

To: IL Power Agency, IPA.ILSFA@illinois.gov

From: Signatories found below

Date: December 20, 2024

RE: Members of the IL Solar for All Working Group-ILSFA Evaluation Feedback Request

Please find our comments below. In some cases, we understand that the data we suggest collecting is not currently available but should be considered in future iterations of program requirements.

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?

Answer: Yes, we support this approach with the understanding that it allows for particular evaluator staff to focus on chosen issues and to release mid-year reports sooner than the year-end report.

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)?

Answer:

- Importance of energy sovereignty (ES) projects to consumers and Approved Vendors
- Are ES customers saving more than non-ES customers?
- Savings of electrified, weatherized and energy efficient homes with solar vs. savings of households with solar alone
- Remaining AV portal & application processing issues
- What would it take to draw more AVs from IL Shines into ILSFA?
- Effectiveness of Program Administrator's customer service tools
- Importance of household income on participation levels-are projects primarily going to households with higher incomes?
- Ability of grassroots educators to serve as navigators guiding potential customers through the program vs. a strictly educational and "hand-off" role.
- Why has participation by AVs in the community solar subprogram declined?
- Is income verification driving would-be customers away?
- Could income self-attestation work in Illinois as it does in other states?

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?

Answer:

We think it is imperative to develop a plan to collect racial, gender, and income (i.e., low income vs. moderate income) data on the customer participants in the community solar and residential subprograms, and racial data on organizations participating in the nonprofit/public facility subprogram (e.g., control of nonprofit, community served), and suggest this be required in future iterations of the annual report requirements. There should be ample racial, wage, job type, retention, and other data available on CEJA Workforce Network participants collected by the Workforce Hubs, allowing for tracking of people employed on ILSFA projects. It may be time to require ILSFA AVs to collect similar data on employees not tracked by a WF Hub or Illinois Department of Corrections (IDOC) program. It's also important to track customer and AV satisfaction by race and gender, perhaps age and ability as well. This question deserves more time and attention by the Program Administrator and stakeholders.

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)?

Answer: If these evaluations truly take a hard look at the various parts of this Program, they should be helpful to the IPA, the Program Administrator, advocates, and solar industry participants. Please see our answers to the other questions herein regarding what information would be useful.

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?

Answer: We're somewhat confused by the question given the demographic information available per Minimum Equity Standard requirements. Is the Agency noting the different data available regarding program customers? We do note the lack of racial, gender, and age data collection on customers in both programs making it difficult to determine whether there is disparity in who is enjoying the benefits of either program. This raises another concern regarding whether IL Shines vendors are selling systems to households that qualify for an ILSFA system and could receive greater savings over the life of the contract under ILSFA.

5. What additional objective criteria should be evaluated?

Answer:

Program administrator management of application portal

- Response time to AV and AVD requests for information and assistance
- Efficacy of program portal especially accuracy of REC calculations when Energy Sovereignty is in play
- Ability of program portal to accept the documents requested of the AV.

- Ability of disclosure form to accurately capture and calculate data relating to self-purchase projects
- Usability of AV portal - Part 1 document terms in the AV manual sometimes do not match those used in the AV portal
- Redundancy of information requests
- Changes that were implemented in the AV portal over the past program year
- Annual surveys of Approved Vendors regarding their experience with the Program
- Note: Many people don't complete surveys. Can we make this a requirement of the year-end report?
- Effects of Program Administrator frequent staff turnover
- Consistency and clarity in instruction from Program Administrator to AVs and GEs
- Use of ILSFA website and resources therein - who's using it? What webpage resources are most utilized, which are not being used?

Effectiveness of the Program Administrator's customer service & customer tools:

- Effectiveness of website tools and customer service line in helping customers through the process
- Number of solar systems that are paired with electrification, weatherization and EE measures
- Customer & AV satisfaction with stranded customer remedy and escrow process for AVs that do not pass through promised REC

Diversity, Equity & Inclusion Metrics for Program

- Number of installs by type of nonprofit and public institutions getting solar
- Racial data on customers benefiting
- Are 40% of benefits flowing to disadvantaged communities that are marginalized, underserved, and overburdened by pollution in keeping with the Biden Administration's Justice 40 initiative?
- Income levels (i.e., low income vs. moderate) of households receiving solar projects or community solar subscriptions under Program.
- Racial makeup of households with residential projects and community solar subscribers
- Number of installs by type of nonprofit and public facility
- Range of wages & salaries by job type
- Wages of job trainees vs. those who were not trained prior to employment
- Is the list of third party programs for categorical qualification too narrow?

AV Performance/Customer Satisfaction

- Average wait time from Part I residential and NP/PF application submission to energization
- Number of "no cost" residential projects installed
- AV methods for providing "no cost" projects
- For systems with a lease or PPA payment, the range of monthly or annual costs and total contract costs to customer as well as average cost for each of these metrics
- Reasons for disapprovals by Program Administrator

- How far do participants get before dropping off, why do they drop off?
- Average wait time from community solar subscription sign up to utility bill savings

Effective use of public funds

- Number of energy sovereignty projects completed and number of years to transfer of ownership
- REC payments awarded per project, per project type, per AV
- All-in average cost per kilowatt-hour of expected production with and without home repair and upgrade costs.

Respectfully submitted by,

A Just Harvest

ARF Solar

Central Road Energy

Citizens Utility Board

Sustain Rockford

Union of Concerned Scientists

Vote Solar