

## Diversity, Equity, and Inclusion Stakeholder Feedback

### Response to Illinois Power Agency Request for Stakeholder Feedback

December 3, 2021

**Company:**

Invenergy LLC (“Invenergy”) is a leading privately held developer and operator of sustainable energy solutions headquartered in Chicago. Invenergy has completed development on 17 sustainable energy projects in Illinois and is pursuing additional opportunities in the state. Proud of our Illinois roots, Invenergy has long looked to provide value to the state by siting some of our most innovative projects on Prairie State Soil. Our Grand Ridge Energy Center, three energy technologies co-located at a single site, received Power Engineering and Renewable Energy World Magazines’ 2015 Project of the Year Award for Best Renewable Project as well as Energy Storage North America’s Innovation Award.

Through our growth journey, the state of Illinois and the Illinois Power Agency (“Agency”) have been crucial partners. Invenergy commends the efforts of the state to expedite the decarbonization of our energy grid and the thoughtful expansion of renewable energy deployment.

Invenergy submits the following responses and respectfully request that the Agency consider the feedback provided below.

**Stakeholder Feedback Questions:**

*1. To achieve this goal, should the Agency conduct proactive outreach to businesses and organizations to promote Agency programs and procurements?*

**RESPONSE:** Yes, the Agency should conduct workshops to thoroughly review the EEC requirements, particularly with respect to interfaces and information that developers will need to use and rely upon to secure Equity Eligible persons and contractors for compliance with the statute.

*3. If equity commitments start at 10% of project workforces, and must increase to 30% by the 2030 delivery year, how should the Agency implement that increase, be an even ramp-up over time (e.g. 2.5% per year), or on a different schedule? Should the requirements vary in different regions of the state? Should percentages be adjusted in each successive Long-Term Plan based on observations of prior years’ progress?*

*(i) What challenges will exist to meet the initial 10% requirement? Are there significant variations to consider in different areas of the state?*

**RESPONSE:** The ramp rate from 10% to 30% is closely tied to the success of the programs that certify EECs and of the programs that power producers can use to identify available EECs. Without a clearer understanding of those programs, it would be premature to establish a “reasonable and achievable” ramp rate.

*4. How should “project workforce” be defined for equity accountability provisions? Does it cover just construction and installation activities, or should it also cover work on sales, marketing, finance, etc.? If so, how should those activities be defined and how should the percentages be calculated?*

**RESPONSE:** The definition of “project workforce” should be defined by the project applicant as each company’s structure, employee workforce, business model and development strategy in Illinois is different. The project workforce associated with a DG solar installer may be very different than the project workforce associated with a utility scale solar developer and there is no one-size-fits-all definition. In all cases the IPA should strive to allow applicants the flexibility to meet the EEC thresholds as best they can, particularly in the early years of implementation of the requirement. It goes without saying that the success associated with meeting these equity requirements depends on the success of the program implementation.

*5. What specific items should be required in those compliance plans? Should the report at the end of the delivery year simply update that plan or should it be a wholly new document?*

**RESPONSE:** The Compliance Plan should be per project or provide the ability to apply to multiple projects identified in the form. It should include information such as: an estimate of # of workers; and statement or indication that it will comply with EEC criteria by hiring employees or using contractors. End of the delivery year reports should identify if the work is complete or in-progress, describe whether it hired EEC persons or used a contractor, provide # of EECs and total # of workers on project.