



2022 Long-Term Renewable Resources Procurement Plan Stakeholder Feedback Workshop

**Afternoon Session
November 18, 2021**

Agenda

- **Morning Session**

- Welcome and Introductions 9:00 – 9:10
- High Level RPS Questions 9:10 – 9:30
- Utility-Scale and Brownfield site procurements 9:30 – 10:05
- Large Customer Self-Direct Program 10:05 – 10:40
- *Break* 10:40 – 10:45
- Diversity, Equity, and Inclusion 10:45 – 11:30
- REC Prices 11:30 – Noon

- **Afternoon Session**

- Welcome and Introductions 1:00 – 1:10
- Adjustable Block Program 1:10 – 2:10
- *Break* 2:10 – 2:15
- Illinois Solar for All Program 2:15 – 3:15
- Consumer Protections 3:15 – 4:00

- **Today's workshops are being recorded and will be available on the IPA website:**

<https://www2.illinois.gov/sites/ipa/Pages/RenewableResourcesWorkshops.aspx>

- **IPA Staff will present on each topic and pause to take comments and questions**
 - **Please use the chat feature to make comments or ask questions**
 - **All participants are on mute, if you wish to speak to clarify a comment or question, please use the raise hand option under "Reactions"**

Workshop Logistics, continued

- **Today's workshops will review questions contained in Requests for Stakeholder Feedback released on November 12**
 - <https://www2.illinois.gov/sites/ipa/Pages/RenewableResourcesWorkshops.aspx>
- **The Agency strongly encourages stakeholders to submit written comments**
- **Written comments due December 3, 2021. Please send to:**
 - IPA.Contactus@illinois.gov

Presenting This Afternoon



- **Anthony Star, Director**
 - **Brian Granahan, Chief Legal Counsel**
 - **Audrey Steinbach, Program Manager, Adjustable Block Program**
 - **Jennifer Schmidt, Program Manager, Illinois Solar for All**
 - **Emily Asbury, Program Associate**
 - **Sharon Johnson, Diversity, Equity, and Inclusion Manager**
 - **Kelly Turner, Deputy Legal Counsel**
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- **Megha Hamal, Communications Manager**
 - **Sarah Duffy, Associate Legal Counsel**

Learn More about the Climate and Equitable Jobs Act

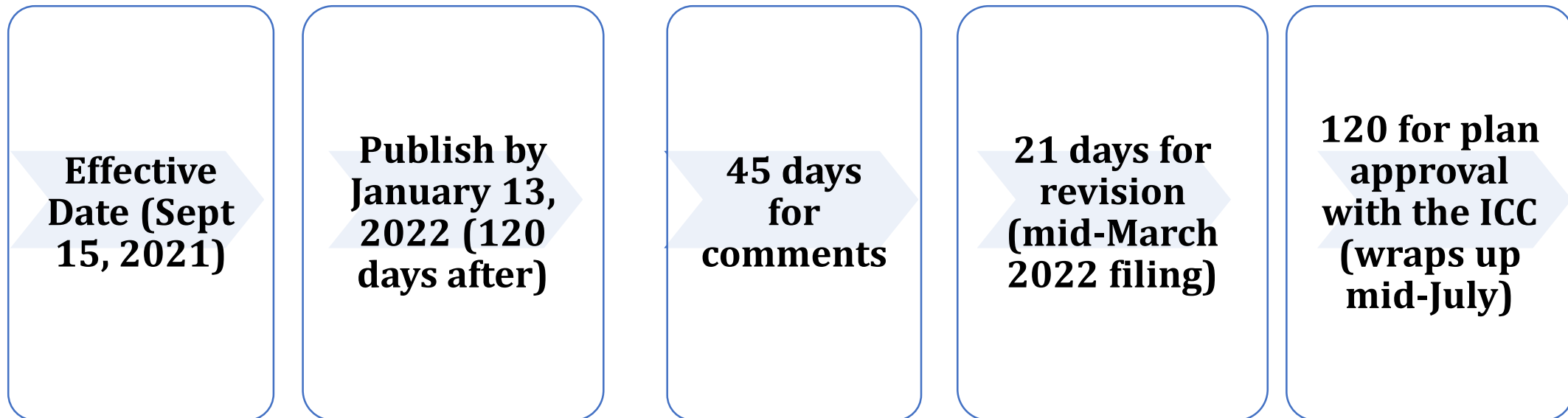


- **IPA Power Hour Webinar 1: *Expansion of the Illinois RPS Under CEJA*, Friday, October 15, 2021**
- **IPA Power Hour Webinar 2: *CEJA's Impact on Adjustable Block Program*, Friday, October 22, 2021**
- **IPA Power Hour Webinar 3: *CEJA's Impact on Illinois Solar for All*, Friday, November 12, 2021**
- **IPA Power Hour Webinar 4: *CEJA's Impact on Utility-Scale Solar and Wind and Brownfield sites*, Friday, November 19, 2021; 12pm-1pm CDT**
- **IPA Power Hour Webinar 5: *Creating a Diverse and Equitable Energy Workforce*, Friday, December 3, 2021; 12pm-1pm CDT**
- **IPA Power Hour Webinar 6: *Decarbonization, from Coal to Renewables*, Friday, December 10, 2021; 12pm-1pm CDT**
- **IPA Power Hour Webinar 7: *Carbon Mitigation Credits and CEJA's Support for At-Risk Nuclear Plants*, Friday, December 17, 2021; 12pm-1pm CDT**
- **For recordings of past IPA Power Hours and to register for upcoming IPA Power Hours:**
 - <https://www2.illinois.gov/sites/ipa/Pages/Events.aspx>

Long-Term Plan Development Timeline



- Initial Long-Term Plan developed in 2017/2018, updated every two years
- First Revised Plan approved in early 2020
- IPA released draft Second Revised Long-Term Plan for public comment on August 16, 2021
 - Plan withdrawn on September 16, 2021, due to provision in P.A. 102-0662 calling for a new plan to be released for public comments in 120 days
- New Plan development timeline:



- Previous Plans available at:
https://www2.illinois.gov/sites/ipa/Pages/Renewable_Resources.aspx

Adjustable Block Program

Annual Block Capacity

1. Long-Term Plan scheduled to be approved July 2022, initial blocks of annual capacity opening in December of 2021, and references to annual blocks of capacity by delivery year, how should the timing of block opening be reconciled?
 - a) Backdate opening of annual blocks to the start of the 2022-2023 delivery year (June 1, 2022)? Or some other way of prorating the timing of annual blocks?
 - b) Are there other approaches for reconciling the timing of block opening?
 - c) For categories with an initial allocation period of two years, is the initial period the 2021-2022 and 2022-2023 delivery years, resulting in the next block opening June 1, 2023?
2. How should Blocks be sized?
 - a) Overall RPS goal is to procure 45 million RECs delivered annually by 2030; ABP share of that is 12.375 million RECs. Should the Agency set even annual total block quantities for the delivery years between 2022 and 2030? Or should block sizes ramp up over time? If a ramp up approach is used, what is a reasonable annual growth rate?
 - b) What would be a reasonable estimate of the size of DG market annually that could be used in setting block sizes?
 - c) Initial block sizes were set by using a standard 16.5% capacity factor. Should a standard capacity factor be maintained, or should it be category specific?
3. What considerations should be made when redistributing uncontracted capacity at the end of a delivery year? Should waitlists be pure first-come first-served or some other process?
4. Should application fees for waitlisted projects be charged when first applying, or only be due once projects come off waitlists?

Open Questions from the withdrawn draft Second Revised Long-Term Plan



5. Co-location of Distributed Generation Systems (Section 6.5.2, pg. 149)

- *How can the Agency ensure that parcels that serve separate residential and agricultural uses are classified properly in terms of co-location?*

6. Community Solar (Section 6.5.3, pg. 150-151)

- *Considering potential cost reductions for community solar providers through methods such as online marketing and enrollment, should small subscriber adders be reduced?*

7. Program Administrator (Section 6.10, pg. 165-166)

- *How can the Agency increase the number of diverse business entities (i.e., minority-owned business, woman-owned business, veteran-owned business, disability-owned business, or small business). Specifically, what are barriers to entry currently observed in the market and how can those barriers be addressed adequately to ensure a more diverse pool of Program participants?*

Open Questions from the withdrawn draft Second Revised Long-Term Plan, continued



8. Technical System Requirements (Section 6.12.1, pg. 168)

- *The Agency is interested in feedback on specific alternatives to signed interconnection agreements for new community solar applications where there may be a long lead time between project application and selection.*

9. Metering Requirements (Section 6.12.2, pg. 170)

- *The Agency is seeking feedback on how the new DC metering standard that was finalized in March 2021 will be applicable and relevant to its programs.*

10. Batches (Section 6.14.1, pg. 178)

- *Should the initial batch size of 100 kW and/or 75% verification level for new minority or woman-owned Approved Vendors be set at a lower level?*

11. Batch Contract Approval (Section 6.14.6, pg. 180)

- *Should the Agency allow circumstances in which collateral from projects withdrawn from the Program can be rolled over to newly applied projects? How should those exceptions be applied?*

Equity Eligible Contractor Category



- **Public Act 102-0662 creates a new category of capacity for Equity Eligible Contractors ("EEC")**
- **The Act requires that the EEC category grow over time to 40% from the initial 10% required for Program reopening.**
 - 12. Over how many years should that increase from 10% to 40% occur?**
 - 13. What mechanisms should be used to ensure that this percentage goal is met?**

Equity Eligible Contractor Category



By allowing only “applicants” who are Equity Eligible Contractors to be eligible for this block, an applicant cannot qualify for this category through having a portion of subcontractors or workforce being Equity Eligible Contractors or persons.

14. Are there alternative interpretations of the law for the Agency to consider, such as qualification through Designees, subcontractors, or a company's workforce?
15. If Designees are permitted to qualify as an EEC, would the EEC category be limited to projects that have both an EEC Designee and Approved Vendor?
 - a. How can the Agency ensure this category is not dominated by a select few qualifying aggregators or firms who, outside of company status, may not otherwise substantially advance equity goals? Should additional requirements be considered?
16. Equity Eligible Contractors may be eligible for an advance payment for a portion of their REC contract. To be eligible for predevelopment capital, what standard for “demonstration of qualification or need” should be considered?
17. For the advance of predevelopment capital, what costs should be considered in determining the amount that could be advanced? Should those costs vary by project type or size? What consequences should result if capital is advanced and then a project fails to energize?
18. Should the Agency cap the share of projects eligible for predevelopment capital? If so, at what level and why?

Community-Driven Community Solar



- *Intended to provide more direct and tangible connection and benefits to the communities which they serve or in which they operate and, additionally, to increase the variety of community solar locations, models, and options in Illinois.*
- The Agency is to develop a selection process that, “maximizes community ownership and community benefits”
 - This process is different from the process for the initial block opening scheduled to start on December 14, 2021
- A selection process requires an initial application period
 - Would 90 days for future delivery years be sufficient?

Community-Driven Community Solar: Primary Criteria

- For project selection, the Agency proposes that each of the following five criteria listed be allocated up to 2 points.
 - *(1) community ownership or community wealth-building;*
 - What does community ownership look like? What different community ownership structures and/or minimum criteria for a project should qualify as community owned.
 - How should community wealth-building be defined? Should the project continuously build wealth in the community? Or is a one-time influx of wealth into the community sufficient? Should there be requirements regarding the recipient(s) of the wealth the project builds?
 - *(2) additional direct and indirect community benefit, beyond project participation as a subscriber, including, but not limited to, economic, environmental, social, cultural, and physical benefits;*
 - How should the community benefits be evaluated and scored, whether direct or indirect? What might minimum requirements for community benefits look like?
 - *(3) meaningful involvement in project organization and development by community members or nonprofit organizations or public entities located in or serving the community;*
 - How should the Agency define meaningful involvement as it relates to project organization and development? What documents may be available that would demonstrate meaningful involvement? How can the Agency verify meaningful involvement?
 - *(4) engagement in project operations and management by nonprofit organizations, public entities, or community members;*
 - How should the Agency define engagement in project operations and management? What documents may be available to demonstrate such engagement, and how can the Agency verify this com
 - *(5) whether a project is developed in response to a site-specific RFP developed by community members or a nonprofit organization or public entity located in or serving the community*

Additional Criteria

- *Selection criteria may also prioritize projects that:*
 - *(1) are developed in collaboration with or to provide complementary opportunities for the Clean Jobs Workforce Network Program, the Illinois Climate Works Preapprenticeship Program, the Returning Residents Clean Jobs Training Program, the Clean Energy Contractor Incubator Program, or the Clean Energy Primes Contractor Accelerator Program;*
 - *(2) increase the diversity of locations of community solar projects in Illinois, including by locating in urban areas and population centers;*
 - *(3) are located in Equity Investment Eligible Communities;*
 - *(4) are not greenfield projects;*
 - *(5) serve only local subscribers;*
 - *(6) have a nameplate capacity that does not exceed 500 kW;*
 - *(7) are developed by an equity eligible contractor; or*
 - *(8) otherwise meaningfully advance the goals of providing more direct and tangible connection and benefits to the communities which they serve or in which they operate and increasing the variety of community solar locations, models, and options in Illinois.*

Additional Criteria Proposal

- 1 point for projects developed in collaborations.
 - What should be minimum scoring, and what standard should be considered for what qualifies as a “collaboration” or “provid[ing] complementary opportunities.”
- Projects will be sorted into four categories based on the development density of the townships in which they are located.
 - The highest density class would get 2 points, the next class 1 points, the third class 0.5 points, and the lowest density class 0 points.
- Projects located in Equity Investment Eligible Communities receive 1 point.
- Projects that do not take agricultural land out of production receive 1 point.
- Projects that only serve subscribers in the same county as the project receive 2 points. If the county population is below 50,000, then subscribers in adjacent counties would also be allowed to meet this commitment.
 - Would not preclude project from enrolling subscribers outside of this area, however those subscribers would not be considered “subscribed shares” for the purpose of calculating REC payments.
 - How long over the life of a community solar project should this requirement be maintained, and how should subscriber turnover be handled?
 - Should smaller community-solar projects such as those under 500 kW have a smaller area allowed for local subscribers, and if so, what would be an appropriate geography.
- Projects under 500 kW (AC) in size would receive 2 points. A project’s size will be determined through including any actual or proposed co-located community solar projects in that size determination.
- 1 point for projects that provide direct and tangible connection and benefits to communities.
 - How should this be evaluated and should benefits be required to last throughout the life of the project.
- Projects developed by Equity Eligible Contractors will be able to submit community solar projects in that dedicated category. No additional points.

Additional Criteria, continued

- Is a minimum score of 6 points for project category qualification sufficient?
- Are there better ways of ensuring sufficient community support for all projects selected through this process?
 - Should the program then open up on a first-come, first-serve basis for projects that score at least, for example, 2 points if there are not initial applications exceeding available capacity? Or should some other prioritization of this capacity be considered?
- Random selection would only be utilized as a tie-breaker for equally scored projects to fill available capacity
 - If only a small amount of capacity remains should project(s) be taken out of scoring order to fill that capacity?

Additional Community-Solar Requirements



- Traditional community solar projects are now subject to the following requirements per P.A. 102-0662:
 - *(2) projects shall have subscriptions of 25 kW or less for at least 50% of the facility's nameplate capacity and the Agency shall price the renewable energy credits with that as a factor;*
 - *(3) projects shall not be colocated with one or more other community renewable generation projects, as defined in the Agency's first revised long-term renewable resources procurement plan approved by the Commission on February 18, 2020, such that the aggregate nameplate capacity exceeds 5,000 kilowatts; and*
 - *(4) projects greater than 2 MW may not apply until after the approval of the Agency's revised Long-Term Renewable Resources Procurement Plan after the effective date of this amendatory Act of the 102nd General Assembly.*
- The Agency is interested in feedback regarding whether these requirements should be applied to community driven community solar projects as well. When providing feedback, please include reasoning as to why these requirements should or should not be applied to systems classified as community driven community solar.

Break

Illinois Solar for All Program

Interaction With Other Funding/Grant Opportunities



- **Public Act 102-0662 creates several new funding opportunities that are external to the Illinois Solar for All Program but could help support projects and participants in the Program. These include the Climate Bank at the Illinois Finance Authority, the Illinois Clean Energy Jobs and Justice Fund, and the Equitable Energy Upgrade Programs.**
 - 1. The boards of these entities could include solar developers who participate in ILSFA. What considerations and protections should be put into place to prevent conflicts of interest?**
 - 2. Should adjustments to REC prices or required savings levels be considered for projects utilizing these programs, similar to the increased savings level currently required for non-profit/public facilities projects that utilize the Investment Tax Credit?**
 - 3. Are there other external funding opportunities which the Agency should account for in establishing ILSFA incentive levels?**

Environmental Justice Communities



- Public Act 102-0662 directs that the environmental justice communities as defined for ILSFA be used in defining the location of “equity investment eligible communities.” Section 8.15 of the current Long-Term Plan details the CalEnviroScreen indicators that were applied to determine the census tracts that would be designated using data from the US EPA’s EJSCREEN tool, which is update yearly. ILSFA’s EJ maps have not been updated (other than through the community self-designation process) since early 2019, which used EJSCREEN data published in 2019, calculated from data collected by the U.S. Environmental Protection Agency between 2014 and 2019.
3. When and how frequently should the environmental justice maps be updated using the most recent EJSCREEN data?

Grassroots Education Funding

- Section 1-56(b)(3) now includes language that specifies that grassroots education funding be used to “assist in community-driven education efforts related to the Illinois Solar for All program, including general energy education, job training program outreach efforts and other activities deemed to be qualified by the Agency,” with the caveats that funds go to “community-based groups and other qualifying organizations” and that “funding shall not be used to support the marketing by solar project development firms and organizations, unless such education provides equal opportunities for all applicable firms and organizations.”
 5. The current model of grassroots education utilizes localized education campaigns conducted by grassroots non-profits familiar to their communities. What types of “other activities” could be funded through community-based groups and other qualifying organizations that could further “community-driven education efforts”?

- Sub-programs have a portion reserved for projects promoting energy sovereignty “through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.”
- This also includes the specification that “local people have control of the project and reap benefits from the project over and above energy bill savings.” Questions related to energy sovereignty for specific sub-programs are asked below. The following are general questions across sub-programs.
 6. What should be a general standard for “ownership? Is it majority ownership, full ownership, or some other standard?
 7. Should requirements for ownership be defined over a specific time period?
 8. How should “providing services to low-income households” be defined and measured? Can the Agency’s current approach of critical service providers used for the non-profit/public facilities sub-program be used as a proxy?
 9. Should REC prices be higher for projects that promote energy sovereignty? What factors should be considered as drivers of higher costs for these projects? What provisions should be included to ensure that the benefits of those higher prices flow through to the project owners?
 10. Are there other provisions that should be considered for projects that promote energy sovereignty such as different project application requirements, collateral requirements, project development timelines, etc.?

Distributed Generation Sub-Program

- Section 1-56 (b)(2)(A)(ii) of the IPA Act instructs the Agency to “make every effort to enable solar providers already participating in the Adjustable Block program [in the small distributed generation block] to easily participate in the [1-4 unit distributed generation] program [...] and vice versa.”
 11. What barriers do developers of small distributed generation projects who participate in only the Adjustable Block Program face that could be reduced to promote their participation in ILSFA?
- The Program Administrator has taken a number of steps to ease access to ILSFA in the past program year, including creating an offers sheet listing standard offers available from ILSFA Approved Vendors, creating a referral process to connect interested potential participants with Approved Vendors, and the option for the potential participant to complete the income verification process with the Program Administrator directly. Although activity in the LIDG sub-program has grown slightly in the past year, this sub-program still needs substantial growth.
 12. What are other ways that ILSFA Approved Vendors can be supported to increase interest in developing ILSFA residential solar projects?
 13. How can Approved Vendors be supported to encourage project development in areas that are currently underserved by ILSFA Approved Vendors?
 14. If recommending changes to REC prices, what specific cost components would need adjustment?
 15. What should ongoing stakeholder engagement/feedback process look like to inform efforts to expand LIDG development?
- Illinois Solar for All has a requirement that incentives deliver tangible economic benefits to eligible low-income participants. In master-metered buildings, program eligibility currently requires the owner to commit to passing along at least 50% of the energy savings to all the tenants, regardless of income levels, and communicate that these benefits are a result from the installation of solar.
 16. How can “tangible economic benefits” be better defined?
 17. What does energy sovereignty look like for multi-family projects?

Non-Profit/Public Facilities Sub-Program



- Public Act 102-0662 of the IPA Act expands the Adjustable Block Program in Section 1-75 (c)(2)(K)(iv) directing the creation of a block dedicated for solar projects installed at public schools, with priorities for projects located within environmental justice communities.
 - 18. Since the Adjustable Block Program will now include a category specifically for public schools should public schools no longer be eligible to participate in ILSFA?
 - 19. Are there types of schools that wouldn't qualify under Section 1-75(c)(2)(K)(iv) that should still be considered eligible for ILSFA?
- Section 1-56 (b)(2)(E) of the IPA Act (as modified by Public Act 102-0662) creates a new sub-program for low-income large multifamily solar projects, with incentives targeting residential buildings with 5 or more units.
 - 20. Should multifamily residential housing be no longer eligible for the Nonprofit/Public Facilities sub-program and only eligible for the new low-income large multifamily solar sub-program?
- Section 8.6.3 of the current Plan requires the organizations that host of Nonprofit/Public Facilities projects to be “a critical service provider for the community,” and provides examples of “youth centers, hospitals, schools, homeless shelters, senior centers, community centers, places of worship, affordable housing providers including public housing sites.” Section 4.2 of the [ILSFA Approved Vendor Manual](#) expands on these examples to a list of over 25 other qualifying non-profit entities, and Approved Vendors have requested the Program Administrator consider other entities as a Critical Service Provider.
 - 21. Should the criteria for critical service providers be refined to include a requirement that the facility demonstrate that it provides a majority of its efforts/activities to low-income participants.
 - 22. Are there changes to the list of critical service providers that should be considered?

Low-Income Community Solar Sub-Program



- **Community-Solar specific energy sovereignty issues**

23. What does community ownership of a community solar project look like?

24. How can the financial risks to communities that come with long term ownership be managed? In particular, costs associated with subscriber acquisition and turnover, subscriber/bill management, and equipment maintenance such as future inverter replacements?

25. What factors should be considered in determining appropriate incentives for projects demonstrating energy ownership?

26. What would individual ownership by a low-income household in a community solar project look like?

27. What benefits constitute “over and above bill savings”?

Equity/Workforce Development

- Section 1-56 (b)(5) of the IPA Act now states that “The third-party administrator’s responsibilities shall also include facilitating placement for graduates of Illinois-based renewable energy-specific job training programs, including the Clean Jobs Workforce Network Program and the Illinois Climate Works Pre-apprenticeship Program administered by the Department of Commerce and Economic Opportunity and programs administered under Section 16-108.12 of the Public Utilities Act. To increase the intake of trainees by participating firms, the administrator shall also develop a web-based clearinghouse for information available to both job training program graduates and firms participating, directly or indirectly, in Illinois solar incentive programs.”
 - 28. How should “facilitating placement” go beyond sharing of information between graduates and potential employers?
 - 29. What are some of the key features a clearinghouse should offer?
 - 30. How can the Program Administrator ensure that trainee and job listings are updated regularly by the appropriate parties?
- Section 1-56 (b)(2) of the IPA Act now states that “The Agency shall make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program.”
 - 31. What should be the definition of “small and emerging businesses”? May businesses be either “small” or “emerging”? At what point is a business no longer “small and emerging”, and how should the Agency track those business-specific changes?
 - 32. What specific barriers are unique or particularly acute to small and emerging businesses?
 - 33. How should small and emerging businesses in low-income and environmental justice communities be specifically targeted for support?
 - 34. If different incentive levels (increased REC prices) are warranted, what methodology should the Agency employ for considering higher small and emerging business incentive levels?

Equity/Workforce Development, continued



- Section 1-56 (b)(2) of the IPA Act now states that “The Agency shall strive to ensure that renewable energy credits procured through the Illinois Solar for All Program and each of its sub-programs are purchased from projects across the breadth of low-income and environmental justice communities in Illinois, including both urban and rural communities, are not concentrated in a few communities, and do not exclude particular low-income or environmental justice communities.”

The Project Selection Protocol as refined for the 2021-2022 program year implemented a Regional Environmental Justice Score point attribute in the Low-Income Community Solar sub-program to prioritize selection of community solar projects in areas where the distribution of selected projects is disproportional to the region’s distribution of environmental justice communities.

35. Previous stakeholder feedback, including that received during the summer of 2021 for the development of the now withdrawn draft Second Revised Plan, suggested the need for stability and sufficient advance notice of changes to the Project Selection Protocol. If the Project Selection Protocol is further updated when should that new Project Selection protocols take effect? Should it be for Program Year 2022-23 (beginning Summer 2022) or Program Year 2023-24 (beginning Summer 2023)?
36. How should the Agency promote development in underserved areas if a sub-programs is not oversubscribed and thus requiring use of the Project Selection Protocol and instead the sub-program is accepting projects on a first-come, first-served basis?

Consumer Protections

- The Agency's Initial Long-Term Plan as approved by the ICC in Docket 17-0838 included the development of consumer protection guidelines with stakeholder input.
- ABP and ILSFA marketing guidelines, program brochures, and standardized disclosures were developed through a stakeholder process following the finalization of the Initial Long-Term Plan.
- Marketing guidelines and materials have been updated through additional stakeholder processes.
- Public Act 102-0662 specifies the Agency's responsibilities related to consumer protection.

Vendor/Designee Discipline

Section 1-75(c)(1)M)(i) directs the Agency to establish a registration process for entities seeking to qualify for program-administered incentive funding, maintain a list of approved entities on each program website, and authorizes the Agency to revoke an Approved Vendor's ability to receive program-administered incentive funding status upon a determination that the vendor "failed to comply with contract terms, the law, or other program requirements."

- Do the current disciplinary processes under ABP and ILSFA establish a sufficient process for revocation of the ability to receive state-administered incentives? What improvements or changes are needed?
- Entities whose participation status has been revoked (or suspended) are listed in the disciplinary report. Should the names of entities whose Approved Vendor applications are denied and are therefore ineligible for participation as an AV also be included in this report or otherwise published?
- Designees are currently subject to the same disciplinary process as Approved Vendors, but not the same registration process. If the Agency determines that Designees should also apply to the Program, which items of the Approved Vendor application would be inapplicable to the proposed Designee registration process? What additional items should be included in a Designee registration process that beyond what is currently required?

Minimum Requirements

Section 1-75(c)(1)(M)(ii) requires the IPA to establish the minimum contract terms and conditions to ensure projects are properly installed and produce their expected amount of energy.

- In the development of minimum contract terms for community solar contracts, should the Agency consider differences between traditional and community-driven community solar terms and conditions?
- The Agency is considering including minimum system design criteria on customer disclosure forms for distributed generation projects. Should certain system efficiencies also be included in the minimum contract terms and conditions for distributed generation projects?

Deficient Systems

Under Section 1-75(c)(1)(M)(ii), vendors who “have a disproportionately high number of deficient systems may lose their eligibility to continue to receive State-administered incentive funding through Agency programs and procurements.”

The Agency will require that repairs, alterations, and additions to remedy deficient systems be brought to the Agency’s attention either through customer complaints or through on-site inspections. The Agency proposes that systems which are not meeting their expected output, cause damage to a customer’s property, and/or are materially non-conforming with the REC Contract may be considered as deficient systems.

- The Agency is interested in stakeholder feedback on what would be a “disproportionately high number of deficient systems.” What percentage would warrant suspension from the program, and over what time period should it be calculated?
- Are there additional categories of deficient systems which the Agency should consider?
- For purposes of this threshold, should the Agency consider valid complaints from a customer about a transaction (such as payment delays, lack of communication, hidden charges and fees) to constitute a “deficient” system?
- Should systems failing to meet baseline energy production levels (such as shaded systems and north-facing systems which meet expected output, but have unusually low expected output) be considered “deficient”?

Customer Disclosure Forms

Section 1-75(c)(1)(M)(iii) authorizes the Agency to require standardized customer disclosures. While this is already a requirement for participation in the ABP and ILSFA, the Agency seeks feedback on the format and scope of the disclosure forms.

- Should the standardized disclosure form take the format of a more limited document that contains necessary information specific only to the customer's system/subscriptions and the associated financial obligations? Under this scenario, the Agency would propose an accompanying document which explains the disclosure form and its contents also be provided to customers with the standard disclosure form.
- Is the current format of the distributed generation disclosure form, which varies by financing type, sufficient to educate customers? Is further differentiation between financing structures necessary? Is differentiation between project categories appropriate or necessary?
- The Agency currently requires ILSFA disclosure forms to include price information on net metering rates, which are necessary for determining minimum savings requirements, while the ABP disclosure forms do not include these rates. Should the net metering rates be provided to Approved Vendors and Designees by the Program Administrators for all forms? Or should those rates be posted to the program websites for customer reference?

Consumer Complaint Centers



Section 1-75(c)(1)(M)(iv) requires the IPA to establish one or multiple Consumer Complaint Centers to accept complaints regarding businesses that participate in, or otherwise benefit from, State-administered incentive funding through Agency-administered programs. Additionally, the Agency shall maintain a public database of complaints.

- The current disciplinary process includes the provision of warning letters to entities who have violated program requirements but do not warrant a suspension. The Agency proposes the database which the IPA maintains pursuant to 1-75(c)(1)(M)(iv) be expanded to include identification not only of entities which have received a suspension but also entities that are warned for violations of program requirements. This would include a description of the type of violations and number of warnings received. The Agency seeks feedback on what additional information should be included in the complaint database.
- Should the ABP Program administrator develop a page on the Illinois Shines website to which Approved Vendors and Designees may provide standardized offers for distributed generation projects and community solar subscriptions, similar to the standardized offers posted under the ILSFA program? Such a “solar marketplace” may would allow customers to compare offers as well as receive information and education on solar development. The Agency seeks feedback on whether this approach would be valuable to entities participating in the program, from Approved Vendors/Designees to customers. Are there exemplary examples from other states?

Additional Questions or Comments?

Reminder:

Written comments due December 3. Please send to:

IPA.Contactus@Illinois.gov