

November 4th, 2022

To: Illinois Power Agency
From: Joint Commenters of ICJC Jobs and Economic Justice Subcommittee
Re: Proposed Elements of the Initial Energy Workforce Equity Database
Request for Stakeholder Feedback

The Illinois Clean Jobs Coalition and the below-listed Joint Commenters thank the Illinois Power Agency for the opportunity to comment on the *Proposed Elements of the Initial Energy Workforce Equity Database*.

The Joint Commenters include:

- A Just Harvest
- Central Illinois Healthy Community Alliance
- Central Road Energy, LLC
- Chicago Jobs Council
- Clean Power Lake County
- Illinois Environmental Council
- Illinois People's Action
- Little Village Environmental Justice Organization
- Mayers Strategic Solutions, LLC
- Pilsen Neighbors Community Council
- Prairie Rivers Network
- ONE Northside
- StraightUp Solar
- United Congregations of Metro East
- Vote Solar

We strongly support the IPA moving forward with an interim Energy Workforce Equity Database while the equity and workforce programs at DCEO are being developed. We encourage the IPA to get the database up and running as soon as possible. The database will be a critically useful tool for ensuring equity eligible persons and employers are finding each other. Placement of equity eligible persons into clean energy jobs is critical for developing an equitable clean energy economy, particularly in the solar industry. Additionally, the information gathered into the database may also become useful for the disparity study required in Section c-15.

As the IPA designs a system for allowing individuals to enter themselves into the database, they should consider using an input form that would tell the individuals if they are an Equity Eligible Person, as many individuals will likely be unfamiliar with the term. Many of the qualifications are simple yes or no questions, but identifying if an individual lives in an Equity Eligible Community would require the IPA to create an address lookup tool. This tool would be an easy extension of the map already required by Section c-25(2)(A).

In this request for stakeholder feedback, the IPA has identified several components of the Energy Workforce Equity Database that it proposes to move forward on now. We urge the IPA to create as many components of the database as it can, particularly the publicly-facing online tool (Section c-25(2)), while it waits for DCEO to stand up the workforce hubs. For example, the IPA could already produce the following in a public-facing tool:

- A map of environmental justice and equity investment eligible communities (c-25(2)(A));
- Information on workforce training service providers and training opportunities available to prospective workers (c-25(2)(D));
 - For example, the training programs that are still running from FEJA
- Renewable energy company diversity reporting (c-25(2)(E));
- A list of equity eligible contractors with their contact information, types of work performed, and locations worked in (c-25(2)(F));

As the IPA develops an interim database, it should take advantage of any existing database or partial database that already identifies Equity Eligible Persons. In particular, IPA should consult with ComEd regarding any useful information collected as part of FEJA and use it to pre-populate the database. The IPA should also look to any other existing FEJA programs for additional data to pre-populate the database, as any graduate of those programs is already an Equity Eligible Person. If pre-populating the database is not desired (perhaps due to privacy concerns) then this information could be used to contact known Equity Eligible Persons to invite them to enter their names into the database.

Database Vision

We'd also like to share a vision for the future of this database. For the workforce training programs created by CEJA to be successful, an extensive database will need to be operated. The IPA should coordinate with DCEO to determine how DCEO plans to track data about its workforce programs. Perhaps the Energy Workforce Equity Database should be the overall database for also tracking DCEO's programs, or maybe the Energy Workforce Equity Database will be synchronized with a separate database created by DCEO. Below, we expand on our vision for how the Energy Workforce Equity Database could be expanded to also serve as the central database for tracking all of the CEJA workforce programs.

Tracking program participants through the workforce training programs created by CEJA is critical to ensuring equitable outcomes. The Energy Workforce Equity Database should operate as a supersystem for all data related to the operations of the Clean Energy Workforce Hubs and other workforce equity programs in CEJA. A robust database would allow Regional Administrators to assess the success of their programs in real-time. Furthermore, Community Based Organizations (CBO) and other participants in CEJA workforce training programs (i.e Department of Corrections, Department of Labor, etc) should have access to the database.

Ideally, the Energy Equity Workforce Database will have the ability to interface with the Department of Labor's [Registered Apprenticeship Partners Information Database System \(RAPIDS\) database](#). While this may be a long-term goal, this interface would be valuable

because the RAPIDS database is the only recognized repository for DOL registered apprenticeships. RAPIDS tracks registered apprentices (including characteristics such as age, race, enrollment & completion status) occupations, job openings, and other relevant program information. Research has shown a significant disparity in the number of people of color and women entering and completing registered apprenticeship programs. Creating an interface or MOU between these database systems is one way to monitor progress toward decreasing this disparity and to highlight areas of opportunities in the clean energy sector. Database integration and data matching across systems can support the equity vision of CEJA.

Additionally, we suggest that this database be integrated with the Illinois workNet database, which maintains a list of Workforce Innovation and Opportunity Act (WIOA) eligible training programs and training providers.

Overall this database is envisioned to be the central location for the Clean Energy Workforce and its pipeline to jobs. The public-facing tool online required by Section c-25(2) has the potential to become a one-stop shop for the public to access all things CEJA Workforce related, driving the engagement that will make the equity workforce programs a success. We strongly encourage collaboration with DCEO to make the Energy Workforce Equity Database as ambitious as possible as the workforce programs roll out.

Again, the Illinois Clean Jobs Coalition and Joint Commenters thank the Illinois Power Agency for the opportunity to comment on this proposal.

If you have any questions on these comments, please reach out to:

Deonte Moore

Green Jobs Workforce Program Director

Illinois Environmental Council

deonte@ilenviro.org