosure of personally identifiable information such as driver's licenses or mortgages that establish residence.
5. Currently, construction subcontractors cannot report their own project workforce numbers, since they are unable to register as Designees because they do not have direct contact with customers. The EAS should consider whether reporting could be improved and streamlined if non-Approved Vendors and non-Designees could register for the limited purpose of separately obtaining EEC status or separately demonstrating MES compliance. As an example, the EAS should evaluate the benefits of allowing construction subcontractors that do not qualify as Designees (for instance because they work exclusively on community solar and thus do not directly interact with customers) to undertake such registration and reporting..
6. The EEP certification email from Smartsheet does not list the EEP's name. This makes it difficult to track EEPs within an Approved Vendor's workforce. The EAS should consider as part of the satisfaction survey the burden(s) placed on EEPs to keep adequate records to ensure that EEPs are counted toward MES compliance.