

Illinois Power Agency  
160 North LaSalle Street  
Chicago, Illinois 60601

InClimate, Inc. - Program Administrator

### **Comments on Approved Vendor Annual Report Diversity Reporting**

Carbon Solutions thanks the IPA and Program Administrator for the opportunity to comment on the Annual Report. Growing a robust diverse workforce is vital to the success of the solar industry. We view this as a very important metric to capture and believe that capturing this information will help enable the industry to increase the diversity of its workforce.

Our comments below are focused around two main items. The first is making sure that the data collected is both accurate and useful. The second is simply the best way to logically gather this information. We are especially focused on these two points given the wide array of solar companies we work with as an Aggregator in the ABP program. We want to ensure that this important information is collected in such a way that it is both meaningful and helpful for future growth in the industry.

#### **Reporting for Approved Vendor's Designees (Indirect)**

*Indirect means hiring and employment conducted by the Approved Vendor's designees, installers, marketing/sales sub-contractors, etc. as it relates to the marketing, sale, development, and operation of projects participating in the Adjustable Block Program.*

We work directly with many Designees, serving as their Approved Vendor in the ABP program. Several of these Designees in turn hire subcontractors to work for them and those subcontractors in turn often have other subcontractors. Due to the extremely expansive nature of these relationships we suggest that Diversity Reporting is just collected from the Designees or subcontractors that an Approved Vendor is working with directly and not from subcontractors of subcontractors (or subcontractors of subcontractors

subcontractors). This complexity challenges both the accuracy and practicality of getting reporting several layers removed. This is especially true for work that has already been completed and for work that has been by companies that no longer work together.

Due to the complexity of these relationships we also recommend that diversity reporting is something that is collected directly from both Designees and Approved Vendors for future program years. We understand that a system of Designee level registration is in the works and will be coming out some time in the future. Once this more comprehensive Designee registration is available, diversity reporting at the Designee will enable reports to be both more accurate and comprehensive. Collecting data from Designee level will also help reduce the amount of double counting that occurs as many Designees are working with multiple Approved Vendors.

### **Separation of Diversity Reporting and Annual Report for Initial Program Year**

*The Annual Report is due on July 15, 2020. In recognition of the short time to consider these draft requirements, and the subsequent finalized version, Approved Vendors may use the 90-day period specified in the Revised Plan to update and/or cure any deficiencies in the Annual Report to submit this information. In other words, Approved Vendors should endeavor to submit job training and workforce diversity information by July 15, 2020 if they have the necessary information already collected and available, but may submit job training and workforce development information at a later date. The 90-day period ends October 13, 2020*

*Finally, the opening of the Approved Vendor Annual Report portal is now planned for July 1, 2020 (as opposed to the June 22, 2020 date from the Request for Comments). As noted in the Request for Feedback, Annual Reports are due on July 15, 2020, but will not initially contain spaces for entry of diversity and job training information. Those categories will be added upon completion of this stakeholder feedback process.*

We understand that diversity reporting is not yet available in the Annual Report section of the AV portal. We also understand that it will not be in the portal prior to the due date for Annual Reports. Given the challenges of gathering this information and the potential dire consequences (default of REC Contract) for not completing and or curing an Annual Report, we recommend that at least for this initial program year the Diversity Report is separate from the Annual Report.



CARBON SOLUTIONS GROUP  
1130 W Monroe  
CHICAGO, ILLINOIS 60607  
800.499.1458 TEL  
312.803.1833 FAX  
[carbonsolutionsgroup.com](http://carbonsolutionsgroup.com)

CSG is fully supportive of Diversity Reporting and looks forward to collecting this information from our Designees, however, given that these requirements will not even be available to us until after the Report's due date they should be included in a separate report.

Thank you for reviewing our comments. We look forward to the development of this important report and continued growth and diversity in the industry.

Sincerely,

Dylan DeBiasi