

To: Elevate Energy, Program Administrator, Illinois Solar for All Program
From: Juliana Pino, Little Village Environmental Justice Organization
& Participants in the Illinois Solar for All Working Group
Date: 01/09/2019
Re: Illinois Solar for All Working Group Comments on Grassroots Education for Illinois Solar for All

Dear Elevate Energy Administrative Team for the Illinois Solar for All Program:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the Grassroots Education for the Illinois Solar for All Program. 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. Over 75 participants include representatives from the following organizations and others:

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| BIG: Blacks in Green | Little Village Environmental Justice Organization |
| Central Road Energy LLC | Natural Resources Defense Council |
| Environmental Law & Policy Center | One Northside |
| Illinois People's Action | Sierra Club Illinois |

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.

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 submitted comments on Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClima on December 10, 2018.

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.
- **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

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

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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

renewable energy and energy efficiency programs, and supports piloting of financing tools such as pay-as-you-save, on-bill financing, PACE or community-led group buy programs. Jobs training program 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. 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.

Dear Elevate Energy Administrative Team for the Illinois Solar for All Program:

The Illinois Solar for All Working Group appreciates this opportunity to provide comments on the Grassroots Education components of the Illinois Solar for All program proposed in presentations and stakeholder sessions hosted by Elevate Energy (hereinafter the “Administrator”). It is clear that the program administration team has put significant thought into the role of Grassroots Education in the Illinois Solar for All Program. These comments are intended to provide guidance and feedback on how the Illinois Solar for All Working Group (hereinafter “Working Group”) views the key considerations, best practices, and outstanding questions for administration of the Grassroots Education components of Illinois Solar for All. The Working Group commends the Administrator for their consideration of key provisions critical to the success of Grassroots Education delivery and the Illinois Solar for All program overall.

Stakeholder Groups

The Working Group supports the Administrator in providing a list of possible stakeholder audience groups for Grassroots Education. The Working Group recommends that the Administrator not limit the list such that campaigns for Grassroots Education targeted toward additional groups could be submitted and considered for funding so long as the proposals advance the goals, statutory language, and program details outlined in the Long-Term Renewable Resources Procurement Plan (LTRRPP) behind the Illinois Solar for All program.

Churches and Faith Organizations Stakeholder

In addition to the groups of stakeholders proposed by the Administrator, the Working Group believes that the category of “Churches” and/or “Faith Organizations” should be identified as an additional stakeholder group for the purposes of the program. Said groups may also function as community organizations, but it is important to signal to groups seeking to conduct Grassroots Education that such stakeholders could qualify as potential audiences for campaigns.

Potential Grassroots Education Topics

The Working Group supports the Administrator in providing a list of possible topics for Grassroots Education. The Working Group recommends that the Administrator not limit the list such that campaigns for Grassroots Education on creative topics could be submitted and considered for funding so long as the proposals advance the goals, statutory language, and program details outlined in the LTRRPP behind the Illinois Solar for All program.

Stakeholder Engagement Topic

In addition to the potential Grassroots Education topics proposed by the Administrator, the Working Group recommends an additional potential topic regarding “Stakeholder Engagement.” Such a topic would allow Grassroots Education providers to share opportunities for stakeholder audiences to be engaged in ongoing stakeholder processes regarding Illinois Solar for All as run by the Administrator. In accordance with the Administrator’s proposal, such a topic would *not* permit Grassroots Education

providers to advocate that stakeholder audiences engage in policy or program changes nor suggest what policy or program changes such stakeholder audiences could or should broach upon subsequent engagement in ongoing stakeholder processes regarding the program.

Provision of Baseline Materials on Key Program Topics

The Working Group was unable to ascertain with clarity whether or not training or an example set of materials would be furnished by the Administrator to Grassroots Education providers. Consequently, the Working Group recommends provision of materials, such as but not limited to, a sample set of materials, along with a corresponding training or webinar, be furnished by the Administrator to Grassroots Education providers on a subset of the proposed topics. The Working Group also recommends flexibility in the provision of materials such that the Administrator could work alongside Grassroots Education providers to develop resources on request. This would be most critical where ensuring consistency in messaging or information delivered is key, such as topics that pertain to specifics about the program and its component parts or processes versus more general education.

Provision of Contact at the Administrator

Additionally, the Working Group recommends that Grassroots Education providers are furnished with a clear point of contact in the Administrator team for support, question answering, and review of prepared materials on topics for funded campaigns.

Relationship Between Grassroots Education and Outreach, Approved Vendors

Delineation Between Grassroots Education and Outreach Activities

The Working Group is in agreement with the Administrator that there exists a clear delineation between:

- a) Grassroots Education providers funded through the statutorily authorized program that would be running campaigns to educate stakeholder audiences and
- b) separate outreach activities conducted by organizations contracted by Approved Vendors to specifically reach intended recipients for participation in potential projects as customers or subscribers.

Recognizing this delineation, the Working Group also acknowledges that there may be situations where a Grassroots Education provider under the Illinois Solar for All program may enter into subsequent, separate agreements for outreach work with and for Approved Vendors, as noted above.

Provision of Guidelines for Permissible Activities and Interactions

The Working Group recommends that the Administrator develop clear, simple guidelines for permissible activities and interactions with Approved Vendors during the course of their campaigns. The Working Group recommends that these guidelines be furnished to Grassroots Education providers prior to contract execution on such that providers do not unwittingly cross over from education into outreach activities. The Working Group recommends that these guidelines be paired with contract language clearly defining and stating the obligation of Grassroots Education providers to not engage in outreach activities in the course of completing work under this program. Furthermore, the Working Group believes that the Administrator should not take a punitive approach to regulating these relationships. The Working Group believes that such organizations should be allowed to engage in both kinds of contracts, providing that the

work activities under each are 1) funded separately, 2) conducted in a manner that there is a clear distinction between education campaigns and outreach activities, including hosting education and outreach at different times and/or locations. See above comment

Provision of a Bridging Function to Advance Grassroots Education Efforts

The Working Group also recommends that the Administrator should create a bridging function such that recipients of Grassroots Education funding have access to:

1. an easily available mechanism to connect to Approved Vendors in the program within the guidelines laid out by the Administrator and
2. information on the scope and location of Approved Vendors operating in their geographic area.

Provision of a Point of Contact for Follow-Up

Finally, the Working Group recommends that the Administrator furnish a point of contact and specific procedure for follow-up that Grassroots Education providers could supply to stakeholder audience members who may be interested in signing up for various programs or projects as a result of receiving education. As Grassroots Education providers cannot engage in that follow-up through this program where it constitutes separate outreach activities, this would provide a critical vehicle for these stakeholder audiences to understand and pursue access to programs and projects directly via the Administrator.

Qualification for Grassroots Education Organizations

Defining Grassroots Education Organizations

The Administrator put forward the following two alternatives for how to define Grassroots Education organizations as qualified providers for the purposes of this program:

(1) Whether Grassroots Education organization should qualify based on the definition of "community based organization" in section 8.6.2 of the Final Plan (where 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) OR qualify based on the definition of nonprofit/public sector critical service providers as defined in nonprofit/public sector sub-program of the IL Solar for All program where (1) non-on-profit or public agencies are located within qualifying low-income or environmental justice communities and (2) offer essential services, including those that support a basic standard of living (e.g. food, shelter, safety); provides educational and social development opportunities; offers medical care and prevention services; or deploys social, emergency or municipal services.

The Working Group recommends that qualification for the program should prioritize or be limited to organizations that meet the definition of “community based organization” in section 8.6.2 of the final LTRRPP as identified above.

Prioritization of Stakeholders

Additionally, the Working Group generally believes that the groups provided by the Administrator as possible stakeholder audiences are the appropriate stakeholders in this program. However, to the extent that priority is given to ensuring different stakeholders are engaged, community organizations, low-income households, and environmental justice communities should be given higher priority. The Working Group believes such groups are most directly in relationship with the broader target audience for the Illinois Solar for All program and would be most well-positioned to educate on the program or access program benefits. Organizations that:

1. are nonprofits or public agencies, and that
2. are not directly accountable to and/or governed by low-income and environmental justice community members per the definition of “community based organization” stated in section 8.6.2

should only be permitted to receive funds if they are organizations who primarily or entirely⁵ serve clients comprised of households that are low-income and/or in environmental justice communities.

Provision of Subcontracting for Grassroots Education

However, the Working Group also recognizes the challenges facing communities in geographic areas where such groups do not exist or are limited in their ability to participate in the program for unforeseen factors. Thus, the Working Group recommends that the Administrator allow community based organizations to subcontract with separate nonprofits or public agencies located in targeted communities.

Format and Scope of Subcontracting

The Working Group recommends that subcontracting be permitted to occur in a number of implementation formats including, but not limited to, allowing for contracted community based organization staff co-located to separate nonprofits and/or public agencies. Specifically, such arrangements could include staffing located “on site” in a community —where contracted providers are physically located in the subcontracted separate nonprofit community based organization and/or public agency’s offices in the targeted community. The Working Group believes allowing for such an arrangement would enable these providers to work effectively within the targeted community with the goal of integration into said community, as well as integration into the nonprofit and/or public agency where they are situated. In this format or other similar structures, the reporting to and authority over decisions regarding the Grassroots Education provision resides with the contracted community based organization.

The scope of the subcontracting could also include funding for joint work at the subcontracted nonprofit organization and/ or public agency, as deemed appropriate by the contracted community based organization to carry out campaigns and manage metrics, reporting, and other key aspects of providing Grassroots Education. The Working Group recommends that proposed partnerships that are not based on this model of contracted community based organizations subcontracting with separate nonprofit community based organizations and/or public agencies be analyzed for funding on a case-by-case basis. Such an analysis should including the submitting organization’s rationale on why a subcontracting

⁵The Working Group recommends a 90% of clients served comprised of households that are low-income and/or in environmental justice communities baseline threshold to meet “primarily or entirely.”

relationship is not proposed and preferred, as well as specificity on reporting relationships and other aspects of authority regarding provision of Grassroots Education.

Application Process and Qualifications

Periodic Application Windows

The Working Group supports the Administrator in the proposal to provide periodic application windows, versus once per year or continuously. The Working Group believes that this strikes the appropriate balance between matching Grassroots Education opportunities with capacity of groups to submit campaign proposals and the program implementation timeline. The Working Group recommends that the Administrator more clearly define “periodic” in advance of opening the opportunities such that potential providers can anticipate and properly plan for proposal submission. The Working Group believes this would increase the accessibility of the process to smaller groups. Example windows could include quarterly, three times per program year, or other kinds of like specificity.

Transparent Selection and Qualification Process

The Working Group supports the Administrator in the proposal to provide a transparent selection and qualification process. The Working Group believes this will lead to a stronger set of program outcomes, as well as greater understanding for potential Grassroots Education providers, as they seek to apply in future periodic application windows. The Working Group recommends that the Administrator state prior to the beginning of the first application window a) when in the process of selection and approval information about the process could be furnished by the Administrator and b) what information could be furnished to the subset of applying Grassroots Education organizations in any given periodic application window. Similarly, the Working Group recommends that the Administrator state prior to the beginning of the first application window a) when in the process of selection and approval information about the process could be furnished by the Administrator and b) what information could be furnished to the broader set of stakeholders with interest in the performance of the Illinois Solar for All program more generally. Such groups include: potential Grassroots Education providers looking to apply in future cycles, advocates, community members, and others. Some examples of types of information about the process that the Administrator could consider for transparency include: the specific organizations that submitted proposals and/or the types of organizations that submitted proposals, specific organizations that were funded, the geographic distribution of proposals, and the method of scoring campaign proposals and/or the method of scoring Grassroots Education providers and partners.

Campaigns and Metrics

Provision of Model Baseline Metrics; Supplementary, and Alternative Metrics

The Working Group supports the Administrator in specifying a set of sample metrics to measure campaign completion and success for Grassroots Education providers. The Working Group believes that the metrics listed by the Administrator as examples are reasonable in most campaign situations. Consequently, the Working Group recommends that a basic set of metrics for outcomes, deliverables, and success be put forward as model baseline metrics. However, the Working Group also recommends that Grassroots Education providers be allowed to submit supplementary or alternative metrics that are best

suited to the specific kinds of campaigns such providers are proposing. In particular, campaigns using creative delivery formats or addressing the needs of specific stakeholder audiences may require the use of supplementary and/or alternative metrics to the set provided by the Administrator to adequately capture the most accurate information on successful completion.

Environmental Justice Communities

Measurement and Effective Campaign Delivery

The Working Group also suggests that grassroots education activities intending to reach environmental justice communities could fit the need for alternative or supplementary metrics per the preceding recommendation, but that such needs would likely vary community-to-community due to the large diversity of needs amongst different environmental justice communities across the state.

Provision of Additional Engagement Opportunities in Program Design

The Working Group recommends that the Administrator raise questions about quantifiable measurement that campaigns will effectively serve environmental justice communities, possible differentiation around measurement of success for campaigns in these communities, as well as the degree of prescriptiveness around these measurements in its planned stakeholder session on Environmental Justice community identification on January 18, 2019 and in the subsequent comments solicited on that topic area. The Working Group believes this will maximize the opportunities for environmental justice communities and community based organizations serving these communities to fully exercise their capacity for input.

State Vendor Requirements

Permitting Applications from Fiscally Sponsored Groups

The Working Group recommends that the Administrator allow for groups that do not currently hold a nonprofit status to apply for participation as Grassroots Education providers that such groups do so through a fiscal sponsor. In this scenario, the 501(c)(3) status of the fiscal sponsor fulfills the ability and legal accountability to act as a subcontractor to the Administrator. This scenario would apply in situations where long-standing community based groups are very well positioned to provide Grassroots Education per the proposed guidelines of the program and where such groups currently operate under fiscal sponsorship to receive grant funds, donations, and other contracts.