

To: Illinois Power Agency
From: John Delurey, Juliana Pino, and Participants in the Illinois Solar for All Working Group
Date: 7/22/2022
Re: ILSFA Working Group Comments on the IPA's Program Evaluation Request for Feedback

Dear Illinois Power Agency & Program Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments in response to the IPA's Illinois Solar for All Evaluation Request for Stakeholder Feedback. This memo describes an overview of the Illinois Solar for All Working Group.

Background: Illinois Solar for All Working Group

The Illinois Solar for All Working Group (the Working Group) formed from a subset of members of the Illinois Clean Jobs Coalition, who had comprised an Environmental Justice-Solar-Labor Caucus (the Caucus) during the negotiation of policies that would become the Future Energy Jobs Act (FEJA). The group formed in order to bring the best practices and policies to the Illinois energy landscape that would serve to maximize benefits to the economically disadvantaged households and communities that targeted programs are intended to serve. The group was co-facilitated by a representative of a solar company, Amy Heart of Sunrun, and a representative of an environmental justice group, Juliana Pino of the Little Village Environmental Justice Organization.

Following passage of FEJA in December 2016, the Caucus expanded into the Illinois Solar for All Working Group, an open membership group including experts on environmental justice, environmental advocacy, consumer protection, solar business, low-income solar policy, energy efficiency, job training, program design, and other areas, who have substantive research and experience to bring to bear on implementation of Illinois Solar for All. Currently, the Illinois Solar for All Working Group meets on a monthly basis and is co-facilitated by Juliana Pino of Little Village Environmental Justice Organization and John Delurey of Vote Solar.

The following members of the Working Group are signatories to these comments:

Renewable Energy Evolution	Vote Solar
Central Illinois Healthy Community Alliance	Illinois People's Action
Environmental Law & Policy Center	Sustain Rockford
Sunrun	Nexamp
Little Village Environmental Justice Organization	Illinois Environmental Council
GRNE Solar	Trajectory Energy Partners
Central Road Energy	Audubon Great Lakes
Blacks In Green	Seven Generations Ahead
Citizens Utility Board	Futurez NFP, Incorporated (FNFP)

Working Group Commenting and Engagement History for IL Solar for All

- A draft White Paper delivered to the IPA in May 2017 and [published](#) that July.
- [Responses](#) to IPA's June 2017 Request for Comments on the Long-Term Plan.
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.¹
- Additionally, the group has engaged in stakeholder sessions and submitted comments on:
 - Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClimate on December 10, 2018;
 - Grassroots Education and Approved Vendor components on January 9, 2019;
 - Environmental Justice provisions on January 30, 2019;
 - Job Training provisions and Third-Party Evaluation provisions on February 7, 2019;
 - Project and Participant Eligibility and Verification Processes on March 13, 2019;
 - the Low-Income Community Solar REC contract on April 2, 2019;
 - Project Selection on April 15, 2019; and
 - Consumer Protection on April 19, 2019.
- Many Working Group participants also attended IPA's June 2019 workshops and helped develop the Working Group's response to IPA's July 3, 2019 Request for Comments on the Long-Term Plan Update.
- The Working Group continues to provide input to comment and stakeholder processes initiated this year to implement the Revised Long-Term Plan, including via May 2020 comments on project selection and July 2020 comments on Approved Vendor reporting.
- In early 2021 the Working Group submitted comments on the [DG subprogram referral](#) process and [project selection](#), as well as on the community solar pilot procurement.
- In summer 2021, the Working Group submitted multiple sets of comments following IPA workshops on the Long-Term Plan Update, specifically:
 - [Comments on strengthening MWBE participation in renewables programs/procurements.](#)
 - [Comments on the Solar for All and Adjustable Block Programs, generally.](#)
 - And [comments on REC pricing.](#)
- And following the passage of CEJA in fall 2021, the Working Group submitted additional comments regarding the Long-Term Plan Update.
- Attendance by multiple Working Group participants at many (likely, all) IPA and Program Administrator public workshops and webinars related to the Solar for All Program, since 2017.

Program Principles for Illinois Solar for All

During the negotiation of FEJA, the Caucus membership collectively agreed upon the following policy principles to guide our work moving forward. These principles were rooted in the *Low-Income Solar Policy Guide*² authored by GRID Alternatives, Vote Solar, and the Center for Social Inclusion; further adapted through iterative deliberations in the Caucus; and ultimately adopted by the Working Group. The principles include:

- **Affordability and Accessibility**. Offers opportunities for low-income residents to invest in solar

¹

<https://www2.illinois.gov/sites/ipa/Documents/2018ProcurementPlan/2018-LTRenewable-Illinois-Solar-for-All-Working-Group-Comments.pdf>

² www.lowincomesolar.org

through a combination of cost savings and support to overcome financial and access challenges. Creates economic opportunities through a job training pipeline. Supports skill development for family-supporting jobs, including national certification and apprenticeship programs.

- **Community Engagement.** Recognizes community partnerships are key to development and implementation, ensuring community needs and challenges are addressed. Strive to maximize projects located in, and serving, environmental justice (EJ) communities. Allows for flexibility for non-profit/volunteer models to participate, and strives to meet potential trainees where they are, with community-led trainings.

- **Sustainability and Flexibility.** Encourages long-term market development and will be flexible to best serve the unique low-income market segment over time and as conditions change. Program administrator ensures community engagement, statewide geographic equity, and flexibility to meet goals. Job training program includes all training partners in design and implementation. Training offerings should come through diverse channels including utilities, unions, tech schools, non-profits, government agencies, and existing community-based job training organizations.

- **Compatibility and Integration.** Low-income program adds to, and integrates with, existing renewable energy and energy efficiency programs, and supports piloting of financing tools such as PAYS (pay-as-you-save), on-bill financing, PACE or community-led group buy programs. Job training programs will strive to ensure low-income solar installations incorporate workforce development, including coordinating opportunities for job training partners and individual trainees from the same communities that the low-income solar program aims to serve.

The Working Group researched and prepared the enclosed comments to deliver high quality information and recommendations on considerations for the Illinois Solar for All Program and the Long-Term Renewable Resources Procurement Plan. The contents are not intended to reflect universal consensus on any point amongst working group members. These contents reflect extensive deliberation regarding aspects that the Working Group believes are important to the Program's success moving forward.

In closing, we make these recommendations and comments to ensure high-quality implementation for Illinois communities. Communities throughout Illinois need the opportunities and services the Illinois Solar for All Program will provide and the support of groups with substantive experience in the solar industry and low-income solar in particular. Please do not hesitate to contact us with questions or comments in regards to this matter.

Illinois Solar for All Working Group Comments

The Illinois Solar for All program is about to begin its fifth program year. These first four years of the program have seen some noteworthy success but have also revealed significant shortcomings in ILSFA program design and implementation. Of particular note is the underutilization of the Low-Income DG subprogram.

Additional program reform will require a new degree of visibility into the program's successes and failures. The Illinois Power Agency's proposed approach represents a significant improvement over the prior cycle of program evaluation, which our Working Group found to lack inclusive processes and was insufficiently circulated and utilized. The Working Group humbly submits the following comments, in hopes that they help inform and improve on the IPA's proposed approach.

Selecting the Program Evaluator

- The ILSFA Working Group prefers that the consultant selected to perform the Program Evaluation be located in Illinois and that they have existing context for the Illinois renewable energy programs.
- The Working Group also would prefer that the IPA contract with a minority-owned or disadvantaged business for the program evaluation.

Scope of the Evaluation

- We strongly support the IPA's proposal that the program evaluation include a review of similar programs in other states. A side-by-side analysis to compare the different approaches from different states, interspersed with whatever data is available measuring success of those programs, would help inform future ILSFA program reform.
- An analysis, if possible, of the approximate number of qualifying low-income customers who participate in the Adjustable Block Program.
- An evaluation of the ease of participation for community solar subscribers and behind the meter customers, and the paperwork and time burdens involved in the program, including a comparison with similar programs.

Metrics

- Customer satisfaction.
- Approved Vendor satisfaction.
- Measurement for employment of diverse workers in addition to the included broader job opportunity metrics. This could intersect with and support the disparity study requirements under CEJA.
- We encourage the IPA and their program evaluator to assess what metrics are commonly reported by other similar low-income solar programs elsewhere in the country. This will assist in creating a nationwide community of practice regarding program evaluation and help deepen learning on an

ongoing basis. Potential metrics used in other programs are explored in the 2021 report titled “[An Assessment of Evaluation Practices of Low- And Moderate-Income Solar Programs](#)” from the Lawrence Berkeley National Laboratory.

- An additional source of standardized metrics is “[Review of Energy Equity Metrics](#)” that the Pacific Northwest National Laboratory compiled in 2021. Those metrics include:
 - Who is eligible for support programs? Where are energy prices higher or more burdensome?
 - Who is able to make their monthly bill payments?
 - Where have energy efficiency measures been put into place?
 - Are communities satisfied and enrolling in the program?
 - Has the program generated wealth for targeted communities?
 - Has the program generated savings in energy or costs?
 - Has the program improved the communities’ quality of life?

Process for Soliciting Input

- Members of the ILFA Working Group would like the program evaluator to host focus groups and listening sessions with potential or current ILSFA customers in partnership with the Grassroots Education organizations.
- Additionally, we would like to see the program evaluator create a standardized program evaluation survey for Approved Vendors to complete. Our hope is that the questions on this survey are standardized and can be used to track program improvements longitudinally.

Process for Distributing Results and Deliverables

- The annual evaluation and mid-year topic-specific reports are only as helpful as they are utilized and distributed. To ensure that the reports are used to their full potential, the ILSFA Working Group recommend that the program evaluator and the IPA:
 - Host a series of live and recorded presentations for the public to highlight key findings and results after each annual report is launched. We encourage at least one session (or pre-recorded session with staff available) to be held outside of normal working hours;
 - Create a 1-2 page summary fact sheet or infographic highlighting key results and metrics;
 - Schedule a specific, dedicated presentation session with opportunities for Q&A with the Illinois Solar for All Stakeholder Advisory Group indicated in the latest Long-Term Renewable Resources Procurement Plan (LTRRPP) and a separate presentation session with Program Administrator staff; and
 - Ensure that the topics for mid-year reports are generated in response to requests from stakeholders.

Direct Responses to the IPA's Questions

1. Does the proposed evaluation plan of developing one or two brief, focused mid-year reports, with a comprehensive year-end report and summary sufficiently balance the need to fully evaluate the program and the need to provide time in between evaluations to implement recommendations and assess results?

Yes - the ILSFA Working Group believes that this strikes a good balance.

- a. Considering the mid-year reports would be limited four maximum topics in 1-2 reports per year, what topics would stakeholders like to see addressed in the focused mid-year report(s)?

In addition to the critically important example listed in the IPA's proposed approach regarding 1-4 unit residential ILSFA, topics could include:

- *How to properly incentivize residential solar for multi-unit affordable housing properties, including case studies of projects already submitted and approved.*
- *Exploration of options for streamlining income verification processes, including self-attestation of income.*
- *Evaluation of success in connecting customers of low-income energy efficiency and weatherization programs to the Illinois Solar for All program.*
- *Case studies of community solar projects located in population dense areas.*
- *Analysis of ILSFA REC prices compared with other similar incentive programs in other jurisdictions.*
- *Survey of Adjustable Block Program Approved Vendors about why they have chosen not to participate in the Illinois Solar for All program.*

2. What metrics and indicators should be evaluated to assess the Program's incorporation of diversity, equity, and inclusion?

We would like to see these reports directly tied into the broader disparity study and program evaluation required by Public Act 102-0662. Specifically, we would like to better understand whether disadvantaged or minority-owned businesses are finding measurable success in the ILSFA program.

3. The ILSFA evaluation reports should be useful and accessible to stakeholders with a variety of interests and perspectives of ILSFA. What audiences will use these evaluation reports? What particular information would be useful for them, and in what format(s)?

Please see the suggestions above under "Process for Distributing Results and Deliverables."

4. Given that data available for Adjustable Block Program (ABP) projects would not include demographic information of project hosts, is there analysis of ILSFA system metrics against ABP system metrics that would be useful for stakeholders?

The ILSFA Working Group requests that the program evaluator provide a geographic comparison between the two programs. Project location data should be available for each program, so we believe that the evaluator could provide an analysis regarding what percentage of projects are built in certain geographic areas. We would like to see both programs analyzed based on the percentage of projects that are built in low-income, Environmental Justice, and R3 communities.

On a related note, we would like to see this type of locational data made available on an ongoing basis as a downloadable spreadsheet, similar to what is currently available in the Adjustable Block Program. We understand that residential projects will not be listed by addresses but would like to know the zip codes or census blocks of those projects. This data availability would be in addition to the helpful map tool currently available on the ILSFA program website.