

RESPONSE TO ILLINOIS POWER AGENCY REQUEST FOR COMMENTS ON BEHALF OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION, THE COALITION FOR COMMUNITY SOLAR ACCESS, AND THE ILLINOIS SOLAR ENERGY ASSOCIATION

December 3, 2021

The Solar Energy Industries Association, the Coalition for Community Solar Access, and the Illinois Solar Energy Association (collectively the Joint Solar Parties) appreciate the opportunity to respond to the Illinois Power Agency's most recent solicitation for comments for the Illinois Solar for All Program.

The Joint Solar Parties stress their support for Solar for All and their desire to see all Solar for All programs succeed. In the spirit of success for all, the Joint Solar Parties provide some recommendations both for the current program/job training administration and also for particular new programs (for instance related to low-income customer-owned systems) to put Solar for All (at least in the Joint Solar Parties' view) in the best position to succeed. The Joint Solar Parties anticipate that changes to Solar for All will be iterative and look forward to continued participation.

Interaction with other funding/grant opportunities

Public Act 102-0662 creates several new funding opportunities that are external to the Illinois Solar for All Program but could help support projects and participants in the Program. These include the Climate Bank at the Illinois Finance Authority, the Illinois Clean Energy Jobs and Justice Fund, and the Equitable Energy Upgrade Programs.

1. The boards of these entities could include solar developers who participate in ILSFA. What considerations and protections should be put into place to prevent conflicts of interest?

JSP RESPONSE: The Joint Solar Parties note that two layers of conflicts of interest protections should be in place. First, the IPA should work with the Illinois Finance Authority and DCEO/other state agencies or funds to identify conflicts of interest, which are more likely to come up at those organizations than the Solar for All process. Each board should have its own conflict of interest policy, which is primarily the board's own responsibility. Second, to the extent that an organization is both a community group (or customer) involved with a Solar for All application and an employee or board member is on one of the aforementioned program boards, that status should be disclosed to the IPA along with the application.

2. Should adjustments to REC prices or required savings levels be considered for projects utilizing these programs, similar to the increased savings level currently required for nonprofit/public facilities projects that utilize the Investment Tax Credit?

JSP RESPONSE: No. The Joint Solar Parties appreciate that the REC pricing for the Adjustable Block Program and Solar for All is based on the CREST-model, which builds

up a price based on costs. However, applicants are not utilities and the principles of cost-based ratemaking should not apply. The funding sources will make Solar for All more appealing for both developers and customers, which is a positive outcome. The Joint Solar Parties note that in particular the Clean Energy Jobs and Justice Fund and Equitable Energy Upgrade Program are not meant as generalized incentives but target specific projects with specific features/customers; allowing customers or developers (as the case may be) to absorb and allocate those values will further the goals of those programs and not re-skew the playing field toward other Solar for All projects.

3. Are there other external funding opportunities which the Agency should account for in establishing ILSFA incentive levels?

JSP RESPONSE: The Joint Solar Parties cannot predict the outcome of federal legislation, but are optimistic that there may be changes to the Investment Tax Credit (including potentially “direct pay” provisions) that may provide benefits to LMI customers and projects sited in low-income and underserved communities in a way that the current tax credit structure does not. The Joint Solar Parties anticipate studying the results of federal legislation in great depth once it passes.

Separately, the Joint Solar Parties wish to highlight that the Solar for All program has some additional development costs (as separate from customer acquisition, customer credit, and minimum savings) from the Adjustable Block Program due to the additional site visits and photos (under the rubric of quality control), staff meetings, and duplicative updates. The installation cost should take these additional steps into account when setting the installation cost. Additionally, delays in getting customers qualified through the Program Administrator lead to development delays and carrying costs.

Environmental Justice Communities

Public Act 102-0662 directs that the environmental justice communities as defined for ILSFA be used in defining the location of “equity investment eligible communities.” Section 8.15 of the current Long Term Plan details the CalEnviroScreen indicators that were applied to determine the census tracts that would be designated using data from the US EPA’s EJSCREEN tool, which is update yearly. ILSFA’s EJ maps have not been updated (other than through the community self-designation process) since early 2019, which used EJSCREEN data published in 2019, calculated from data collected by the U.S. Environmental Protection Agency between 2014 and 2019.

4. When and how frequently should the environmental justice maps be updated using the most recent EJSCREEN data?

JSP RESPONSE: The Joint Solar Parties understand the Solar for All Working Group proposed an update every three years; the Joint Solar Parties do not object to that approach but also would support updates tied to the LTRRPP revision process to the extent there is new census data and/or U.S. EPA input data available. Development timelines for these projects are long and certainty about eligibility is a key initial question for developers and communities interested in these projects. Thus, while environmental justice maps should

be updated on a regular basis, program requirements should be based on maps that have been publicly available for at least 24 months prior to the application window opening. Alternatively, there should be a grace period before removing the Environmental Justice designation from any area for projects that were being developed in good faith when the project location did have an Environmental Justice designation.

Grassroots Education Funding

Section 1-56(b)(3) of the IPA Act (as modified by Public Act 102-0662) includes language that specifies that grassroots education funding be used to “assist in community-driven education efforts related to the Illinois Solar for All program, including general energy education, job training program outreach efforts and other activities deems to be qualified by the Agency,” with the caveats that funds go to “community-based groups and other qualifying organizations” and that “funding shall not be used to support the marketing by solar project development firms and organizations, unless such education provides equal opportunities for all applicable firms and organizations.”

5. The current model of grassroots education utilizes localized education campaigns conducted by grassroots non-profits familiar to their communities. What types of “other activities” could be funded through community-based groups and other qualifying organizations that could further “community-driven education efforts”?

JSP RESPONSE: Solar for All training programs should include at least one series of programs on grassroots community engagement and understanding the economics of different behind-the-meter and community solar offers. The Illinois electricity market is relatively complex (especially for behind-the-meter) and grassroots educators should have access to quality training that provides them both with *methods* for grassroots engagement and proper *substantive* information to ensure that local communities are getting the right information. The Joint Solar Parties wish to be clear that nobody expects grassroots organizers to be salespeople for Solar for All offers, but a basic (or more advanced) understanding of the products and benefits allows grassroots educators to provide better information and create more informed local communities.

At least one member company involved in Solar for All estimates that grassroots educators are a negligible referral source for new customers, suggesting that even though grassroots educators are not intended to market for a particular firm they also do not appear to be moving the needle for the market overall. The Joint Solar Parties respectfully suggest that the IPA study the efficacy of the grassroots education program as a method of getting customers to choose Solar for All (rather than a specific Approved Vendor). The Joint Solar Parties further respectfully suggest that grassroots educators could take non-marketing steps that a customer must take to benefit from the Solar for All program, such as facilitating income qualification and give income-qualified customers information about current offers and market participants. Grassroots educators should also have access to information about Solar for All products and services so they can help educate customers about their options.

Responding further, the Joint Solar Parties recommend that any community-driven or non-profit organization that focuses on community development or community advocacy should have the option to apply for and receive funding to promote Solar for All.

Energy Sovereignty

Section 1-56 (b)(2)(A) of the IPA Act (as modified by Public Act 102-0662) directs the IPA to reserve a portion of sub-programs for projects promoting energy sovereignty “through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.” It also specifies that “local people have control of the project and reap benefits from the project over and above energy bill savings.” Questions related to energy sovereignty for specific sub-programs are asked below. The following are general questions across sub-programs.

6. What should be a general standard for “ownership? Is it majority ownership, full ownership, or some other standard?

JSP RESPONSE: The Joint Solar Parties recommend majority ownership should be considered ownership. This allows individuals and entities to own a system and reap those benefits without being totally at risk for both system maintenance and (particularly for community solar) administration. Managing renewable energy systems—particularly larger systems and community solar—is complex and greatly benefits from professional management, which is not easily available via contract for the low-income community.

7. Should requirements for ownership be defined over a specific time period? For example, to take advantage of federal tax incentives should project financing models that include the transfer of ownership after a set period of time be allowed? If so, what should be the consequences if ownership is not transferred?

JSP RESPONSE: The Joint Solar Parties recommend a distinction between a “pathway to ownership”—which would include a conveyance or purchase option at a specific point—and a structure that initially starts with customer majority ownership. Depending on the structure of the Investment Tax Credit after anticipated federal legislation, there could be benefits for LMI system owners where the current system has limited (if any) benefits for LMI system owners. If not, having a pathway to ownership that leads to customer ownership before the end of the Solar for All REC Contract should be considered as well.

8. How should “providing services to low-income households” be defined and measured? Can the Agency’s current approach of critical service providers used for the non-profit/public facilities sub-program be used as a proxy?

JSP RESPONSE: The Joint Solar Parties believe this is a reasonable approach. The critical service provider requirement has worked well in the existing non-profit/public facilities program.

9. Should REC prices be higher for projects that promote energy sovereignty? What factors should be considered as drivers of higher costs for these projects? What provisions should be included to ensure that the benefits of those higher prices flow through to the project owners?

JSP RESPONSE: In the Joint Solar Parties' view, it depends on whether majority ownership is a requirement at Energization or at the end of a pathway to ownership. Under a pathway to ownership structure, it is clear that the Approved Vendor will have O&M obligations to the system during the REC Contract but there is no explicit requirement for O&M support after that point. However, under a joint ownership structure, that responsibility would have to be allocated between the owners. If there is a higher REC price, the minimum terms and conditions should require the developer (or its designee) to agree to O&M for a certain extended term—for instance, 25 years—unless the developer or its successor remains a long-term minority owner.

10. Are there other provisions that should be considered for projects that promote energy sovereignty such as different project application requirements, collateral requirements, project development timelines, etc.?

JSP RESPONSE: Generally speaking, no, except to the extent that the Approved Vendor must agree to an extended O&M term.

Distributed Generation Sub-program

Section 1-56 (b)(2)(A)(ii) of the IPA Act (as modified by Public Act 102-0662) instructs the Agency to “make every effort to enable solar providers already participating in the Adjustable Block program [in the small distributed generation block] to easily participate in the [1-4 unit distributed generation] program [...] and vice versa.”

11. What barriers do developers of small distributed generation projects who participate in only the Adjustable Block Program face that could be reduced to promote their participation in ILSFA?

JSP RESPONSE: The Joint Solar Parties collected several recommendations from participating Solar for All Approved Vendors, set out below:

- Solar for All and the Adjustable Block Program should have the same portal/platform, but additional requirements for Solar for All as applicable by subprogram. Further, the portal should be able to auto populate from a contract like the ABP portal.
- The current Solar for All portal requires duplicative uploading of the same document (between five and ten times in some instances in the same portal), which increases the administrative time spent applying projects and increase errors between contract and disclosure. With at least 30 minutes for entry in each disclosure, the required staff and customer time is not efficient nor sustainable to bring in new Approved Vendors for the LIDG program.

- The photograph of every module and the meter are unnecessary if the system is permitted, inspected, and interconnected—the Joint Solar Parties note that it is to the Approved Vendor’s detriment if the system underperforms because it will result in a clawback under the Solar for All REC Contract. Joint Solar Parties recommend instead an affidavit or document that is filed with the Solar for All Program Administrator that attests to the materials used in Solar for All projects.
- Excessive follow-up regarding one-line drawings or photos regarding whether the system meets code, even after it passes inspection (especially given the Solar for All program does not, and in the Joint Solar Parties’ opinion need not, have licensed inspectors on staff). ILSFA Program Administrator should utilize and rely on state licensed code officials and Commission interconnection rules. If an Authority Having Jurisdiction (AHJ) and Utility pass inspections and interconnection, there is no need to have uncertified, unlicensed inspectors second-guessing the work of the AHJs and utility. Approved Vendors must pass inspection and interconnection for every system to get paid, and to get the system turned on to ensure safety of household. Staff are not licensed inspectors, so they should not question the approvals or review that a licensed inspector and utility provide on code requirements.
- Reporting on job training program graduates usage should be at the portfolio level rather than the individual project level, especially if the number of hours a job training program graduate spends on each project are relatively small but the number of projects is high (or some work is shared between several projects/not easily allocated between projects, etc.).

The Program Administrator has taken a number of steps to ease access to ILSFA in the past program year, including creating an offers sheet listing standard offers available from ILSFA Approved Vendors, creating a referral process to connect interested potential participants with Approved Vendors, and the option for the potential participant to complete the income verification process with the Program Administrator directly. Although activity in the LIDG sub-program has grown slightly in the past year, this sub-program still needs substantial growth.

12. What are other ways that ILSFA Approved Vendors can be supported to increase interest in developing ILSFA residential solar projects?

JSP RESPONSE: The Joint Solar Parties collected several recommendations from participating Solar for All Approved Vendors, set out below:

- Address some of the issues raised in response to Question 11 above; the reduction in time spent managing the portal is expected to increase the amount of time sales and administrative staff can focus on identifying and soliciting new customers.
- Hold online sessions and webinars.
- Create an easy-to-read flyer and create bilingual/multi-lingual flyers.
- Work with Local Administrative Agencies and other administrators to connect participants in low-income programs such as LIHEAP to Solar for All.
- Create a structure that allows utilities to identify low-income customers (who are prohibited from choosing an ARES under Section 16-115E of the Public Utilities Act) to receive program or company-specific sales literature.

- Create a peer mentoring program and resources for new entrants to get up to speed on program requirements from the Program Administrator.
- Simplify the project review process and right-size the number of quality control check-in for the different types of projects (community solar projects versus residential projects).
- Adoption and use of same production and shading modeling as required and accepted by the ABP. There should not be two different requirements or expectations between ABP and ILSFA.

13. How can Approved Vendors be supported to encourage project development in areas that are currently underserved by ILSFA Approved Vendors?

JSP RESPONSE: The Joint Solar Parties do not have specific recommendations at this time other than identification of such areas and identification of barriers specific to serving customers in those areas (if any). In the interim, the Joint Solar Parties suggest consideration of increasing grassroots outreach in those areas.

14. If recommending changes to REC prices, what specific cost components would need adjustment?

JSP RESPONSE: Soft costs are underestimated by the CREST model, including the time and expense to move a project through the Solar for All project application process and individual site evaluation (due to roof/home conditions). In addition, soft costs of delays and repeated follow-up regarding income qualification are not currently accounted for.

In terms of direct costs, the costs of marketing when it is difficult to target most methods of marketing (such as direct mail) to qualifying low-income customers should reflect that much of the marketing is by necessity going to ineligible customers, or eligible customers that do not have an appropriate site for solar.

15. What should ongoing stakeholder engagement/feedback process look like to inform efforts to expand LIDG development?

JSP RESPONSE: The Joint Solar Parties do not have recommendations for the stakeholder process at this time.

Illinois Solar for All has a requirement that incentives deliver tangible economic benefits to eligible low-income participants. In master-metered buildings, program eligibility currently requires the owner to commit to passing along at least 50% of the energy savings to all the tenants, regardless of income levels, and communicate that these benefits are a result from the installation of solar.

16. How can “tangible economic benefits” be better defined?

JSP RESPONSE: Tangible economic benefits in multi-family properties should either go directly to the tenant *or* to tenant services such as the program provider. The Joint Solar

Parties understand that the Program Administrator has not accepted tangible benefits as including benefits to the service provider that is providing services to the tenant.

In addition, for low-income DG that qualifies for net metering under Section 16-107.5(l)(1)(B) (multi-tenant buildings that are not “subscribers”), either the savings should be reduced to 30% or the REC value should reflect that the value received looks like a community solar credit (i.e. does not offset usage) rather than a behind-the-meter net metering credit (does offset usage for Subtype (d) customers). This distinction is important because the reduced net metering value makes it more challenging for such projects to pencil with the 50% savings requirement, even with the enhanced Solar for All REC price.

17. What does energy sovereignty look like for multi-family projects?

JSP RESPONSE: The Joint Solar Parties note that it depends on the ownership of the building and units. The Joint Solar Parties are unsure that it makes much sense to insist on customer ownership of a solar system if the building is a rental building and thus the tenant-customers would be able to leave their apartment at will but would have to sell or otherwise transfer their ownership in the system (or be forced to bill and collect from the new tenant).

Non-Profit and Public Facility Sub-program

Public Act 102-0662 of the IPA Act (as modified by Public Act 102-0662) expands the Adjustable Block Program in Section 1-75 (c)(2)(K)(iv) directing the creation of a block dedicated for solar projects installed at public schools, with priorities for projects located within environmental justice communities.

18. Since the Adjustable Block Program will now include a category specifically for public schools should public schools no longer be eligible to participate in ILSFA?

JSP RESPONSE: The Joint Solar Parties note that the Public School program is likely to have more than sufficient capacity over time for projects on interested schools so there is likely much less need for Solar for All to accommodate public schools. The Joint Solar Parties also note that higher education and private schools are not included in the Public Schools program.

19. Are there types of schools that wouldn't qualify under Section 1-75(c)(2)(K)(iv) that should still be considered eligible for ILSFA? Section 1-56 (b)(2)(E) of the IPA Act (as modified by Public Act 102-0662) creates a new subprogram for low-income large multifamily solar projects, with incentives targeting residential buildings with 5 or more units.

JSP RESPONSE: Private or parochial schools would not qualify for the Public Schools program; the Joint Solar Parties do not recommend that private or parochial schools qualify for Solar for All unless the school's primary mission is serving low-income students generally or a particular low-income community.

20. Should multifamily residential housing be no longer eligible for the Nonprofit/Public Facilities sub-program and only eligible for the new low-income large multifamily solar sub-program?

JSP RESPONSE: The Joint Solar Parties believe that multifamily residential housing should no longer be eligible for the Nonprofit/Public Facilities subprogram.

Section 8.6.3 of the current Plan requires the organizations that host of Nonprofit/Public Facilities projects to be “a critical service provider for the community,” and provides examples of “youth centers, hospitals, schools, homeless shelters, senior centers, community centers, places of worship, affordable housing providers including public housing sites.” Section 4.2 of the ILSFA Approved Vendor Manual expands on these examples to a list of over 25 other qualifying non-profit entities, and Approved Vendors have requested the Program Administrator consider other entities as a Critical Service Provider.

21. Should the criteria for critical service providers be refined to include a requirement that the facility demonstrate that it provides a majority of its efforts/activities to low-income participants.

JSP RESPONSE: The Joint Solar Parties note that such a demonstration may be cumbersome and onerous for the customer where the service provider happens to have a large number of low-income clients but that provides services across income levels. Examples would include hospitals or community centers located in or near low-income areas that draw customers at a range of income levels. In addition, these customers (such as the aforementioned hospital or community center) may not track the income level of their clients with specificity. The Joint Solar Parties suggest that the IPA and the Program Administrator develop guidelines for exercising discretion for service providers located in or near low-income areas that cannot easily or definitively demonstrate the majority of effort/activities are on behalf of low-income clients.

22. Are there changes to the list of critical service providers that should be considered?

JSP RESPONSE: The Joint Solar Parties have no recommendations at this time.

Low-Income Community Solar sub-program

Section 1-56 (b)(2)(B) of the IPA Act (as modified by Public Act 102-0662) detailing the Low-Income Community Solar sub-program states, “The Agency shall reserve a portion of this program for projects that promote energy sovereignty through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, or community-based limited liability companies providing services to low-income households. Projects that feature energy ownership should ensure that local people have control of the project and reap benefits from the project over and above bill savings.

23. What does community ownership of a community solar project look like?

JSP RESPONSE: The Joint Solar Parties recommend that community ownership be expansive enough to include, but not be limited to, the following:

- Ownership of the system by a corporate form (such as an LLC), which is in turn owned by natural persons or trusts on behalf of natural persons in or near the community in question; and
- Ownership to include temporary changes in ownership as part of financing, such as tax equity financing
- Some level of retained ownership by a long-term owner/operator that provides maintenance, Solar for All REC Contract administration/Approved Vendor services, as well as other services so community members are not forced to operate an Approved Vendor or a system.

While the Joint Solar Parties acknowledge that these structures are not the same as joint ownership of a particular asset by only natural persons living in a community, these approaches are intended to add value to community members, add protections, and relieve community members from some of the administrative and operational burden.

24. How can the financial risks to communities that come with long term ownership be managed? In particular, costs associated with subscriber acquisition and turnover, subscriber/bill management, and equipment maintenance such as future inverter replacements?

JSP RESPONSE: See response to Question 23. Responding further, if the system is fully owned by natural persons in the community, either those natural persons will have to form a new entity to act as an Approved Vendor (which the Joint Solar Parties do not recommend given the technical and administrative complexity) or will have to pay a third party for Approved Vendor-as-a-Service.

25. What factors should be considered in determining appropriate incentives for projects demonstrating energy ownership?

JSP RESPONSE: The Joint Solar Parties have no specific recommendations other than to note that the incentive should not only reflect the direct costs but also the risk to the Approved Vendor if there are heavy restrictions on potential subscribers.

26. What would individual ownership by a low-income household in a community solar project look like?

JSP RESPONSE: The Joint Solar Parties are not sure that approach would be viable without a third-party Approved Vendor-as-a-Service provider, which (due to the complexity and risk to the Approved Vendor) is likely to have a cost.

27. What benefits constitute “over and above bill savings”?

JSP RESPONSE: The Joint Solar Parties do not know what was intended by the legislative language, but viewing the language in a vacuum the Joint Solar Parties imagine that third-party monetization of tax equity financing and the Smart Inverter Rebate would

be included. Given that the RECs are being sold to the utility counterparty (thus the owners cannot claim environmental benefits) and the subscribers do not receive direct financial benefits other than bill credits, the Joint Solar Parties are unable to identify more such benefits at this time.

Equity/Workforce Development

Section 1-56 (b)(5) of the IPA Act (as modified by Public Act 102-0662) states that “The third-party administrator’s responsibilities shall also include facilitating placement for graduates of Illinois based renewable energy-specific job training programs, including the Clean Jobs Workforce Network Program and the Illinois Climate Works Pre-apprenticeship Program administered by the Department of Commerce and Economic Opportunity and programs administered under Section 16-108.12 of the Public Utilities Act. To increase the uptake of trainees by participating firms, the administrator shall also develop a web-based clearinghouse for information available to both job training program graduates and firms participating, directly or indirectly, in Illinois solar incentive programs.”

28. How should “facilitating placement” go beyond sharing of information between graduates and potential employers?

JSP RESPONSE: The Joint Solar Parties recommend the following:

- Develop a searchable database for employers identify graduates and for graduates to search for opportunities
- IREC has a database and regular updates that the IPA and Program Administrator might emulate (<https://irecusa.org/training-to-job-pipelines/>)
- The Program Administrator should provide graduates with instructions and support in navigating the portal
- Part of posting jobs should include providing the Program Administrator with HR contacts for the Program Administrator can facilitate conversations
- The Program Administrator should run an email listserv that promotes the database and features jobs and graduates
- The Program Administrator should facilitate virtual solar “speed dates” where graduates can learn more about companies that are hiring and the positions available so the graduates have a better sense of what to apply for and information that will be helpful in the interview process
- The Program Administrator should hold at least quarterly job fairs around the state (or, if necessary due to COVID, virtually)
- Provide graduates with the option to participate in mentorship programs with Program Administrators to help graduates learn skills to be successful in interviews, translate their life and work experiences into transferable skills for a resume, and develop an online job candidate profile
- Provide graduates with the option for quarterly one-on-one check-ins regarding their job search and any support or resources they may need, ensuring that graduates are supported until they find employment and potentially into their first year of work. This could be supported by an organization that specializes in career coaching or counseling.

- Create a regular, quarterly, opportunity, virtual and/or in-person for graduates to discuss their first-year post-graduation, structured as a discussion-based forum. This will allow the connection of interested graduates across the industry and provide a setting for peer support, and the Program Administrator can receive real-time updates on the graduates' experience and on how the training programs might be improved to ensure more effective pathways to employment.

29. What are key features a clearinghouse should offer?

JSP RESPONSE: A public facing job board so all (including potential training program applicants) can see available solar jobs, and a way for graduates to immediately access an online profile/resume for participating graduates (akin to LinkedIn, although without requiring graduates to use that particular platform). Similarly, each job poster should be required to maintain a profile with up-to-date contacts, company information, and job postings. The Program Administrator should provide a way—whether through online chat or another function—to respond to questions, particularly from graduates.

In addition to the above key features, the clearinghouse should provide information to employers about applicant training so that employers are able to narrow potential employee prospects. Further, the IPA should consider including videos that describe the plethora of different roles within the solar company/industry. The clearinghouse should also identify the key skill competencies that a graduate has completed after participating in job training programs.

The Joint Solar Parties believe it is important that all of these recommendations set out in response to questions 28 and 29 should be connected to the State of Illinois' broader workforce programs. To create sustainable job search, workforce pipeline successes, the solar industry, must become part of, or connected to, the existing job search and workforce development programs through IDOL, DCEO, and other state agencies.

30. How can the Program Administrator ensure that trainee and job listings are updated regularly by the appropriate parties?

JSP RESPONSE: Contacts should be updated at least monthly from training programs, and companies posting should be required to commit to reviewing postings at least every quarter.

The Joint Solar Parties further recommend that the annual reports include a question as to whether an Approved Vendor used the clearinghouse.

Section 1-56 (b)(2) of the IPA Act (as modified by Public Act 102-0662) states that “The Agency shall make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program. These efforts may include, but shall not be limited to, proactive support from the program administrator, different or preferred access to sub-programs and administrator-identified customers or grassroots education provider-identified customers, and different incentive levels.”

31. What should be the definition of “small and emerging businesses”? May businesses be either “small” or “emerging”? At what point is a business no longer “small and emerging”, and how should the Agency track those business-specific changes?

JSP RESPONSE: The definition should be consistent with the definition of “small business” used by the Business Enterprise Program of the state.

32. What specific barriers are unique or particularly acute to small and emerging businesses?

JSP RESPONSE: Developing any solar project involves a fair amount of risk and upfront capital outlay (or short-term debt) to take a project to the point where it is approved for inclusion in a Product Order in a REC Contract. The smaller/newer the business, the greater portion of their capital is likely to be used or the greater the costs of raising debt. In addition, small and emerging businesses are more likely to lack the experience or the bandwidth to address the variety of challenges related to not only developing solar but also dealing with the specific obligations of the Solar for All program.

33. How should small and emerging businesses in low-income and environmental justice communities be specifically targeted for support?

JSP RESPONSE: New and emerging businesses should be allowed and encouraged to partner with preexisting Approved Vendors to develop expertise into the whole process from early-stage development to incentive application to (as applicable) selling to a long-term owner/operator or financing. Each of these steps requires very different skill sets, experience, and expertise. Going through the process several times with experienced practitioners will increase the chances that on their own the small and emerging business will have the knowledge and wherewithal to handle the inevitable bumps, issues, risks, and challenges that come up in the development process. Further, the IPA should establish an incubator specifically for low-income and Environmental Justice community-based small and emerging businesses.

In parallel, the Program Administrator should also develop a standard curriculum and training for new and emerging business Approved Vendors. While some information can only be taught by industry participants (examples: what types of reps and warranties are common in financing agreements? How to make a system appealing for long-term owner/operators?), interface with the program itself is best taught by the Program Administrator.

34. If different incentive levels (increased REC prices) are warranted, what methodology should the Agency employ for considering higher small and emerging business incentive levels?

JSP RESPONSE: The Joint Solar Parties support higher incentives for small and emerging businesses in the form of REC adders, but further support those incentives being available when an experienced Approved Vendor partners (whatever that structure looks

like) with the small or emerging business to compensate the established Approved Vendor for (to put it in stark terms) training their future competitors.

Section 1-56 (b)(2) of the IPA Act (as modified by Public Act 102-0662) states that “The Agency shall strive to ensure that renewable energy credits procured through the Illinois Solar for All Program and each of its sub-programs are purchased from projects across the breadth of low-income and environmental justice communities in Illinois, including both urban and rural communities, are not concentrated in a few communities, and do not exclude particular low-income or environmental justice communities.”

The Project Selection Protocol as refined for the 2021-2022 program year implemented a Regional Environmental Justice Score point attribute in the Low-Income Community Solar sub-program to prioritize selection of community solar projects in areas where the distribution of selected projects is disproportional to the region’s distribution of environmental justice communities.

35. Previous stakeholder feedback, including that received during the summer of 2021 for the development of the now withdrawn draft Second Revised Plan, suggested the need for stability and sufficient advance notice of changes to the Project Selection Protocol. If the Project Selection Protocol is further updated when should that new Project Selection protocols take effect? Should it be for Program Year 2022-23 (beginning Summer 2022) or Program Year 2023-24 (beginning Summer 2023)?

JSP RESPONSE: Depending on when the update is complete, 2022-23 may be a reasonable starting point. However, especially for larger systems or community solar, much less than six months means that the systems applied may not be as responsive to the criteria due to the extended lead time for development of such systems even in the general Adjustable Block Program, much less with the specialized requirements of Solar for All.

36. How should the Agency promote development in underserved areas if a sub-programs is not oversubscribed and thus requiring use of the Project Selection Protocol and instead the subprogram is accepting projects on a first-come, first-served basis?

JSP RESPONSE: The Joint Solar Parties recommend on one hand REC adders for consistently underserved communities (which may change from program year to program year as the market responds) and on the other hand increased grassroots outreach and outreach to local administrative agencies and community groups on the other.