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July 22, 2022

Submitted Via Email To: IPA.Solar@illinois.gov

Re: Little Village Environmental Justice Organization – Response to Illinois Solar for All Evaluation Comment Request

To Whom It May Concern:

Please be advised that I represent the Little Village Environmental Justice Organization (LVEJO). LVEJO is an Illinois not-for-profit environmental justice advocacy organization based in the Little Village neighborhood of Chicago, Illinois. LVEJO strives for a clean and just environment for local residents and for residents of similarly situated Illinois communities. LVEJO seeks to empower communities through environmental organizing and youth programming for environmental justice, cleaner air, open space, and a sustainable future.

LVEJO appreciates the opportunity to comment on IPA's specific questions regarding the Illinois Solar For All (ILSFA) program. As an environmental justice organization, LVEJO has a great interest in the implementation and success of the ILSFA program. Given the time limitation in submitting these limited comments, LVEJO's below contributions are not exhaustive. LVEJO is open to other options, suggestions, and opportunities and looks forward to working with IPA during the ongoing revisions to the ILSFA program.

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

LVEJO appreciates the Agency's push to develop metrics for incorporating Diversity, Equity, and Inclusion (DEI) in the ILSFA. Among the Agency's already-proposed metrics, those evaluating the benefits of projects in Environmental Justice (EJ) communities will provide some information on the subject. Beyond that, there is also a major opportunity to measure the program's work towards DEI goals through the already-included job and job opportunity metrics. LVEJO proposes that these same job metrics should also be measured specifically in terms of workers from diverse or equitable backgrounds. Evaluating DEI inclusion on the customer and project side is certainly important, but the current list of metrics do not address DEI inclusion on the industry side. Including metrics for measuring job growth for equitable workers would address that hole in the reported data.

The proposed job opportunity metrics already capture a wide amount of information concerning job growth in the industry. Including that same information for positions specifically created for or taken up by diverse workers should allow the administrator and stakeholders to better track over time how the program is meeting its DEI goals for the industry. This aligns with the IPA's larger DEI goals from CEJA to expand the "priority access to

the clean energy economy for businesses and workers [from diverse and traditionally excluded backgrounds]”. 20 ILCS 3855/1-75(c-10). This also matches with similar data that the Agency will be collecting for participants in the Adjustable Block Program through the Minimum Equity Standard Compliance Plans that Approved Vendors are required to file. Having similar information for ILSFA will allow for a better comparison of how DEI goals are being met in the different programs.

Additionally, LVEJO encourages the Agency to include comparisons to other DEI initiatives as a part of its analysis of other states’ low- and moderate-income solar programs. This analysis provides a prime opportunity for the Agency to examine what DEI initiatives other states have created in similar programs, while examining what strategies have worked or not. This can help in the future when the Agency updates its own DEI initiatives. It can also give the Agency further insight into other useful metrics it can use to track its DEI goals in the future.

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)?

LVEJO emphasizes that it and similar community environmental groups are a major audience for these evaluation reports. LVEJO plans to primarily use the information to determine how the Program is meeting its DEI goals and to evaluate the benefits the program provides to EJ communities. This information will help LVEJO, and similar organizations, better assess how best to participate in both future stakeholder feedback events and future Agency rulemakings. The information will also help LVEJO and other similar organizations to better plan their involvement with the Program through work such as grassroots education programs. Ensuring that these reports are open and accessible to the perspective of EJ organizations should be a priority for the Administrator in designing them.

These reports also need to be presented in a manner that is accessible for smaller community organizations. Alongside the more detailed full reports, the Agency should also release short, 1-2 page fact sheets or infographics that summarize key findings. These shorter summary pages are helpful for community organizations to be able to easily disseminate key findings to their members quickly without having to reconstitute the entire report.

Thank you for your consideration of these comments.

Sincerely,

/s/ Kenneth Walther

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