

**To:** Illinois Power Agency  
**From:** MeLena Hessel & Participants in the Illinois Solar for All Working Group  
**Date:** 08/28/2019  
**Re:** Illinois Solar for All Working Group Comments on Low-Income Community Solar Pilot Project Preliminary Proposal Requirements

---

Dear Illinois Power Agency & Procurement Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on in response to the Illinois Power Agency's and its procurement administrator's Request for Comments on the Low-Income Community Solar Pilot Project Preliminary Proposal Requirements. 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:

Central Road Energy, LLC

Environmental Law and Policy Center

ONE Northside

Natural Resources Defense Council

Prairie Rivers Network

Seven Generations Ahead

Union of Concerned Scientists

## Working Group Process

The Working Group began convening in January 2017, and has had monthly full-group meetings until the present time. In tandem, the Working Group operates with sub-teams that focus on specific areas relevant to the policies at hand and future work on the program. These sub-teams include: Program Administration & Evaluation, Consumer Protection & Financing, Education & Engagement, Job Training, and Project Workshop. Each sub-team was facilitated by leads and co-leads and meets between monthly full-group meetings with frequency depending on the time of year.

## 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.<sup>1</sup>
- A final White Paper was published on July 11, 2017 on [lowincomesolar.org](http://lowincomesolar.org).<sup>2</sup>
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.<sup>3</sup>
- 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 enclosed responses to IPA's July 3, 2019 Request for Comments on the Long-Term Plan Update.

## 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*<sup>4</sup> 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:

---

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

<sup>2</sup>

[http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper\\_Final\\_wAppendices.pdf](http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper_Final_wAppendices.pdf)

<sup>3</sup>

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

<sup>4</sup> [www.lowincomesolar.org](http://www.lowincomesolar.org)

- **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.
- **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 Low-Income Community Solar Pilot Project Preliminary Proposal Requirements

## Introduction

The Illinois Solar for All Working Group feels strongly that the approach to the Low-Income Community Solar Pilot sub-program - evaluating projects based on cost alone once they meet community benefit eligibility criteria - is flawed. This Working Group and our members argued strongly for criteria other than price to be considered in the evaluation of bids during the approval process for the Long-Term Renewable Resources Procurement Plan. While the pilot sub-program was ultimately approved as proposed, we continue to believe an approach that considers non-price criteria in order to maximize benefits to low-income and environmental justice communities would be far superior.

However, in order for an approach to the pilot program predicated on “setting a high standard for eligibility to bid, then using a price-based evaluation approach” (Illinois Power Agency Response to Objections at 98, Docket 17-0838) to work, eligibility standards must be suitably high. The Working Group is concerned that the community involvement eligibility criteria, as presented are not suitably high and, in fact, are inadequate to ensure adequate community benefit. Proposal criteria are listed below along with comments and suggestions from Working Group members.

## Community Involvement Criteria from [Preliminary Proposal Requirements](#) (page 12):

*Criteria 1:* Defining the Community. The “community” is defined as the area around the Project. It is the area within a 10-mile radius for an urban county<sup>1</sup> and within a 30-mile radius for a rural county.

- Organizations within the community are “community-based”.
- Subscribers (as this term is defined in the key contract terms below) are “qualified” if they reside within the community.
- The Bidder may propose an alternative definition of the community associated with the Project. The Bidder must provide:
  - The name of the community;
  - A map showing the relevant geographic boundaries; and
  - Evidence that the community’s residents associate themselves with the community.

---

<sup>1</sup> An urban county is a county that is in a Metropolitan Statistical Area or a HUD Metro FMR Area. A rural county is any other county in the state.

### ***Solar for All Working Group Comments and Suggestions on Criteria 1:***

The Solar for All Working Group is concerned that defining an organization as being community-based due solely to its physical location within the community is not an adequately thorough evaluation of whether said organization is community-based. Instead, the Working Group recommends the IPA and NERA look back to the definition of community-based organization approved in the long-term Plan, which pulls from the definition of the National Community-Based Organization Network:

- *The majority of the governing body and staff consists of local residents,*
- *The main operating offices are in the community,*
- *Priority issue areas are identified and defined by residents,*
- *Solutions to address priority issues are developed with residents, and*
- *Program design, implementation, and evaluation components have residents intimately involved, in leadership positions. (Plan at 168)*

Therefore, in order to fully evaluate whether the partnering organization is actually community-based, the Working Group recommends the IPA/NERA also collect information about the residency of organization governing body members and staff, as well as resident involvement in organization priorities, planning, and program implementation. The latter information can be collected in the letter from the organization discussed below.

The Working Group is concerned that the 10- and 30- mile radius proposed is arbitrary and will not sync with actual community boundaries for the purposes of this RFP. We recommend that bidders and community-based organizations (CBOs) define their own community boundaries, perhaps with the expectation that communities not expand beyond certain distances for urban and rural areas. To identify whether a project is truly community based, specificity is needed. Specifically, bidders need to delineate the community boundaries of their collaborating CBO as well as their proposed project. Geographic boundaries should include actual streets that their collaborating CBO serves as well as the location of their office(s) To further delineate whether a CBO is community based, it is important to include specific language regarding their work in the community in question such as efforts involving pollution remediation, housing, public education etc. If the CBO is located in the community but their outreach and projects are not located within the identified community, the bidder should explain the rationale. The explanation should succinctly define why the majority of their actual work is outside of the community.

In the City of Chicago and other urban areas, it is worth noting that many EJ and low income neighborhoods are at the most 1 ½ to 2 miles wide. In fact, some including Little Village are even smaller. We thus recommend that bidders identify the actual neighborhood that they are focusing on as defined among other variables by the geographic boundaries that their collaborating CBO is in. If the CBO serves many I

neighborhoods,, they need to explain in one paragraph how serving multiple neighborhoods in the 10 mile and/or 20 mile radius will enhance the activities/work of the primary neighborhood(s) in which the CBO works and is located in. If proposed work is in a rural area, we recommend the bidder similarly identify discrete neighborhoods/ sub-areas within any larger community, specific goals for discrete areas, and explain how this will enhance the activities/work of the primary area(s) in which the CBO works.

**Criteria 2:** Demonstrate partnership with one or more community-based organization. The Bidder must provide for each community-based organization:

- Name of the organization;
- Address of the organization (must be in the community defined above);
- Programs and services offered by the organization; and
- A letter from the organization, with contact information for at least one leader of the organization, describing the partnership with the Bidder with regards to the Project.

***Solar for All Working Group Comments and Suggestions on Criteria 2:***

The Working Group believes that the narrative letter from the community-based organization should be used to establish both the organization's status as community-based, as well as the fact that the partnership between the organization and the project bidder is substantial (to quote the approved Plan "...the intent of the Act was to create substantial partnerships, going beyond just holding a few community meetings," (Plan at 168)). The Working Group believes clear prompts to which the organization can respond may help organizations that are not independently familiar with the Solar for All program, better understand the goals of the program and therefore better provide the information sought. For instance, prompts should include:

- The Solar for All Low-Income Community Solar Pilot requires community solar developers to partner with community-based organizations. For the purpose of Pilot community-based organizations are ones for which:
  - Priority issue areas are identified and defined by community residents,
  - Solutions to address priority issues are developed with community residents, and
  - Program design, implementation, and evaluation components have community residents intimately involved, in leadership positions.

Please discuss community residents' involvement in your organization's identification of priorities, development of plans to address those priorities, and implementation of those plans.

- The Solar for All Low-Income Community Solar Pilot requires partnerships with community-based organizations to be substantial. Please describe your partnership with the project bidder and explain how that partnership is substantial and how it is responsive to the priorities and concerns of low-income community members<sup>2</sup>.

---

<sup>2</sup> This language echoes requirements for low-income community solar projects approved on page 168 of the Long-Term Renewable Resources Procurement Plan.

To add further clarity on actual community involvement, the identified community based organization(s) should include in their letter succinct documentation of experience/evidence of effectively working in their low community. Specifically the community-based organization(s) should identify areas of demonstrated success in their community with a “yes” or “no”. With answers, provide a short paragraph documenting the achievements/outcomes including dates as it relates to any or all of the following:

- **Low income housing** Y N

If yes, name other organization(s) located in their community that they collaborated with on this issue \_\_\_\_\_  
Date of the commencement of work \_\_\_\_\_  
Date when work ended \_\_\_\_\_  
Work is on-going \_\_\_\_\_ Y N  
Name of Executive Director \_\_\_\_\_  
Location of office in the community \_\_\_\_\_

- **Enrollment in public benefit programs** Y N

If yes, name other organization(s) located in their community that they collaborated with on this issue \_\_\_\_\_  
Date of the commencement of work \_\_\_\_\_  
Date when work ended \_\_\_\_\_  
Work is on-going \_\_\_\_\_ Y N  
Name of Executive Director \_\_\_\_\_  
Location of office in the community \_\_\_\_\_

- **Active in local public schools** Y N

If yes, name other organization(s) located in their community that they collaborated with on this issue \_\_\_\_\_  
Date of the commencement of work \_\_\_\_\_  
Date when work ended \_\_\_\_\_  
Work is on-going \_\_\_\_\_ Y N  
Name of Executive Director \_\_\_\_\_  
Location of office in the community \_\_\_\_\_

- **Campaign addressing and advocating for redress on local environmental issues** Y N

If yes, name other organization(s) located in their community that they collaborated with on this issue \_\_\_\_\_  
Date of the commencement of work \_\_\_\_\_  
Date when work ended \_\_\_\_\_  
Work is on-going \_\_\_\_\_ Y N  
Name of Executive Director \_\_\_\_\_

Location of office in the community

- **Violence prevention efforts** Y N

If yes, name other organization(s) located in their community that they collaborated with on this issue \_\_\_\_\_

Date of the commencement of work \_\_\_\_\_

Date when work ended \_\_\_\_\_

Work is on-going \_\_\_\_\_ Y N

Name of Executive Director

Location of office in the community

To further provide substance on how collaborating organization is community-based, information on the Board is needed. The Working Group recommends more detailed information on the composition of the board or governing body including their involvement in the community such as:

Name of Board member \_\_\_\_\_

Officer of the Board

Does member reside in the community \_\_\_\_\_ Y N

If Y residency location \_\_\_\_\_ -

Active in the community \_\_\_\_\_ Y N\_\_

Active in what issue included but not limited to:

- housing,
- anti-violence work,
- public schools ,
- environmental remediation or
- Awareness and enrollment in public benefit (such as SNAP, Medicaid etc)

**Criteria 3:** Recruitment of subscribers and ownership of each Project by subscribers. The Bidder must indicate whether the Project is at least 50% owned by subscribers. The percentage ownership is defined as the percentage of the Project capacity owned by a subscriber.

- If yes, the Bidder must provide the list of subscribers with Project ownership, documents to substantiate ownership of the Project by the subscribers, income-verification for each subscriber, as well as address (which must be within the community).
- If no, the Bidder must describe outreach efforts undertaken to date to recruit subscribers.

**Solar for All Working Group Comments and Suggestions on Criteria 3:**

The definition of subscriber should be broadened beyond just small residential subscribers. Instead, bidders should be required to define their target subscribers and the resulting economic benefits for community members. This is better in keeping with the Future Energy Jobs Act, which specified "Pilot projects must result in economic benefits for the members of the

community in which the project will be located” but nowhere specifies that a Pilot Project must serve only small residential subscribers (and in fact specifically allows for an anchor tenant to subscribe to to 40% of a project).

The Solar for All Working Group further recommends that projects that utilize an ownership structure that results in community ownership within a specified, near-term time period - perhaps 6 years - be considered community-owned.

We also recommend that bidders be required to list demographic information regarding targeted subscription efforts with their partnering community based organization.

**Criteria 4:** Workforce development. The Bidder must:

- Provide a hiring plan that is expected to result in engaging job trainees or workers residing within the community;
- A summary of efforts to date to engage job trainees or workers residing within the community; and
- Any MBE/WBE commitments.

***Solar for All Working Group Comments and Suggestions on Criteria 4:***

The Working Group recommends the IPA/NERA reword the first bullet point to state: “Provide a non-discriminatory hiring plan...” and add the following additional bullets:

- List any accredited third party training organization recruiting partnerships.
- Include any worker retention history.
- Provide information on competitive wage and benefit packages.
- Provide information on employee assistance support services, either within the company or in partnership with outside organizations (ie. transportation, mentoring, stipends for tools or PPE).

In addition to MBE/WBE commitments, a community solar project is an ideal transitional work environment for contractors hiring returning citizens. The IPA/NERA should ask all bidders whether they have engaged or plan to engage with the following DOL programs:

- There is a [federal bonding program](#) available for employers. This provides bonding for returning citizens.
- There is a [federal tax credit](#) for employers for hiring individuals from certain target groups who have consistently faced significant barriers to employment.