



310 West Main Street, Lena, Illinois 61048
Office: 815-580-3011 | Fax: 815-809-3011
StatelineSolar.net

**Illinois Adjustable Block Program
Request for Stakeholder Feedback**

November 3, 2021

Dear Representative of the Illinois Power Agency,

Thank you for allowing Stateline Solar, and all other stakeholders, the opportunity to provide feedback and comments regarding the proposed processes and restructure of the Adjustable Block Program.

Please see the following pages for our comments and questions regarding each section of the proposed processes. If you desire additional feedback or questions from Stateline Solar, please do not hesitate to reach out to Stateline Solar or myself.

Thank you,

Hilary Fiene



Hilary Fiene
Chief Office Manager



Stateline Solar: Response to Prevailing Wage Feedback Request

A. Documentation

1. Stateline Solar is against the proposed use of prevailing wage. It complicates our process as a non-union business. But if we have to, CTP would be reasonable. Again, this will completely complicate all businesses that operate outside of union standards, paying non-prevailing wage rates. It will cause a revamping of payroll systems and added complications to tracking of hours for prevailing wage specified jobs by the IPA and ABP versus non-prevailing wage specified jobs.

B. Verification

1. By doing this, it would result in relying on the honor system; the Program Administrator ***will not*** be able to prove this, which is why Stateline Solar is against prevailing wage. It will create an unequal playing field when competing for bids; shifty companies will not comply. Companies like that will not comply with the guidelines (intentionally) and will just wait to get slapped on the wrist down the road.
2. The idea of benchmark hours is taking all productivity and work ethic out of honest work. If ABP were to specifically give a number of hours expected per system size categories, it will create unreasonable low expectations assuming time per system and lead to lack of productivity. Not every 10 kW system is the same, so to put a specific number of hours to said system size is completely unreasonable.
3. This is not possible. Again, this is why Stateline Solar is against prevailing wage because it would be an honor system. All of this will create so much paperwork and added busy work that small business contractors will not be able to work efficiently with these added forms and differentiating between prevailing wage and non-prevailing wage categorized jobs.
4. Please, just don't do it. Too much of this proposed guideline is based on believing whatever each given solar company passes along with no concrete tracking or verification. We unfortunately have encountered several in-state and out-of-state companies that we know will not comply with these suggested guidelines and it will drowned out the companies complying due to uneven bidding processes and added complications to payroll.

Stateline Solar Prevailing Wage Questions to IPA:

1. How would paying both prevailing wage and non-prevailing wage rates to our employees impact our current benefits offered? As an independent solar company with less than 20 employees, we already offered our employees a SIMPLE IRA retirement plan, health insurance, paid time off, furthering education, and other benefits. With having to change our payroll system to incorporate prevailing wage, will we have to convert to fringe benefits; adding pension and 401k? If so, how do you expect small, family operated businesses to survive with these added expectations that take away from overhead cost?
2. Would we have to pay union fees? This is not what we want to do and blurs the line of non-union and union businesses, which we operate as non-union. Again, we are small operation, rural solar company in a town of 3,000 people; we are *NOT* a large-scale company operating in Chicago. This needs to be kept in mind with all of these new proposed program guidelines.
3. How do we classify our installers by the prevailing wage trade title categories? Our installers are turn-key, providing the entire installation process from start to finish. We need clarification on expected trade titles. Ideally there would be one set trade title so we do not have to differentiate on when our installers are laying racking, connecting panels, wiring inverter, and so forth separately for each part of the installation process.

Stateline Solar: Response to Proposed Residential & House of Worship Classifications Feedback Request

1. No, this does not adequately accommodate residential, farms, and multifamily buildings. Residential bills should be enough standard. You won't be able to prove 75% or any percentage for that matter.

2. This will rely on the honor system and will complicate the entire process. Solar companies and IPA would have to verify this information through the customer's accountant or tax preparer. How will you expect to prove this? Solar sales representatives cannot verify this. Customers will have a harder time verifying which class they are in, and causes so many extra hoops to jump through for the entire process. Like noted before, our solar competitors in-state and out-of-state WILL NOT follow these guidelines causing unethical sales and absolute mayhem for the solar companies, customers, and IPA.

3. Tax status, honor system? Complicates it for system owners.

Stateline Solar: Response to Equity Eligible Contractors Feedback Request

A. Registration process

2. It would rely on the honor system if the applicant simply submitted an affidavit. This would require further research on IPA's end to verify the information is truthful, which then results in more work and headache.

3. This seems inappropriate to collect; let alone criteria to make a person eligible for this program.

B. Duration of Certification

2. No, Stateline Solar does not believe this should be allowed. This seems inappropriate.

C. EEC Marketing

1. If the purpose of the EEC is to remove discrimination and disadvantages to those who previously have had this in their solar careers, wouldn't giving them a specific, distinct badge only further the separation and differences of that given business from all other solar companies? In our eyes, it defeats the purpose.

Stateline Solar: Response to Demographic & Geographic Data Collection Feedback Request

A. Data Collection

1. No comment for addition. This all seems overly invasive and feels like an overstep of information.
3. All of these questions are invasive and unnecessary.
4. Project-by-project would be overkill for a business that operates with less than 10-people on every single job performed by our business. This would be better suited for an annual basis submission if done at all.
5. No, again this is overkill and unnecessary information to collect from subcontractors.
6. **Absolutely not.** Stateline Solar cannot stress this enough. The request of this information is inappropriate and is not a contractor's responsibility to collect, and would be an overstep by IPA to contact customers for information after system install. This SHOULD NOT be done to respect the privacy of the system owner.

B. Reporting & Accuracy of Data

1. To be eligible to the entire Adjustable Block Program as a state of Illinois program, the Approved Vendor should be required to be an established local Illinois company with a main branch and sub branches in the state of Illinois. Illinois funds are going out of state to out-of-state solar companies and this needs to be addressed. The ABP stimulates the Illinois economy, but that is not the case when out-of-state companies are reaping the benefits of the program and the funds are leaving Illinois.
2. Determine the location of the solar companies headquarters and majority of branches; verify these are in Illinois. Determine how to keep any funds distributed through ABP in the state of Illinois.

Stateline Solar: Overall Feedback Regarding Proposed Processes

1. The Illinois Power Agency and Adjustable Block Program needs to keep in mind rural versus city system pricing and price per watt comparison based on region of Illinois. This IS NOT the same state wide. Rural businesses will suffer from some of these proposed items. This will result in increasing system prices and decreasing business margins to keep competitive bids and customer pricing down. Stateline Solar is elated that the ABP is coming back, but a lot of the proposed processes will hurt small businesses and will force solar companies to close, competition to halt, and a monopoly on the solar industry in Illinois.
2. As a rural solar company, this proposed plan seems catered to city, large solar companies. This will immediately impact our businesses future and hurt our customer base.
3. New proposed plan does not have the customers best interest at mind after all the hoops they would have to jump through and invasively suggested records and reports required by the customer to submit to be applicable to the program.
4. As much as Stateline Solar would hope all of our competitors would abide by these newly established ABP guidelines, we know they won't follow all of the rules, which will result in truthful companies losing customer bids. As noted repeatedly throughout our feedback, the honor system is the only option for some of the proposed processes. The IPA and ABP past guidelines have been notably ignored in the past by our competitors and it seemed no actions were taken to correct this. How does ABP plan to make sure everyone is compliant for a level "playing field" for all solar companies?