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Submitted Via Email to: IPA.contactus@illinois.gov

Re: Chicago Environmental Justice Network – Response to Illinois Solar for All Comment Request

To Whom It May Concern:

Please be advised that I represent the Chicago Environmental Justice Network (CEJN). CEJN is a coalition of several Chicago-based environmental justice organizations, including the Little Village Environmental Justice Organization, Neighbors for Environmental Justice, Blacks in Green, Southeast Environmental Task Force and People for Community Recovery. CEJN advocates to eliminate adverse and disproportionate risks in environmental justice communities, to ensure opportunities for these communities to participate at every level of decision-making, and to equitably allocate the benefits of public health, economic, environmental and energy programs and resources.

CEJN appreciates the opportunity to comment on IPA's specific questions regarding Illinois Solar For All (ILSFA) under the Climate and Equitable Jobs Act (CEJA) and the Revised Long-Term Renewable Resources Plan (LTP). As environmental justice organizations, members of CEJN have great interest in the implementation and success of the ILSFA. Given the time limitation in submitting these first-round comments, CEJN's below contributions are not exhaustive. CEJN is open to other options, suggestions, and opportunities and looks forward to working with IPA as revision of the LTP and rulemaking moves forward under CEJA.

Environmental Justice Communities

4. When and how frequently should environmental justice maps be updated using EJSCREEN?

CEJA will use the environmental justice communities as defined and determined in ILSFA to define locations of equity investment eligible communities. The current environmental justice mapping under ILSFA uses CalEnviroScreen indicators and data from the USEPA's EJSCREEN. Though EJSCREEN's data is updated yearly, ILSFA's environmental justice maps have not been updated since early 2019, aside from updates submitted through the self-designation process.

CEJN believes all data used for the environmental justice mapping function of ILSFA should be updated as soon as it becomes available, and at the very least, once yearly. As EJSCREEN's data is updated yearly, this should be a seamless transition. Further, each self-designated community should be added to the map within one month of acceptance through the self-designation process.

Beyond data update frequency, CEJN encourages IPA to consider other environmental justice mapping tools to better capture and address environmental justice. Under the current framework, EJSCREEN data and the self-designation process are used exclusively to determine environmental justice eligibility of an area. CEJN notes two issues with this process: (1) results of the process are binary therefore failing to consider the severity and concentrations of environmental and socioeconomic impacts in each area; and (2) data is collected by census blocks or tracts which fails to consider the complexities of at-risk or overburdened communities. To address these concerns, CEJN suggests implementation of a ranking or scoring system to identify areas of greatest concern. CEJN also encourages IPA to consider using methods outside of census data to better conceptualize each communities' burden.

ILSFA's current environmental justice determination process creates binary results. That is, an area is either determined to be an environmental justice neighborhood or not. Under the current approach, each environmental justice area is treated the same, simply by virtue that they are considered environmental justice areas. This approach is contrary to the goal of CEJA as it fails to consider the severity of socioeconomic factors, environmental impacts, and overall burden on an area. CEJA is not looking to locate areas for *equal* investment opportunities but rather for *equitable* investment opportunities. These two terms are often confused but carry distinct definitions. Equality provides the same opportunities and resources for all, while equity recognizes that each community has different circumstances and allocates the appropriate resources and opportunities needed to reach an equal outcome. Importantly, CEJA focuses on equity over equality.

Other states have employed more granular approaches to identify and rank environmental impacts and socioeconomic factors. The California Office of Environmental Health Hazard Assessment developed the CalEnviroScreen environmental justice mapping feature which uses over 20 indicators¹ and data from state, local, and federal databases to identify environmental justice areas in the state.² Like Illinois, CalEnviroScreen began as a binary system but has evolved through several updates, most recently in October 2021.³ The updated version of CalEnviroScreen takes a more granular approach to environmental justice determinations by looking at cumulative environmental, population, and socioeconomic factors in the area and color-coding concentrations within the map.⁴ CalEnviroScreen's new model is made up of 2 pollution burden components (exposures⁵ and environmental effects⁶) and 2 population characteristic components (sensitive populations⁷ and socioeconomic factors.⁸)⁹ Each census tract receives a score for as many of the indicators as necessary which is then averaged to make up both components.¹⁰ The two components are then averaged to find the pollution burden and population characteristic score of the area.¹¹ Overall scores of 0-100 are then determined by multiplying the pollution burden score by the population characteristic score.¹² The scores are mapped and color coded to allow for comparison of

¹ Indicators include: asthma rates, cardiovascular disease rates, low birth weight infants rates, educational attainment, housing burden, linguistic isolation, poverty, unemployment, air quality ozone, air quality PM2.5, children's lead risk from housing, diesel particulate matter, drinking water contaminants, pesticide use, toxic releases from facilities, traffic density, cleanup sites, groundwater threats, hazardous waste generators and facilities, impaired water bodies, and solid waste sites and facilities.

² <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

³ <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

⁴ *Id.*

⁵ *Id.*

⁵ Indicators that make up exposures are ozone concentrations, PM2.5 concentrations, diesel PM emissions, drinking water contamination, pesticide use, toxic releases from facilities, and traffic density.

⁶ Indicators that make up environmental effects are cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites and facilities.

⁷ Indicators that make up sensitive populations are asthma rate, cardiovascular disease, and low birth-weight infants.

⁸ Indicators that make up socioeconomic factors are educational attainment, housing burden, linguistic isolation, poverty, and unemployment.

⁹ <https://oehha.ca.gov/calenviroscreen/indicators>

¹⁰ <https://oehha.ca.gov/calenviroscreen/scoring-model>

¹¹ *Id.*

¹² *Id.*

each community in the state.¹³ This system “helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution’s effects.”¹⁴

CEJN encourages IPA to evolve the ILSFA environmental justice determination, like California, to develop a less binary approach that will allow ILSFA to reach the most overburdened communities to effectively move toward more equitable results. The current ILSFA environmental justice determination process has many redeeming qualities, most significantly its self-designation process which CEJN is an enthusiastic proponent of. However, the overall process leads to binary results. The granular tool should articulate levels or concentrations of both socioeconomic factors and cumulative environmental impacts to develop a ranking or comparison system of environmental justice communities. Implementation of a more granular mapping tool will allow for agencies to conduct appropriate prioritization for areas of highest environmental and socioeconomic burden to promote environmental equity in environmental justice communities.

Further, both the current approach and CalEnviroScreen, focus on data derived by census blocks or tracts. This approach does not adequately consider the complexities of communities within Illinois. For example, this method does not account for communities that may be made up of a combination of high- and low-income areas. If a low income or minority area is located within the same census tract as a white or affluent community, they may be disqualified for environmental justice determination merely because of their proximity to the non-environmental justice area. CEJN asks IPA to be mindful of this limitation with census data when drafting the revised LTP. If census data must be used, CEJN urges IPA to use census tracts over blocks as they are the smallest form of geographic census units and can best portray the true burden of the area.

Grassroots Funding

5. What “other activities” could be funded through community-based programs that could further community driven education efforts?

Under CEJA, the language regarding Grassroots Education Funding changed to specify that such funding must be used to “assist in community-driven education efforts related to the [ILSFA] Program, including general energy education, job training program outreach, and other activities deemed to be qualified by the agency.” During the November public workshop, IPA stressed that this provision is intended to focus on education only. In fact, under CEJA, the grassroots education funds must be given to community-based groups and organizations and are not to be used to support marketing by development teams unless the education is provided equally to all firms and organizations. To stress this, the IPA mentioned that an event where customers are invited to sign up may be considered marketing if not available to all interested parties.

Of highest priority to CEJN is ensuring that, under CEJA, the well-trained workforce that rose under the Future Energy Jobs Act (FEJA) becomes employed and maintains employment. For CEJA to work as intended, the IPA should shift its focus from training to actual employment placement, other activities to be funded as grassroots education should include all efforts in this direction. Ensuring graduates of Illinois-based renewable energy-specific job training programs receive appropriate job placement assistance, are hired, and hold employment is a crucial objective to effectively implement CEJA. Unfortunately, through well intentioned, FEJA’s focus on job training exclusively resulted in a highly trained workforce that is largely unemployed. CEJN urges the IPA to ensure when drafting the revised LTP that appropriate consideration and effort is given to job placement. CEJN believes IPA’s revised LTP should launch programs to hire graduates of the Illinois-based renewable energy-specific job training programs and provide a portion of the grassroots funding for local groups and organizations

¹³ *Id.*

¹⁴ <https://oehha.ca.gov/calenviroscreen/about-calenviroscreen>

offering job placement centric education services including career guidance to graduates and outreach and education of program specific potential employers.

Job placement centric activities offered by local grassroots groups should qualify for funding as “other activities.” Effectively, with the additional funding, local groups could implement career counseling services for graduates of Illinois-based renewable energy-specific job training programs. This can include offering counseling efforts like assistance with resume and cover letter writing, application completion or translation, and interview coaching. Local organizations could use the funding to organize and host job fairs in their area where local energy companies, public and private utility companies, and other renewable energy-specific entities accept applications, answer questions, and conduct interviews primarily within low-income or minority communities. The service could also facilitate or host networking events with graduates, potential employers, and other industry actors, including graduates now employed within the field, to cultivate professional connections. Other activities should also include outreach and education to energy-specific employers to explain training conducted, any incentives or benefits for hiring a graduate of an Illinois-based renewable energy-specific job training programs, location and date of job fair, and any other appropriate information regarding the program. All such activities will assist graduates to match interests and skills to career paths, connects graduates to experiences like jobs, job shadowing, and connections to professional mentors therefore making the job search process more guided and less daunting.

As mentioned in the introduction to these comments, suggestions in this document are not exhaustive. CEJN looks forward to continuing this conversation with IPA and other stakeholders to further identify areas where local groups can facilitate job placement. **Of greatest importance, CEJN urges the IPA to appropriately encourage job placement and be mindful when drafting the revised LTP that training programs under FEJA worked well, but many trained individuals are still looking for employment.**

Energy Sovereignty

6. What should be a general standard for “ownership”? Is it majority ownership, full ownership, or some other standard?

Energy sovereignty is of particular interest for community groups, especially in environmental justice areas. Energy sovereignty centers the right to make decisions regarding energy generation, distribution, and consumption with local organizations, communities, and individuals. Energy sovereignty furthers the goals of CEJA. For example, achieving community ownership of distributed energy resources is crucial to ensure the benefits are available to and reaped by the intended communities under CEJA. CEJA mandates IPA must reserve “a portion of [the ILSFA] program for projects that promote 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.” The goal of this change is to ensure that residents and local groups have control over and reap the benefits of the projects beyond just energy bill savings. During the public workshop, IPA discussed full ownership standards and explained that they were not viable for energy sovereignty as they lead to unexpected costs and other financial issues.

Energy sovereignty is a prominent goal for many environmental justice communities as it can reduce reliance on fossil fuels and the main grid, create revenue, lead to more renewable energy-specific jobs, and provide energy bill savings. CEJN believes the highest achievable form of energy sovereignty is a wholly autonomous microgrid owned and operated by the community. While examples of autonomous microgrids are few and far between right now, the renewable market is quickly developing and full energy ownership may be on the horizon. For example, there has been some recent success in the United States for energy grid “islanding”.¹⁵ The Blue Lake Rancheria,

¹⁵ <https://www.bluelakerancheria-nsn.gov/blrs-low-carbon-microgrid-is-complete/>

a tribal nation in California, partnered with public and private companies¹⁶ to build and maintain enough of its own solar energy grid that it can successfully island or use community power wholly separate from the main grid.¹⁷ In fact, in 2020 and 2021, when California suffered numerous rolling blackouts, the Blue Lake Rancheria was able to provide electricity to reservation residents and reduce stress on the main grid.¹⁸ The Blue Lake Rancheria's community scale solar project is now called a "low carbon microgrid" which results in energy bill savings, a 10% increase in employment with energy-specific jobs, CO2 emission reductions, and improved emergency preparedness.¹⁹

CEJN is a proponent of moving toward an autonomous microgrid in individual communities but understands that the necessary infrastructure and financial aspects for such a project on a large scale may not be fully available or understood at this time. As such, CEJN urges the IPA to consider incremental changes that bring Illinois closer to achieving this goal wherein the state, private actors, and individual communities foster fully informed and mutually beneficial community solar project relationships. At this time, CEJN believes the IPA can and should require the highest possible standard for community energy ownership as the standard for energy sovereignty, such that the standard is as close to full community ownership as feasible. CEJN offers the following energy models for the IPA to consider when drafting the revised LTP as vehicles for these incremental changes while promoting the fullest possible standard of energy ownership.

Partnership Flips

In a partnership flip model, ownership flips to a tax-exempt or low-tax-burden entity after the investment tax credit and depreciation benefits have been realized, typically within about 6 years. The tax-equity investor incurs costs for the project's construction and takes ownership of the majority of the project in the beginning stages.²⁰ The ownership percentages then flip when the managing member can buy out the tax equity partner.²¹ Once the partnership flips, the equity partner offers to the managing partner the higher percentage ownership at market value or appropriate fixed estimates of market value.²² Allocation of cash flow generated from the project is negotiated between the partners separately and is calculated in a manner to achieve an agreed-upon rate of return over the set period of time.²³

This structure is common for community renewable energy projects, especially those eligible for production tax credits as they are a way to raise tax equity and can be powerful tools to achieve ownership.²⁴ It is an effective way to finance renewable energy projects when a developer lacks sufficient tax liability to fully utilize a project's tax benefits.²⁵ The partnership flip model can be mutually beneficial to both developers or investors and equity partners.²⁶ It is also an attractive method of finance for tax-equity investors seeking to benefit from the renewable credit, depreciation credits, and profit from project cash flows.²⁷

¹⁶ The microgrid was built by a partnership between the Blue Lake Rancheria and California Energy Commission and its EPIC program, the Schatz Energy Research Center and Humboldt State University, Pacific Gas and Electric Company, Idaho National Laboratory, Siemens, Tesla, REC Solar, McKeever Energy, Colburn Electric, Kern Construction, the American Red Cross, US Department of Energy, DOE Office of Indian Energy, National Renewable Energy Laboratory, U.S. Department of Interior, and DOI Bureau of Indian Affairs.

¹⁷ <https://www.bluelakerancheria-nsn.gov/blrs-low-carbon-microgrid-is-complete/>

¹⁸ <https://www.greenbiz.com/article/how-indigenous-communities-build-energy-sovereignty>

¹⁹ *Id.*

²⁰ <https://www.bluelakerancheria-nsn.gov/blrs-low-carbon-microgrid-is-complete/>

²¹ https://www.energy.gov/sites/default/files/2014/04/f14/AK_RE_Financing57491.pdf

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ <https://www.projectfinance.law/publications/2021/february/partnership-flips/>

²⁶ *Id.*

²⁷ https://www.energy.gov/sites/default/files/2014/04/f14/AK_RE_Financing57491.pdf

²⁸ *Id.*

The partnership flip model has been widely used in the community wind power project sector in the United States, most notably in Minnesota.²⁸ A community wind power project developer coined a partnership flip model as “The Minnesota Flip” and campaigned for stronger legislation to acknowledge this model and make project development easier on locals.²⁹ As a result, major benefits seen in Minnesota include investor attraction, tax credit and guaranteed marketability for investors until the flip, local owner profits before and after the flip occurs, and regional economic growth including job opportunities in renewable energy sector.³⁰

Further discussion on partnership flips and protections important to CEJN when using this model are discussed in CEJN’s response to question 7 below.

Energy Cooperatives

Under an energy cooperative model, customers, known as members, purchase shares of the renewable energy system and are given benefits, such as bill savings, while the project owner bears the cost of maintenance and operation. Cooperative models are often used in grocery store settings, where the store is owned by the people who shop there so they decide product, sourcing, and quality standards for products and vendors. The same would be true for an energy cooperative, members would have the authority to make crucial decisions on generation, sources, and distribution of their energy. Importantly, CEJN would like IPA to be mindful that ILSFA boasts no upfront costs to customers to eliminate barriers for low-income communities, which CEJN agrees with. Under this model, purchase of shares would be a prerequisite but IPA could consider building into the LTP programs to allocate incentives or additional funding to alleviate any upfront costs for eligible communities.

Energy cooperatives have been used successfully in several states. For example, The People’s Energy Cooperative is an electric distribution cooperative serving rural areas in Minnesota since the 1930s.³¹ The People’s Energy Cooperative either owns or has an interest in three solar arrays from which energy is sold to members for lower rates.³² Hawai’i is also seeing a trend toward developing energy cooperatives as a step toward energy sovereignty.³³ Ho’ahu Energy Cooperative was formed as a private cooperative in 2020 with an aim to provide local owners affordable renewable energy.³⁴ Ho’ahu Energy Cooperative recently submitted a bid to Hawaiian Electric, the main energy utility in Hawai’i, to sell solar energy which would then be provided to cooperative members at a discounted rate.³⁵ Any energy generated over members’ demand would then be sold to Hawaiian Electric to provide revenue for members.³⁶

Further, energy cooperatives can be used to foster a mutually beneficial relationship between industry and low income or minority communities. In 2018, the Kit Carson Electric Cooperative partnered with the Picuris Pueblo, a small tribal nation in New Mexico, on a community solar power project.³⁷ With funding from their own government and the New Mexico Department of Energy, the Picuris built a 1-megawatt solar power system made up of approximately 4,000 solar panels owned by the residents.³⁸ Energy generated at the solar array is sold to Kit Carson Electric Cooperative, which relies in part on the solar power system to provide power to its membership, including Picuris.³⁹ The solar project creates revenue for Picuris, meets 100% of daytime energy

²⁸ https://www.c4ce.org.au/knowledge_resources/case-studies/investment-models/united-states-minnesota-flip-wind-farm-business

²⁹ *Id.*

³⁰ *Id.*

³¹ <https://www.peoplesenergy.coop/>

³² *Id.*

³³ <https://www.hoahuenergy.coop/>

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

³⁷ <https://kitcarson.com/picuris-pueblo-solar-1-connects-to-the-grid/>

³⁸ *Id.*

³⁹ *Id.*

demand, provides renewable energy-specific jobs, and reduces energy costs for tribal members.⁴⁰ Picuris residents receive a \$50-\$75⁴¹ credit on their energy bills.⁴² The partnership also benefits Kit Carson Electric Cooperative as the solar array added solar capacity and brings the company closer to 100% daytime solar power, an internal goal for the company.⁴³ Since Kit Carson developed solar projects, like the Picuris project, the company has less of a reliance on fossil fuels changing the company's coal purchase rate from 90% to 40% in just 4 years.⁴⁴

7. Should project financing models that include transfer of ownership after a set period of time be allowed? For example, to take advantage of federal tax incentives should project financing models that include the transfer of ownership after a set period of time be allowed? If so, what should be the consequences if ownership is not transferred?

A time specific partnership flip model allows ownership to “flip” to a tax-exempt or low-tax-burden entity after a pre-determined period of time when the investment tax credit and depreciation benefits have been realized.⁴⁵ As detailed in CEJN's response to question 6 above, CEJN believes time specific models, including partnership flips, should be allowed under ILSFA. Partnership flips are increasingly common in community renewable energy programs, most notably in solar and wind programs, and have been largely successful when afforded the appropriate protections.⁴⁶

IPA must work additional protections to support low-income and environmental justice community entities in achieving ownership through partnership flips into the revised LTP. However, such protections should not go over and beyond the typical range of protections afforded to solar system owners as they could be seen as barriers of entry. This balance can be struck by including protections like those afforded to buyers in the adjustable block program. Further, CEJN asks the IPA to be mindful that this is a complex financial model that not all community solar project participants will understand. As such, CEJN believes educational outreach programs specific to ownership models, like partnership flips, should also be supported in the LTP to ensure all participants are fully informed.

CEJN looks forward to continuing to work through appropriate options for protection and educational efforts with the IPA as revision and implementation of the revised LTP moves forward.

Distributed Generation Sub-Program

13. How can Approved Vendors be supported to encourage project development in areas that are currently underserved by ILSFA Approved Vendors?

Participation in the distributed generation subprogram has been low under the current LTP and FEJA, particularly in low-income areas. Approximately \$7.5 million was available for the LIDG subprogram for each year since implementation. However, as of summer 2021, \$16.98 million of cumulative funding has been unallocated and unused. Many issues surrounding this subprogram have been described as technical and administrative barriers that make the process intolerable for Approved Vendors and participants.

Though CEJN provides some suggestions for encouragement of this program through these comments, it believes that the issues with the subprogram prove to be too technical and complex to be solved via written comment

⁴⁰ <https://www.greenbiz.com/article/how-indigenous-communities-build-energy-sovereignty>

⁴¹ Depending on number of shares owned.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ <https://kitcarson.com/picuris-pueblo-solar-1-connects-to-the-grid/>

⁴⁵ <https://www.stoel.com/legal-insights/special-reports/the-law-of-solar/sections/project-finance-for-solar-projects>

⁴⁶ *Id.*; see also Rev. Proc. 2007-65 available at <https://www.irs.gov/pub/irs-drop/rp-07-65.pdf>

period. Instead, IPA should launch and facilitate candid conversation between stakeholders, the public, and appropriate agencies through regularly convened working group meetings to discuss and address administrative and technical barriers within the program. Specifics on how such meetings would work are offered in CEJN's response to question 15 below.

CEJN believes IPA should commit to improving the project application and approval process for the low-income distributed generation subprogram (LIDG) in the revised LTP. This commitment should include general streamlining, administrative and project submission burdens reduction, identification of ways to attract or incentivize industry actors to the LIDG landscape, and an increase REC prices consistent with Approved Vendors' upfront and operation costs. Through these commitments, CEJN believes IPA should eliminate as many barriers as possible for entry and participation in ILSFA.

Project completion by Approved Vendors in low income and minority areas has been particularly low as project submission and approval in the LIDG subprogram has been called frustrating and difficult. The process has even driven some Approved Vendors to withdrawal from the subprogram for program flaws and structural barriers. These administrative burdens must be lessened to stimulate participation in the subprogram. For example, IPA could implement a process that mimic the Adjusted Block Program process wherever possible without compromising LIDG program requirements and additional consumer protections to streamline the project submission process. Particular administrative issues should be further discussed and identified in the stakeholder working group.

CEJN implores the IPA to also consider increasing REC prices and tailoring them to reflect market trends and values with a consideration of the costs borne by Approved Vendors. Current REC prices do not adequately reflect subprogram participation costs, including costs associated with customer acquisition and project submission. For the subprogram to be enticing, it must be mutually beneficial to both the community and vendors. We cannot expect vendors to participate without any benefit to them or their company. If initial and operational costs exceed or minimize profits, finding willing Approved Vendors will become too difficult and ILSFA community projects will fail. IPA should be mindful of all associated costs and effort by Approved Vendors in approval process, project selection, project construction and maintenance when setting increase REC prices.

15. What should ongoing stakeholder engagement/feedback process look like to inform efforts to expand LIDG development?

As noted in response to question 13 above, the LIDG subprogram has not been successful under the current LTP and FEJA and it requires numerous technical and administrative improvements. CEJN believes it would be helpful for IPA to write within the revised LTP a plan for regularly convened working group or stakeholder meetings to allow for in-depth discussion of program issues, barriers, and successes. This process will need to include detailed technical dialogues that are not easily fostered through a written comment approach.

The purpose of the stakeholder meetings is to identify and address issues facing the subprogram. Working group meetings should occur at least twice monthly within both business and non-business hours to allow for highest participation rates. Participants should include the IPA, Elevate, InClimate, LIDGS/ILSFA providers, grassroots educations or local organizations involved in ILSFA, and any other interested parties. Recommendations resulting from each meeting should be incremental changes that may be implemented between plan cycles and be facilitated by all necessary agencies. Any engagement or feedback must be public and conducted in the most transparent way possible to allow for a reworking of the reputational issues with the subprogram. Ideally, this working group would begin to meet before the revised LTP is completed and continue after it has taken effect so that IPA can consider such conversations at all stages of implementation. CEJN believes the creation of a stakeholder working group will facilitate effective and productive dialogue to work through issues with the distributed generation subprogram.

When developing and engaging with the working group, CEJN respectfully requests the IPA to continue to be mindful of the ongoing pandemic and the public's great interest in this process. As such, the agency should continue to offer a web-based live stream or recording of each meeting to keep the public and stakeholders apprised of discussions and progress. Each recording or live stream should offer translation and other appropriate accessibility accommodations. All recordings should be posted within one week of completion to the IPA website for public review. Members of the interest public should be able to sign up for a listserv which will provide alerts automatically when a meeting is scheduled or when a recording is posted on IPA's website.

Non-Profit and Public Facility Sub-Program

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?

The current LTP allows any organization that hosts nonprofit or public facility projects be "a critical service provider for the community." The ILSFA Approved Vendor Manual provides a list of qualifying non-profits which include among others, domestic violence centers, emergency service agencies, food pantries, homeless shelters, and libraries.⁴⁷ Organizations not listed in the Approved Vendor Manual may apply for critical service provider status if certain characteristics are met.⁴⁸

CEJN supports the change that to qualify as a critical service provider for the community, a facility will be required to prove that it provides a majority of its efforts and activities to low-income participants to further the intention of ILSFA and CEJA. However, CEJN believes IPA should try to eliminate all unnecessary barriers of entry or participation of ILSFA programs to effectively realize the intention of CEJA and ILSFA. As such, this newly proposed prerequisite should not be required for all critical service providers as it may only act as a barrier or deterrence from participation. Instead, certain facilities should be able to apply for and receive an exemption from this burden if their primary service is education or if they offer services that are inherently used by low-income, minority, or under privileged individuals. Many of the critical service providers listed within the Approved Vendor Manual provide services for low income or environmental justice community members simply by virtue of what the services are. For example, public schools, libraries, domestic violence centers, homeless shelters, food pantries, transitional housing, and women's or children's shelters among others should qualify for an exemption due to their inherent service of underprivileged, low income, or minority individuals.

Low-Income Community Solar Sub-Program

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

The IPA Act details a Low-Income Community Solar sub-program that the IPA must reserve "a portion of this program for projects that promote energy sovereignty through ownership of project by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, or community-based limited liability companies providing services to low-income households." Projects that include energy ownership should make sure that locals have control over the project and reap benefits over and above bill savings.

⁴⁷ Qualified critical service providers include: advocacy organizations, affordable housing providers, after-school providers, childcare centers, community centers, community financial institutions, disability service providers, domestic violence centers, energy service agencies, family support agencies, food pantries, homeless shelters, hospitals, healthcare facilities, and clinics, housing service providers, immigration service providers, job training and workforce development service, law/legal centers, libraries, mental and behavioral health facilities, municipal administration officers, places of worship, rehabilitation providers, public schools, senior centers, social service agencies, transition or supportive housing, women's or children's shelters. <https://www.illinoisfa.com/app/uploads/2020/06/ILSFA-Approved-Vendor-Manual.pdf>

⁴⁸ *Id.*

CEJN would like to echo its discussion of energy sovereignty from CEJN’s response to question 6. CEJN believes full energy ownership should be the ultimate standard for energy sovereignty in Illinois. To achieve that IPA should implement incremental changes to allow for the fullest standard of community ownership as feasible at this time. These changes can be implemented through models discussed in CEJN’s response to question 6 above. CEJN understands that other models such as a sale-leaseback or pass-through lease, may be successful and is interested to learn more as this process continues. Of utmost importance to CEJN is that when designing community solar project regulation, the IPA be mindful that the goal of community solar is to foster a fully informed and mutually beneficial relationship for all involved with the highest standard of energy sovereignty available afforded to the community.

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

Under FEJA and the current LTP, very few solar installations for low-income individual residents have been completed. This is largely because of the extensive prerequisites and construction requirements for each home. For example, roofs “must be in good condition and will not need to be replaced within 15 years” and a “modern electrical panel must be present.” Many interested parties were unable to participate in the program because they were first required costly upgrades like installing a new roof or upgrading electrical systems and wiring. FEJA and the current LTP did not allocate funding for such upgrades to individual homes and thus residents were forced to bear these substantial costs. In that sense, FEJA was doomed from the start in low-income areas as the expensive prerequisites were seen as an inaccessible obstacle.

Continuing to offer funding for individual solar panel installation without anticipating costs related to appropriate housing, HVAC, and electrical systems will lead to accessibility and participation issues so that it can occur in high income or affluent areas exclusively. These areas will then capitalize on solar energy gains instead of low-income communities as intended by ILSFA. As such, CEJN implores IPA to anticipate additional individual costs associated with housing, HVAC, and electrical needs to support solar installation. IPA should allocate funds for these costs to better incentivize and allow for low-income individuals to participate in the program.

Equity/Workforce Development

28. How should “facilitating placement” go beyond sharing of information between graduates and potential employers?

Under the IPA Act, the third-party administrator’s responsibilities include “facilitating placement for graduates of Illinois-based renewable energy specific job training programs . . . and programs administered under Section 16-108.12 of the Public Utilities Act.” As stated throughout these comments, one of CEJN’s most significant concerns with FEJA is that all efforts were training focused which led to a large group of well-trained but unemployed individuals. An important change in CEJA is centered on this issue. CEJN wishes to encourage and continue the trend beyond job training toward employment placement and asks IPA to be mindful of this shift when drafting the revised LTP.

Facilitating placement can mean a number of efforts beyond sharing information. CEJN offers the following non-exhaustive list of potential facilitating placement efforts IPA should consider working into the revised LTP:

- Create an incentive program for hiring Illinois-based renewable energy training program graduates and conduct outreach to Approved Vendors and other potential renewable energy employers to spread awareness of this program;

- Create and make publicly available a point system or other ranking system for Approved Vendors articulating how often they hire from qualified job training programs or other qualifying programs to strengthen accountability and transparency;
- Host job fairs where renewable energy-specific employers, including but not limited to Approved Vendors, can connect, communicate, accept applications, or conduct interviews with graduates of Illinois-based renewable energy training programs;
- Conduct outreach to non-participating potential employers regarding the program, training included, and any incentives offered with hiring participants;
- Host job application workshops where services such as resume and cover letter writing assistance, interview coaching, application completion and translation, and free grooming are available;
- Facilitate a mentorship program where graduates can connect with others working in the industry to learn and get advice regarding the transition into employment;
- Connect renewable energy employers and recent graduates based on job location, required skills or experience, benefits or payment offered, hour requirement i.e. full time/part-time, and interest; and
- Send job alerts to recent graduates known to be conducting job search.

29. What are key features should the clearinghouse offer?

Under IPA Act, the third-party administrator must “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.” As stated above, CEJN believes the focus of initiatives under CEJA and the revised LTP should be job placement centric instead of training. Therefore, the web-based clearinghouse should provide information and features that promote job placement. As a baseline feature, the clearinghouse should have translation services in common languages of the area and any other common accessibility accommodations.

CEJN offers the following non-exhaustive list of suggestions for features to be offered on the clearinghouse specifically to encourage and facilitate job placement and initiate conversation between graduates and employers:

- Job postings with live links to the hiring entity’s website and applications;
- A “recommended for you” page that provides suggestions for jobs, events, employers, or graduates based upon the profile or user’s previous searches and applications;
- Information for potential employers and graduates regarding the time, date, location, and registration requirements for any upcoming job fairs, application workshops, training programs, networking events, or other events regarding renewable energy specific employment;
- Ability to connect via chat or email function with other members on the site; and
- Job and candidate recommendation alerts sent via email based upon a profile, provided personal information, or previous searches.

Thank you for your consideration of these comments.

Sincerely,

/s/ Cassandra Hadwen

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