



June 29, 2023

RE: June 8<sup>th</sup> request for stakeholder feedback on the IPA 2024 Long-Term Renewable Resources Procurement Plan

To whom it may concern,

The Illinois IBEW Renewable Energy Fund is a FEJA funded workforce development program operating state-wide through 25 training partners including IBEW Local Unions, High Schools, Community Colleges, and Community-based Organizations. We have been a strong supporter of the Illinois Solar for All mission and have provided Eligible Trainees to projects across Illinois. We thank you for the opportunity to provide feedback on the 2024 Long-Term Renewable Resources Procurement Plan. Many of the questions listed in this feedback opportunity have been addressed in the Illinois Solar for All PY6 Approved Vendor Manual released earlier this week. Please review responses to the specific questions in the feedback request below.

## **Chapter 8: Illinois Solar for All**

### **Topic 5: Eligible Job Trainees and Job Training Requirements**

- 1. Is a curriculum resulting in NABCEP Board Certification necessary for sufficient preparation for the kinds of work assigned to ILSFA job trainees?*

**Training programs funded under FEJA or CEJA, as well as Other Qualifying Programs, need to conform to at least one of the pathways to be recognized as a Qualified Person per the Illinois Commerce Commission's Distributed Generation Installer Certification Program. Failure to do so will result in Eligible Trainees aging out of the program without qualifications to continue working in this field. NABCEP Board Certification is one of the defined pathways. However, completion of curriculum alone does not qualify an individual to take a NABCEP Board Certification Exam. Industry experience in a decision-making role is also required.**

- 2. Should a NABCEP Associated Credential training option alone be a sufficient curriculum to qualify an Other Qualifying Program? If so, should 100% of classroom requirements completion be required, compared to the 50% or more classroom completion requirements for existing options, detailed above?*

**ILSFA Other Qualifying Programs require a defined pathway to be deemed a Qualified Person per the ICC Distributed Generation Installer Program upon completion of the program. The NABCEP PV Associate is not a Board Certification and does not meet this requirement. NABCEP Board Certifications (PV Installation Professional being the only program reviewed by the ICC) require both advanced classroom training and industry experience in a decision-making role. The NABCEP PV Associate credential is intended to test basic knowledge, and is not equivalent to NABCEP Board Certifications. This is clearly stated on the NABCEP website and in the NABCEP Associate Registered Training Provider Manual for Exam Administration.**

- 3. Should a waiver option be made available for Approved Vendors to extend the cycle of a job trainee by an additional (1) year after the initial 2-year cycle in order to comply with the job training requirements?*

**A waiver should not be necessary if the FEJA or OQP training organizations the Approved Vendor is in partnership with continuously recruits for future cohorts. However, if there is a documented shortage of Eligible Trainees, an extension waiver is preferable to any potential waivers issued to Approved Vendors to bypass this requirement. With all waivers, recent documented outreach and verification from the training organization should be required. All waiver applications should be made available via FOIA requests.**

- 4. Should the waiver described above be limited to smaller Approved Vendors with less than 50 employees? Allowing smaller Approved Vendors to retain their current workforce from FEJA or OQP programs without having to let job trainees go. Are there any other recommendations for limits to a waiver?*

**All Approved Vendors should have the same requirements regardless of size of the organization.**

Respectfully submitted,



Robert Hattier  
Executive Director