



Illinois Solar for All Evaluation Request for Stakeholder Feedback

December 2, 2024

Background

The Illinois Power Agency (“IPA” or “Agency”) is seeking stakeholder input and feedback on the scope of the evaluation of the Illinois Solar for All Program (“ILSFA”). Section 1-56(b)(6) of the Illinois Power Agency Act states in part:

At least every 2 years, the Agency shall select an independent evaluator to review and report on the Illinois Solar for All Program and the performance of the third-party program administrator of the Illinois Solar for All Program. The evaluation shall be based on objective criteria developed through a stakeholder process. The process shall include feedback and participation from Illinois Solar for All Program stakeholders, including participants and organizations in environmental justice and historically underserved communities. The report shall include a summary of the evaluation of the Illinois Solar for All Program based on the stakeholder developed objective criteria.

The Program Year 4 (2021-2022) Annual Evaluation Report was issued in July 2024.¹ The Program Year 5 (2022-2023) annual evaluation report will be released in early 2025, and the Program Year 6 (2023-2024) annual evaluation report will be released by summer 2025. A mid-year report, covering barriers to ILSFA Residential Solar uptake, was also released in January 2024, with prospective mid-year reports considering income verification challenges as well as Grassroots Education efficacy in development. The full list of current and future Illinois Solar for All Evaluation Reports can be found at <https://www.illinoissfa.com/evaluation-reports/>.

As the Agency begins the process of selecting an independent evaluator for ILSFA for the next cycle of evaluations, the specific topics for which the Agency is seeking input from stakeholders include:

- additional “objective criteria,”
- design of the evaluation plan, and
- any other considerations about the evaluation of Illinois Solar for All.

This input will be incorporated into the upcoming Request for Qualifications/Request for Proposals to select an independent evaluator targeted for early 2025.²

¹ Illinois Solar for All Program Years run from June 1 to May 31 of the following calendar year.

² This selection process for the independent evaluator is expressly exempted from the Illinois Procurement Code (see 20 ILCS 3855/1-56(f)), rather it is conducted through a two-step process of first issuing a Request for Qualifications and then inviting qualified firms to respond to a Request for Proposals. This is the same process as is used by the Agency to select planning consultants, procurement administrators, and program administrators.

Responses to this Request for Stakeholder Feedback are due to the IPA by Friday, December 20, 2024. All written responses must be emailed to the IPA at IPA.ILSFA@illinois.gov with the subject “[*Responder’s Name*] – ILSFA Evaluation Feedback Request.”

The IPA will publish responses on the websites of both the [Illinois Solar for All Program](#) and the [Illinois Power Agency](#). Should a commenter seek to designate any portion of its response as confidential and proprietary, that commenter should provide both public and redacted versions of its comments. Independent of that designation, if the Agency or the Program Administrator determines that a response contains confidential information that should not be disclosed, the IPA reserves the right to provide its own redactions.

The Agency will also host an Illinois Solar for All Evaluation Stakeholder Feedback Session on Monday, December 16, 2024, from 12 p.m.–1 p.m. CT. This is an additional opportunity for Illinois Solar for All Program stakeholders, including participants and organizations in environmental justice and historically underserved communities, to offer input on the criteria used for the next evaluation of the program.

The feedback session will be conducted virtually over Zoom and attendees must register to participate in the session. A recording of the session will be made available on the IPA website following the live session.

Illinois Solar for All Evaluation Stakeholder Feedback Session

Monday, December 16, 2024; 12 p.m.–1 p.m. CT

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Proposed Approach

The Agency believes the Program evaluation reports should be tools for both the presentation of metrics and to provide comprehensive snapshots and analyses for a program striving to provide equitable access to the benefits of Illinois' growing solar market. State income-eligible solar programs nationwide are expanding and improving in their efforts to provide greater access to solar systems to low and moderate-income communities. As a component of this Program's evaluation, it should also analyze the Program in comparison to other state low- and moderate-income solar programs nationwide to look for opportunities to improve as well.

The Agency proposes to maintain the current reporting structure through the issuance of a mid-year and annual report for the next two program years. The annual reports will focus on a single program year and include metrics, analysis, and program improvement recommendations, along with an accompanying summary report that condenses key metrics and recommendations. The Mid-year Reports will be narrower in focus to provide targeted pertinent analysis to the Agency, stakeholders, and the public. For example, a previous mid-year report focused on barriers to ILSFA Residential Solar uptake, while mid-year reports under development are looking at income verification challenges as well as Grassroots Education efficacy.

The Agency also recognizes that there has been a relative lag between the end of each program year and the issuance of associated evaluation reports – this is actively focused on in an attempt to shorten the lag time. The evaluation report for Program Year 6 (June 2023 through May 2024) is scheduled to be released by summer 2025 and through the selection process for an evaluator that will be conducted in the first half of 2025, the Agency seeks to have an evaluator in place who can produce an evaluation report of Program Year 7 (June 2024 through May 2025) in early 2026. Going forward, the Agency is evaluating opportunities to implement a structured schedule for the issuance of evaluation reports in approximately 6 to 9 months after the end of program year.

The Agency proposes inclusion of those elements outlined in Appendix A in the annual reports. Stakeholder feedback on additional elements for inclusion in ILSFA evaluation is welcomed.

Stakeholder Feedback Questions

1. Does the proposed evaluation plan of developing one or two brief, focused mid-year reports, with a comprehensive year-end report and summary sufficiently balance the need to comprehensively evaluate the program and the need to provide time in between evaluations to implement recommendations and assess results?
 - a. Considering the mid-year reports would be limited to between 1 and 2 topics per report per year, what topics would stakeholders like to see addressed in the focused mid-year report(s)?
2. The IPA is committed to ensuring access to the growing clean energy economy for communities and residents that have historically been excluded from economic opportunities with the energy sector. Illinois Solar for All strives to ensure these benefits and opportunities are reaching income-eligible households, disadvantaged communities, and Illinois job trainees.

What metrics and indicators should be evaluated to assess the Program's incorporation of diversity, equity, and inclusion best practices into the Program's design and implementation?

3. The ILSFA evaluation reports should be useful and accessible to stakeholders with a variety of interests and perspectives of ILSFA. What audiences will use these evaluation reports? What particular information would be useful for them, and in what format(s)?
4. Given that data available for Illinois Shines projects would not include demographic information, is there analysis of ILSFA system metrics against Illinois Shines system metrics that would be useful for stakeholders?
5. What additional objective criteria should be evaluated?

Note: previous reviews focused on small residential (completed), income verification (in progress), and grassroots education (in progress).

Next Steps

Stakeholder feedback on these topics will be considered while developing guidelines for the Illinois Solar for All evaluation reports, to be included in the upcoming RFQ/RFP process occurring in early 2025.

Appendix A

The Agency proposes inclusion of the following elements in the comprehensive annual reports. Stakeholder feedback on additional elements for inclusion in ILSFA evaluation is welcomed.

Per Section 1-56(b)(6) of the IPA Act, the evaluation must evaluate the following:

- Number of projects installed
- Total installed capacity in kilowatts
- Average cost per kilowatt of installed capacity
- Number of jobs or job opportunities created
- Economic, social, and environmental benefits created
- Total administrative costs

In addition, the IPA proposes to further analyze the metrics above by the following factors:

- By sub-program (residential distributed generation, Non-profit/Public Facilities, Community Solar)
- For DG and Community Solar, by owners and renters
- By business model (e.g., purchase, lease, power purchase agreement)
- By geographic regions including, but not limited to Environmental Justice communities, Low-income communities, rural, suburban, and urban areas
- Other socioeconomic or demographic characteristics proposed by the Evaluator and/or stakeholders

Economic, social, and environmental benefits should be considered by evaluating:

- Impact of the solar installation or community solar subscription on the energy costs of participants
- Impact of factors outside of Illinois on the program (e.g., supply chain disruptions, tariffs, reduction of federal tax credits)
- Correlation between locations of installations and where job trainees live
- Percent of domestically produced panels
- Non-energy benefits including impact on community awareness or other measures for well-being
- Impact on reliability of the electric distribution system
- CO₂ reductions
- Energy and emissions equivalencies (e.g., homes powered, fossil fuel displacement equivalencies)
- Other environmental benefits proposed by the evaluator and/or stakeholders

Job and job opportunities created should be further evaluated by:

- Construction/installation jobs created

- Jobs created in other parts of the solar workforce (e.g., sales, system design, general construction/trades)
- Permanent versus temporary jobs created
- Percent of installation hours by qualified job trainees
- Supply chain jobs created
- Induced jobs created
- Average wages/salaries
- Effectiveness of coordination of job training providers and Approved Vendors/installers

In addition to the statutorily required metrics, the evaluation should also consider the following:

- Performance Metrics
 - Incentive dollars awarded
 - All-in average cost per kilowatt-hour of expected production
 - Housing stock issues that prevented participation in the Distributed Generation Program
 - Rate of projects that are not completed (and contributing factors)
 - Complaints/participant satisfaction with Approved Vendors
 - Average savings by business model types
- Evaluation of Program Administrator's performance
 - Overall assessment of how the Program Administrator is managing of day-to-day program processes
 - Analysis of how the Program Administrator has
 - The success of outreach undertaken by the Program Administrator, including engagement with community groups and stakeholders through both stakeholder sessions and comments received
 - Program Administrator's work with Approved Vendors to educate them on criteria and measurements of success as well as how the Program Administrator worked with struggling or non-compliant Approve Vendors to inform and support their path back to compliance
 - Surveys of Approved Vendors regarding their experience with the Program Administrator
 - Effectiveness of grassroots education campaigns and impact on increased uptake of solar projects
 - Coordination efforts undertaken by the Program Administrator to connect people with both job training and solar opportunities

Other topics the Agency intends to include in the evaluation plan:

- 1-4 unit distributed generation participation (including barriers for Approved Vendors and participants)
- Analysis of program incorporation of diversity, equity, and inclusion
- Income distribution of ILSFA participations within the 80% AMI standard.
- Actual savings achieved compared to expected savings.
- Income verification method use

- Impact of ILSFA job training requirements
- Grassroots education outcomes
- Analysis of the implementation of energy sovereignty incentives