



Illinois Solar For All

Project and Participant Eligibility and Verification Processes

Stakeholder Feedback Session

Comment due no later than March 8, 2019 at 5:00 PM

Send comments to comments@illinoissfa.com

February 25, 2019

Agenda

- Welcome/Introductions
- Low-Income Distributed Generation and Community Solar Eligibility
- Non-Profit/Public Facilities Eligibility
- Income Verification Process
- Income Verification Methods
- Other Eligibility Issues
- Next Steps





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Project and Participant Eligibility:

Low-Income Distributed Generation and Low-Income Community Solar



Project Eligibility:

Low-Income Distributed Generation

- Installed on-site on residential properties behind the meter
- Participant value through:
 - Individual net metering
 - Multiple tenant net metering (pursuant to 16-107.5(l)(1)(B) of the Public Utilities Act)
 - On common meter or master meter and passed on indirectly through reduced rents, stabilized rents or other measurable means.
- No upfront costs; ongoing costs and fees not to exceed 50% of first-year value from participant share of generated energy
- All other program requirements



Participant Eligibility: Low-Income Distributed Generation

- Single family homes: household must verify at 80% or less of AMI
- 2-4 unit buildings: at least two households must verify at 80% or less of AMI
- 5+ unit buildings: either at least 50% of tenants verify at 80% AMI or less
- Alternative methods of qualifying include any of the following:
 - HUD Project-Based Vouchers
 - HUD Project-Based Rental Assistance
 - Income Eligible Multifamily Energy Efficiency
 - HUD Fair Market Rent Documentation System





1. Are there other ways to ensure residents of master metered buildings are seeing savings?
2. For rental single family homes, what would be the appropriate requirements for a landlord to certify their commitment to keep the rental unit affordable and not to raise rents to market levels or sell the property after the solar project is installed?

Project Eligibility:

Low-Income Community Solar

- Roof or ground mounted, direct to the grid
- Participant value through bill credits
- Demonstrate community engagement by
 - Providing narrative summary of efforts taken prior to the application to conduct community outreach, education, and recruitment
 - Listing community-based organizations the applicant has partnered with, including letters from those organizations to verify the partnerships
- No upfront costs; ongoing costs and fees not to exceed 50% of first-year value from share of generated energy
- All other program requirements



Participant Eligibility: Low-Income Community Solar

- Only one anchor per project; no anchor has more than a 40% share
- A non-profit or public facility anchor receives the ILSFA REC price
- Any other anchor type receives the applicable ABP REC price
- 50% of capacity, excluding anchor, must be subscribed by low-income households
- Any subscribed capacity that is not associated with a low-income household or the anchor receives no REC payments for that share
- Anchor and 50% of low-income share must be subscribed at energization





3. Comments on the requirement that half the subscribers, outside of the anchor share, be low-income households
4. Comments on the requirement that anchors that are not non-profit or public agencies get the ABP REC price
5. Comments on the requirement that non-anchor subscribers that are not low-income households receive \$0 REC payments
6. Comments on allowing one anchor tenant



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Project and Participant Eligibility for Non- Profit/Public Facilities:



Project Eligibility: Nonprofit / Public Facilities

- Onsite roof or ground mounted, behind the meter
- Participant value through net metering
- No upfront costs; ongoing costs and fees not to exceed 50% of first-year value from share of generated energy
- All other program requirements
- A public facility with a public sector customer or a property occupied by a qualifying nonprofit organization
- A property within an Illinois environmental justice or low-income community



Participant Eligibility: Nonprofit / Public Facilities

- A Critical Service Provider for that community, or
- A public agency or non-profit organization having a sufficient connection to and input from the low-income or environmental justice community members served, by
 - Providing a narrative summary of efforts to conduct community outreach and education about the proposed entity being served by this installation, or
 - Demonstrating community-based organizations' support of the proposed entity being served by this installation



List of Qualified Critical Service Providers

- Advocacy organizations
- Affordable housing providers
- After-school care providers
- Childcare centers
- Community centers
- Community financial institutions (such as credit unions, non-profit lenders)
- Disability service providers
- Emergency service agencies (fire, police, Red Cross)
- Family support agencies
- Food pantries
- Homeless shelters
- Hospitals, health care facilities, and clinics
- Housing services providers
- Immigration services providers
- Job training and workforce development services
- Mental and behavioral health facilities
- Municipal administration offices
- Places of worship
- Rehabilitation providers
- Public schools
- Senior centers
- Senior centers
- Social service agencies (including unemployment and social security offices)
- Transitional or supportive housing (including for teens and LGBTQ)
- Women's or children's shelters
- Youth centers

Other Critical Service Provider types will be considered by the Program Administrator on a case by case basis.



Non-Profit/Public Facilities Verification

Location Eligibility

1. Approved Vendor will collect a completed Non-Profit/Public Facilities Basic Information Form
2. Will verify that the property is 1) occupied by a Non-Profit organization or 2) a public facility occupied by a public agency
3. Will verify whether the participant organization is in a qualified ILSFA EJ community using the [ILSFA online tool](#), or
4. Will verify whether the participant organization is in a qualified ILSFA low-income community using the [ILSFA online tool](#)



Non-Profit/Public Facilities Verification Organization Eligibility

5. Approved Vendor will verify the organization's eligibility by either:
 - a. Satisfying the definition of Critical Service Provider using the list of 25 qualified organization types, or
 - b. Sufficient connection to and input from the low-income or environmental justice community members the non-profit or public agency serves, by



Non-Profit/Public Facilities Verification Organization Eligibility

- i. Providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being served by this installation
 - Educating the community on how the participant organization serves this community, how the solar installation will allow benefits to pass to the community, and seeking support for their participation in ILSFA
- ii. Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of the proposed entity being served by this installation.





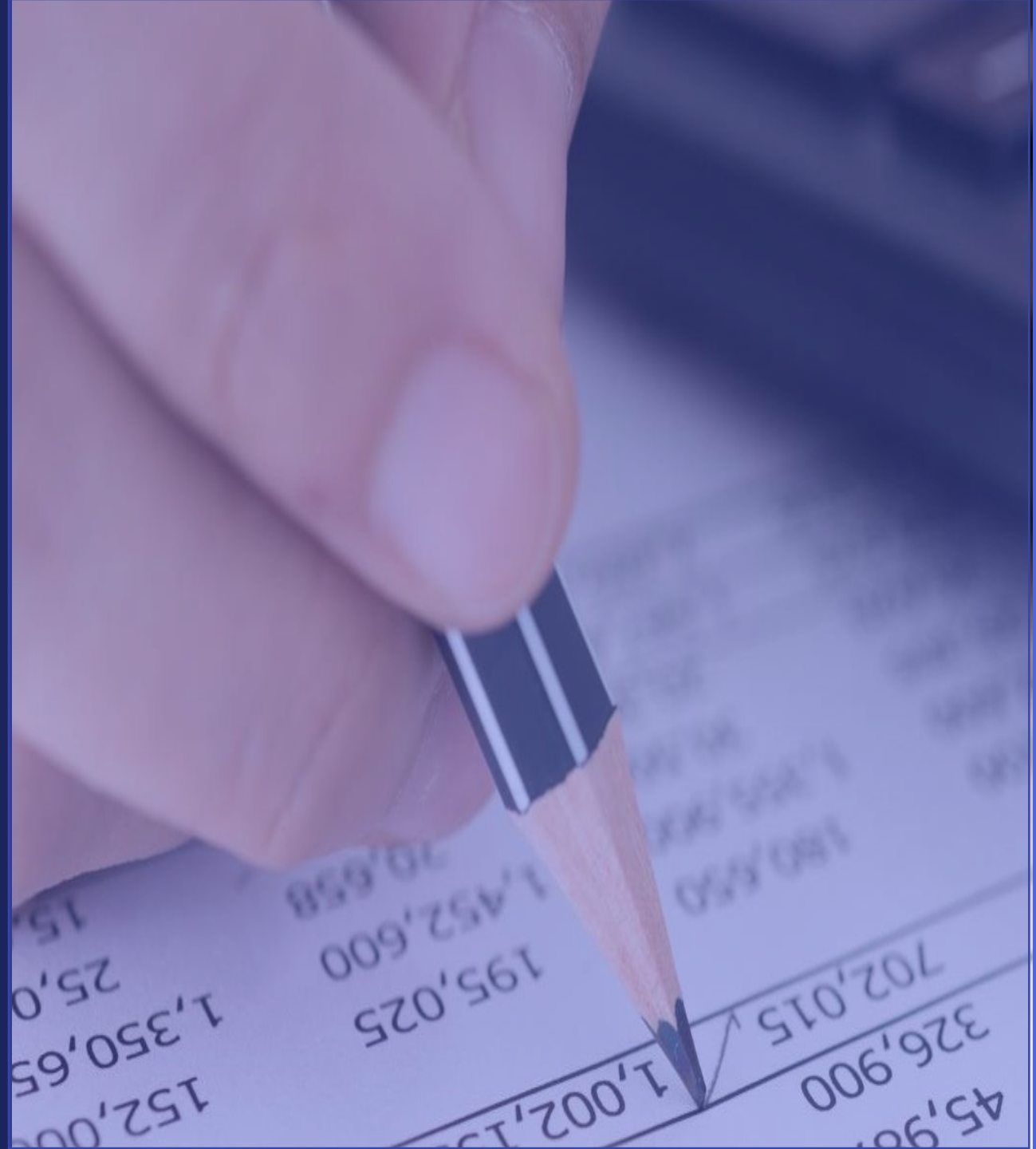
7. Comments on the requirement for non-profit/public sector customers taking service at public buildings to be sited within EJ and LI communities
8. Comments on the community engagement aspects of Non-Profit/Public Facilities eligibility.
9. Is handling requests for other types of critical service providers types appropriate to handle on a case by case basis?



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Income Verification Process

Low-Income Distributed Generation
and Low-Income Community Solar



Participant Data Collection

- Data for all program participants and household members must be collected by Approved Vendors and submitted as part of the Part I project approval submission
 - Property owners, tenants and community solar subscribers
 - Basic Information Forms completed by each
 - Property and contact details, eligibility verification methods
- Entered via Approved Vendor portal at [Illinoisfa.com](https://illinoisfa.com)
- Share of capacity for all subscribers is captured annually. Only new subscribers require full participant data and are income verified.



Defining Income

- Gross wages, salaries, commissions, sick pay, and tips
- Taxable interest
- Dividends
- Taxable refunds, credits, or offsets of state and local income taxes.
- Social Security (SSA) or Disability (SSI)
- Veterans (VA) benefits
- Alimony (or separate payments) received
- Business or self-employment income (or loss)
- Taxable amount of pension, IRA and annuity payments
- Lottery income
- Rental real estate, royalties, partnerships, and S Corporations or trusts.
- Farm income (or loss)



Income Types Included

- Income included in calculation
 - Temporarily absent family members
 - Adult students living away from home
- Income not included in calculation
 - Minors
 - Income of live-in aides
 - Permanently absent family members



Property Ownership Verification

- Property owners contract with Approved Vendors (or agents/subcontractors) for solar installations
- Ownership verified through mortgage or property tax statement
- Occupants (whether property owners or tenants) must be income verified as applicable for each sub-program



Income Verification Process

- Relevant to Distributed Generation or Community Solar
- Using a tiered approach to minimize burden on participants and minimize the risk of capturing sensitive information
- There are three key steps for all methods:
 - Participant will **certify** their eligibility
 - Approved Vendor will **verify** their eligibility
 - Program Administrator will **validate** their eligibility
- There are four methods of verification, depending on sub-program



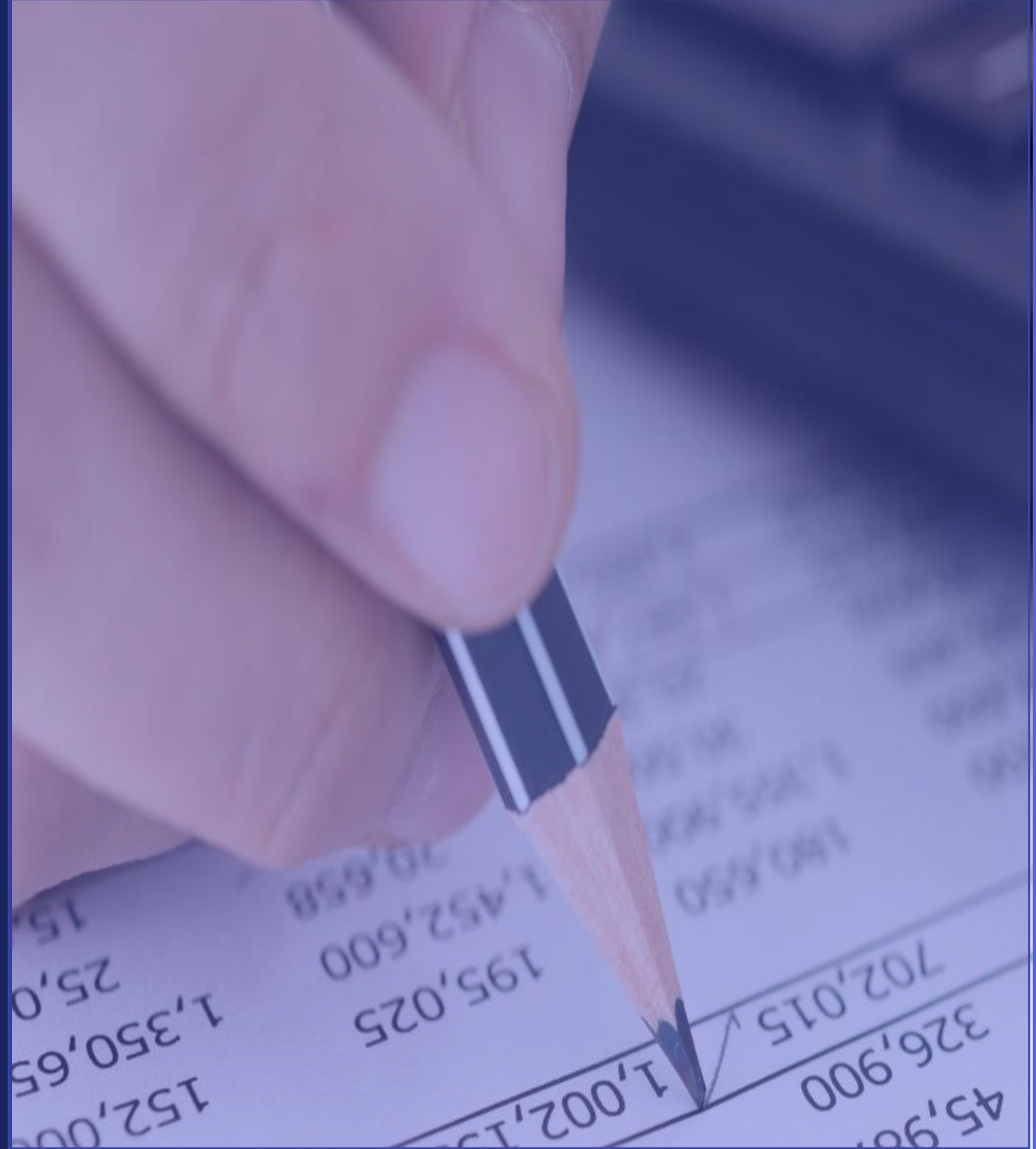


10. Thoughts or concerns about requirements for including or not including other adults in the household?
11. Thoughts or concerns about requirements for what income is included?



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Income Verification Methods



Method A: Third-Party Qualifying Program Verification

Supplemental Nutrition Assistance Program (SNAP)	Award Letter from Illinois Department of Human Services
Medicare	Benefit letter from the Social Security Administration or Current Red, White & Blue Card with a Medicare Number
Low-Income Home Energy Assistance Program (LIHEAP)	LIHEAP Award Letter from household's local Community Action Agency
Illinois Housing Weatherization Assistance Program (IHWAP)	IHWAP Award Letter from household's local Community Action Agency
HUD Project-Based Vouchers	HUD Award Letter or current statement
HUD Project-Based Rental Assistance	HUD Award Letter or current statement
Income-Eligible Multifamily Energy Efficiency Programs	Census tracts of 50% or more income eligible households
Tax-Subsidized Multifamily Programs	National Housing Preservation Database Report



Method A: Third-Party Qualifying Program Verification

1. Participant will **certify** current income eligibility using the Basic Information Form
2. Approved Vendors will determine if participant is enrolled in qualifying program
3. If Yes, the Approved Vendor will verify through required third-party program documentation
4. Approved Vendor submits a copy of the required documentation to the Program Administrator
5. The Program Administrator will **validate** and make a determination of eligibility



Method B: Credit Bureau Verification

1. Participant will **certify** current income eligibility using the Basic Information Form
2. Approved Vendor collects a completed Request for Transcript of Tax Return Form (IRS Form 4506-T)
3. Approved Vendors submits the form to Experian electronically to **verify** eligibility
4. Experian sends Program Administrator a determination within 48 hours
5. Program Administrator will **validate** eligibility



Method C: Tax Returns or Pay Stubs

1. Participant will **certify** current income eligibility using the Basic Information Form
2. Approved Vendors collects required tax forms, paystubs or other income documentation
3. Approved Vendors will **verify** household income according to guidelines of qualified income and household members
4. Approved Vendor submits documentation electronically to the Program Administrator
5. Program Administrator will **validate** eligibility



Method D: HUD Qualified Census Tract

1. For Low-income Community Solar only
2. Participant will **certify** current income eligibility using the Basic Information Form
3. Approved Vendors will **verify** address is within a HUD QCT using [ILSFA online tool](#)
4. Approved Vendors submits participant data with confirmed verification method
5. Program Administrator will **validate** eligibility



Tiered Process by Sub-Program

- Verification methods are recommended to be prioritized in the following way for each sub-program

Low-income Distributed Generation

- Third-party Qualifying Program
- Credit Bureau Verification
- Tax Return/Pay Stubs

Low-income Community Solar

- HUD QCT
- Third-party Qualifying Program
- Credit Bureau Verification
- Tax Return/Pay Stubs





12. What are the anticipated challenges with Vendors requesting, collecting, and transmitting customer data, and what are the suggestions for ameliorating those challenges?
13. Are the prioritizations of the tiered approach appropriate?
14. How should appeals to eligibility determination be handled?
15. Are there other income-qualifying programs that would be appropriate to add as a pre-qualifier?



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Other Eligibility Issues



Data Management and Validation

1. All participant data is captured using forms provided by the Program Administrator
2. All participant and verification data will be delivered electronically to the Program Administrator via the online Approved Vendor portal



Low-income Community Solar Subscribers, Shares, and Annual Subscriber Verification

1. First year annual report will include share of capacity data for all subscribers
2. New subscribers must be income verified
3. Subscribers already verified do not need to be re-verified
4. Requirement that 50% of system share after anchor subscriber be low-income households must be maintained at the annual review
5. For a delivery year, failure to meet committed subscription levels will trigger a collateral drawdown for a portion of 1/15 of total payment
6. Increases or decreases in qualified share at the first annual report will affect the REC payments accordingly moving forward





16. How can the Program Administrator prevent against customers or Approved Vendors acting in bad faith with regards to confirming customer verification?
17. Any other questions or comments?

Upcoming Sessions and Milestones

- Eligibility and Verification Feedback Sessions

- Program Launch
- Approved Vendor Portal Training



- Project Selection Process Feedback Session
- Inspections and Quality Assurance Feedback Session
- Project Approval Process Review





Program Contacts

Laura Oakleaf, General Program Questions

Laura.Oakleaf@elevateenergy.org

(773) 906-5134

Vito Greco, Technical Processes

Vito.Greco@elevateenergy.org

(773) 328-7011

Jan Gudell, Approved Vendor Processes

Jan.Gudell@elevateenergy.org

(773) 328-7010

Deborah Philbrick, Eligibility

Deborah.Philbrick@elevateenergy.org

(773) 321-2682

Kelly Shelton, Eligibility

Kelly@shelton-solutions.com

(773) 209-6868