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December 3, 2021

Submitted Via Email To: [IPA.contactus@illinois.gov](mailto:IPA.contactus@illinois.gov)

Re: Revised Long-Term Renewable Resources Plan – Response to ABP 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.

As environmental justice organizations, members of CEJN take a great interest in the implementation and success of Illinois' Adjustable Block Program under CEJA and the new Revised Long-Term Renewable Resources Plan (LTP). Given the brief time limitation in submitting these comments, CEJN's below suggestions, comments, and answers are not exhaustive. CEJN is open to other options, suggestions, and opportunities and looks forward to working with IPA as revision and rulemaking moves forward under CEJA.

***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?***

CEJN believes that any waitlists or redistributions of uncontracted capacity should take into account environmental justice concerns along with the mandated first-come first-served system or any other possible measurements. This could include giving priority to projects on the waitlist that promote other environmental or equity concerns, such as those that include pollinator-friendly habitats, are located in higher density regions, or those in geographic areas that are not currently being served by such projects. Geographic concerns are particularly appropriate for community solar projects, which are currently concentrated geographically in mostly rural, low-density regions of the state.<sup>1</sup> This is consistent with IPA's authority to develop its own criteria to prioritize between projects submitted at the same time, and it serves the overall equity and environmental justice-

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<sup>1</sup> See the study on density versus geographic location for community solar projects found in public comments by ELPC and Vote Solar pages 5-8: [https://www2.illinois.gov/sites/ipa/Documents/Draft%20Revised%20Plan%20-%20Summer%202019/Comments%20to%20Draft%20Revised%20Plan/ELPC\\_Vote%20Solar%20Plan%20Comments.pdf](https://www2.illinois.gov/sites/ipa/Documents/Draft%20Revised%20Plan%20-%20Summer%202019/Comments%20to%20Draft%20Revised%20Plan/ELPC_Vote%20Solar%20Plan%20Comments.pdf)

based goals that permeate throughout CEJA. Additionally, IPA has already developed similar prioritization schemes, such as the points-based priority system for community-driven community-solar projects, that could help inform the development of a similar scheme for prioritizing projects off of a waitlist.

***7. For this draft Second Revised Plan, the Agency is proposing that the Program Administrator will establish a mentorship/training program for new Approved Vendors and designees that are minority-owned, woman-owned, veteran-owned, disability-owned or considered a small business with the goal to help those new program participants learn about program requirements and application procedures... The Agency is seeking stakeholder feedback particularly on how to 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?***

CEJN believes that building a successful mentorship program should include more than just training and networking. One hard lesson that came out of experiences with CEJA's predecessor, FEJA, is that training programs by themselves simply do not have enough of an impact for minority groups trying to participate in the industry. While this is a program for vendors/businesses instead of just individuals, that same lesson still applies. In particular, one of the greatest barriers to entry for new minority-owned or woman-owned businesses is the lack of start-up capital. There are numerous reasons for this, such as lack of generational wealth and systemic racism within lending practices. It would be a great benefit for a mentorship program to also help connect new businesses to grants and other sources of funding to help them get started. This would help them get over one of the biggest initial barriers to entry. An example of a similar equity program that could help provide guidance can be found in Illinois Cannabis' Social Equity Program,<sup>2</sup> which not only helps guide applicants throughout the licensing process, but also helps them to connect with grants, outside funding sources, and other financial resources.

***10. While the Agency believes an initial batch of 100 kW is not a significant barrier to new market entrants, the Agency welcomes stakeholder feedback on whether the initial batch size and/or 75% verification level for new minority or woman-owned Approved Vendors should be set at a lower level.***

CEJN believes that the IPA should consider lowering the initial batch size and/or verification level for new minority or woman-owned Approved Vendors. Given that these types of new businesses already face so many extra barriers to entry that are external to the program for merely getting their businesses off the ground, any additional help that the program provides could make a large difference. While those requirements may not be a significant barrier for traditional new market entrants, the same may not be true for minority-owned businesses. Additionally, providing this help to these vendors is consistent with the overall goals of CEJA to promote a more equity-driven procurement strategy for the state.

***15. If Designees are permitted to qualify as EEC, would the EEC category be limited to projects that have both an EEC Designee and Approved Vendor or would just an EEC Designee qualify a project for utilizing the capacity set aside for this category?...***

CEJN believes that if projects are allowed to qualify through designees or subcontracting, there should be a system, such as through set criteria or a priority system, to ensure that minority-owned, woman-owned, or other similar small companies are given greater weight. While allowing use of designees or subcontractors to qualify will almost certainly mean that there would be more qualifying applicants overall, CEJN is concerned about the possibility that this could lead to larger firms or aggregators crowding out these smaller applicants. Given that an

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<sup>2</sup> See <https://www2.illinois.gov/dceo/CannabisEquity/Pages/default.aspx>

overarching goal throughout CEJA is to help promote smaller and minority-owned businesses, it seems consistent with that purpose to provide some extra assistance for these types of businesses. One possibility could include that only projects not qualifying through subcontractors or designees (or those with a high enough percentage of subcontractors) could have access to advances of predevelopment capital and other project resources. This could help ensure that these resources are being used to help promote the larger equity-based goals of CEJA instead of just focusing purely on EEC numbers.

### ***Community-Driven Community Solar Prioritization System***

While CEJN overall supports the different criteria for prioritizing community solar projects, CEJN believes that the proposal to require projects meet a minimum of 6 points between all the criteria may be too low. The main purpose of the criteria, particularly the primary criteria, is to help ensure that community solar projects involve true community engagement. However, if the minimum requirement is only to reach 6 points, projects can qualify purely off of meeting some of the additional criteria without ever addressing the core community engagement criteria. Instead, CEJN proposes that there be a minimum requirement of points specifically coming from the primary community engagement criteria instead of the just additional criteria. While these additional criteria do promote important environmental justice concerns, CEJN is concerned that allowing them to control the overall priority system risks losing the larger purpose of the program to focus on community engagement. A good starting point would be having a minimum requirement of 6 points overall, 4 of which must be from meeting primary criteria. This would allow the environmental justice priorities found in the additional criteria to still have extra weight to help projects, but it would mean that the core priority remains community engagement and community involvement in these projects.

Thank you for your consideration of these comments.

Sincerely,

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