

To: Illinois Power Agency
From: Participants in the Illinois Solar for All Working Group
Date: 7/2/2020
Re: Illinois Solar for All Working Group Comments on Approved Vendor Reporting (2020)

Dear Illinois Power Agency & Program Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the proposed project selection protocol. 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 is co-facilitated by Juliana Pino of Little Village Environmental Justice Organization and MeLena Hessel of Environmental Law and Policy Center. Over 75 participants include representatives from the following organizations and others:

Blacks in Green	Prairie Rivers Network
Central Illinois Healthy Community Alliance	Sierra Club, IL Chapter
Central Road Energy LLC	Seven Generations Ahead
Chester Kolodziej SustainRockford Inc.	Vote Solar
Environmental Law & Policy Center	

Working Group Process

The Working Group began convening in January 2017, and has had monthly full-group meetings until the present time. From time to time, the Working Group operates with sub-teams or break out groups that focus on specific areas relevant to the policies at hand and future work on the program. These sub-teams have included: Program Administration & Evaluation, Consumer Protection & Financing, Education &

Engagement, Job Training, and Project Workshop.

Working Group Commenting and Engagement History for IL Solar for All

- A draft White Paper was delivered to the IPA on May 5, 2017.
- Many Working Group participants attended IPA's May 2017 workshops and helped develop responses to IPA's June 6, 2017 Request for Comments on the Long-Term Renewable Resources Procurement Plan.¹
- A final White Paper was published on July 11, 2017 on lowincomesolar.org.²
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.³
- 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 InClima 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.

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*⁴ 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 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.

¹ <https://www.illinois.gov/sites/ipa/Documents/ILSfA-Working-Group-Response-RequestforComments.pdf>

²

http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper_Final_wAppendices.pdf

³

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

⁴ www.lowincomesolar.org

- **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. Jobs 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 on Adjustable Block Program Request for Feedback Annual Report Job Training and Solar Workforce Diversity Reporting

Introduction

The Illinois Solar For All Working Group (“Working Group”) appreciates the opportunity to provide comments on the Illinois Power Agency’s (“IPA” or “Agency”) reporting of job training and workforce diversity information from Approved Vendors (“AV”) in the Long-Term Renewable Resources Procurement Plan (“LTRRPP”) Annual Report. The Agency has demonstrated a thoughtful approach to its proposed reporting templates with regard to the Adjustable Block Program (“ABP”), with a clear aim of ensuring that a complete picture of AV job training and solar workforce diversity is captured. Made possible by the Future Energy Jobs Act (“FEJA”), the ABP launched just last year and is still in its initial stages of operation. Given the recently established nature of the program, the Working Group recognizes that AV reporting criteria will necessarily involve continuous review processes and revisions based on different future scenarios to fully capture the clean and equitable energy goals set forth under FEJA. Accordingly, we submit the following comments which highlight areas that we believe can be expanded upon, and respond to the Agency’s request for feedback. As always, the Working Group’s focus is on setting and implementing the right framework for ensuring the state’s renewable energy efforts effectively engage and benefit low-income and environmental justice communities.

Areas of Requested Feedback

Understanding the diversity of the ABP workforce is a critically important goal, and to do that, we will have to drill down below the AV level, to contractors and sub-contractors. For this reason, the Working Group strongly supports the requirement of reporting for AVs and their contractors. At the same time, we recognize that the layered contracting relationships within the solar industry make data collection and reporting more complex. In our discussion of this proposal, questions were raised including:

- *How many layers down into contractors do the reporting requirements go?* The Working Group is interested in getting a 360-degree view of ABP project diversity, regardless of how many subcontractors that would involve (albeit still specifically limited to IL/ABP-specific work). We recognize the complexity of this endeavor, particularly in the case of an installer that works with multiple approved vendors (although allowing reporting at the subcontractor or AV designee level may help with this). In the event a

360-degree view is not possible in year one, we urge the Program Administrator to consider how such a view could be provided in future years.

- *For AVs that are aggregators, is the reporting best done on the AV or AV designee level?* The Working Group generally believes the reporting would be more useful one level below the aggregator, in addition to employees of the aggregator, reported separately, but does not believe the ABP is currently set up to accommodate this. We recommend the Program Administrator revisit this idea after further formalizing its approach to AV designees.

- *How should reporting work for year one, to accommodate the complexity of some AV relationships without compromising on data collection?* This is a difficult question and there may be no perfect answer. The Working Group would like to stress the importance of collecting this data now to establish reasonable baseline data. We are a year into program implementation and have no sense of the diversity of the workforce, despite diversity being a clear goal of the Future Energy Jobs Act, passed nearly four years ago. That is unacceptable. At the same time, it is particularly important for the baseline data used to provide a good picture of the industry and avoid data quality problems that are more likely to arise in more complex business structures, when collecting data retroactively, and on a short timeline.

Taken together, the Working Group recommends revisiting this reporting, considering the contracting relationships, after the first round of data collection and after more formalization of the AV designees, as discussed in Section 6.9.1 of the revised plan. To enhance this, the Program Administrator could ask for narrative feedback around the process of gathering and reporting data from AVs this first year, as well as the data itself, with an eye to issues on contracting relationships and what exactly went into the baseline data reported.

The Working Group supports the data collection recommendations that have been outlined in the provided sample templates, but believes that additional workforce categories are necessary in giving a more complete picture for AV reporting of the solar workforce in Illinois. The following additional categories are recommended to be added to the Job Training and Workforce Diversity templates in the Annual Reports:

- Retention (full time hire versus subcontractor and length of employment with a flag for COVID layoffs)
- Managerial/executive responsibilities
- Incoming pay and current pay or wage schedule
 - % of payroll by dollar amount
 - % of payroll by employee count

- Zip Code
- Certifications and/or degrees
- Age categories
- Employees with a record and foster care alumni

In addition, we recommend revisiting the racial categories provided to ensure those categories align with common data collection and reporting procedures (e.g. consider the inclusion of an option for folks with two or more races).

The Working Group recognizes the difficulties in collecting complete data, particularly in the first year. It is obviously unreasonable to expect complete reporting on this subject by July 15th when today is July 2nd and the data categories for reporting have not been finalized. The Working Group urges the IPA and the Program Administrator to make every effort to collect this data in year one, across all recommended data categories, however to do so on a reasonable timeline that gives the AVs a chance to collect accurate and thorough data - this may require a slightly different approach in year one than in future years. Finally, we recognize that there may be legal issues with what employers can share as well as challenges with the sometimes layered contractual relationships between the various companies participating in the delivery of solar through the ABP. Thus, we urge the Agency to think creatively about legally appropriate and minimally burdensome ways to access such data.

Conclusion

The Working Group appreciates this opportunity to provide comments on the AV Annual Reports reporting and looks forward to continued work alongside the IPA and its Program Administrator to enhance and improve the Illinois Adjustable Block Program and outcomes for low-income and environmental justice community members.