

**Illinois Solar for All
Project and Participant Eligibility Public Comments**

Certasun

Dear Administrator:

Certasun is considering applying to be an Approved Vendor under Illinois Solar For All for Distributed Generation (1-4 unit buildings). We would like to provide a few brief comments on the Draft Site Suitability Guidelines.

Page 3 of the Guidelines states “Approved Vendors, as well as their Designees, installers and subcontractors, will follow these assessment protocols and ensure all requirements are met *before* contracting with participants.” (Italics added.) We do not believe requiring a site assessment as comprehensive as that described in the Guidelines prior a sale of a residential system is financially viable. In fact, no residential solar market in the U.S. we know about operates this way. Only a fraction of sales opportunities turn into contracts, so to require an assessment before contract would add significant extra cost.

However, we understand and appreciate the administrator’s goal of protecting consumers against surprise expenses. We would like to propose an alternative that we believe protects customers while avoiding unnecessary cost: allow homeowners to cancel their contract without penalty if the site assessment reveals remedial work the customer does not want to undertake. This would have three benefits. First, it would provide incentives for Approved Vendors to have their salespeople to avoid homes with obviously extensive problems. Second, it would allow detailed site assessments to be performed only on homes where solar is actually likely to be installed. Finally, it would allow those assessments to be conducted by a construction professional rather than a salesperson.

Can you please advise if this would be permissible to the Administrator for 1-4 unit residential distributed generation?

Sincerely,

Josh Lutton

Josh Lutton

President | Certasun | josh@certasun.com

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February 25, 2019

Mr. Anthony Star
Director
Illinois Power Agency
105 West Madison Street, Suite 1401
Chicago, Illinois 60602

Mr. Star,

Having just read through the Draft Eligibility Criteria for Illinois Solar for All Non-profit and Public Facility Incentives release, dated February 8, 2019, I must contest the fact that your agency has excluded one of the most essential public resources in a thriving community. The Solar for All program omits public libraries from participation yet allows other community agencies that perform similar functions as our library (i.e. community centers, and schools). It is my supreme hope that this public comment will provide support for inclusion of public libraries in this program as well.

Public libraries are the place people come to explore and understand new concepts and ideas. We are dedicated to informing our communities about the importance of sustainability. We feel that by adding solar energy we can serve as good stewards, and set the example for others to follow. We are well-equipped to provide educational, vocational and informational support to help Illinois achieve their renewable energy goals by 2025. Being able to add renewable energy through the Solar for All program will further help this aim.

On behalf of myself, and other Illinois public library directors dedicated to renewable energy, I ask that you please consider adding public libraries to the list of eligible agencies for the Solar for All Incentive program.

Respectfully,

Mary Aylmer, Director

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**Illinois Solar for All
Project and Participant Eligibility Public Comments**

Dominion Lighting and Solar

Hello,

I was present at the Stakeholder Feedback Session regarding Participant Eligibility and Verification Processes on Monday February 25, 2019 and provided feedback but was encouraged to send in written comments. Please let me know if you have any questions or need clarification on any of my comments.

-I think that Non-Profit/Public facilities do not necessarily have to be located inside of low-income communities to properly serve low-income communities ("low-income communities" as defined by ILSFA). There are facilities that are located adjacent to these communities who do just as good a job serving the communities without being inside of their boundaries.

Finally, I believe that the service providers listed below should be added to the "List of Qualified Critical Service Providers":

- Affordable Housing Developers
- Domestic Violence Help Centers
- Early Childhood Development Centers
- Family Support Service Centers
- Law/Legal Groups (Pro Bono or focused on low-income)
- Pregnancy Crisis Centers
- Student/Teacher Education Centers
- Transitional Housing Centers
- Women's Development Centers

Thank you,

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Christian Gauna | Grant Manager & Solar Consultant

[Dominion Lighting and Solar](#)

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To: Illinois Power Agency

From: Diane Fager, ONE Northside, Illinois Solar for All Working Group Member

Date: 03/13/2019

Re: Addendum to Working Group Comments on Project and Participant Eligibility and Verification Processes for Illinois Solar for All

The ILSFA Working Group understands that the process of Enrollment and Verification are extremely complex. Realistically, best practices will probably have to be implemented incrementally because database development and programming require time and money while the Solar for All Program is set to launch in weeks. But whether paper documents are used (such as the attached used in low-income solar programs in Connecticut) or databases are used, the Working Group strongly affirms the following:

- The enrollment and verification process for the consumer should be the ***least burdensome possible*** in meeting requirements. Simplicity is needed in general but especially with low income and EJ community residents whose lives are particularly challenging and complex.
- ***The highest levels of confidentiality should be maintained*** for customers' personal data especially for data that is protected by city, state and/or federal laws and guidelines.

Enrollment and verification for income-eligible programs is becoming increasingly computerized to reduce duplicative efforts particularly in regard to submission of documents needed to determine eligibility. Nationally, there are many examples of best practice. In Illinois the Illinois Department of Human Services, IDHS, and the Department of Healthcare Services, DHS, have developed a joint database to determine eligibility for multiple income eligible programs such as Medicaid, SCHIP and SNAP (food stamps) to name a few. The database in question accesses other databases that have client information needed for verification, e.g. access to the IRS database to determine wages earned. For these programs, a participant can show one or more pay stubs for most recent income verification but if more information is needed regarding wages earned through the prior fiscal year, that information can be accessed via the IRS database. Another benefit of this approach is that clients and application agents have portals to determine the status of the eligibility determination process. In the long-term, implementing such a tool would be useful in Illinois.

Another method of reducing the burdens of enrollment that is used in Illinois and many other states is "direct certification". Under this approach, if a household is already enrolled in an income-eligible program where the income is lower than 80% of the area median income as required by Illinois Solar for All, that household is automatically certified as eligible. For instance, if a family is receiving SNAP (food stamps), which is 134% of the federal poverty

level, they would be automatically deemed eligible. For programs in some states, not only are participants directly certified as eligible but they are actually directly enrolled through a passive renewal process. As the Solar for All program evolves, it may be valuable to explore how other benefits programs could be used to help connect eligible participants to the Solar for All program.

Besides simplicity, the other variable that the Working Group wants to affirm is the need for confidentiality of customers' data particularly for data that is already protected by federal, state and/or municipal laws. For instance, if clients are directly certified/deemed eligible because they are enrolled in SNAP, food stamps, federal law dictates very strict standards for how this information can be utilized, shared and even stored.

In order to adhere to legal requirements regarding confidentiality of data, the Working Group strongly believes that the Program Administrator needs to consult legal experts on income eligible confidentiality requirements and ensure that Approved Vendors are trained on these requirements and their practices are monitored and to verify compliance. Additionally, all organizations who receive grassroots education funding also need to be trained so that they can include this in their presentations. For many low income and environmental justice community members, this will be reassuring since confidentiality violations have occurred in other contexts and, unfortunately, persist, particularly when accountability/monitoring is not sufficient.

AFFIDAVIT CONFIRMING CUSTOMER QUALIFICATION FOR RSIP LMI INCENTIVE PROGRAM

The undersigned being duly sworn, deposes and says:

1. I, the undersigned, am over the age of eighteen (18) and understand and appreciate the obligations of an oath.
2. I am _____ of PosiGen CT, LLC, an entity formed and existing under the laws of Connecticut, and an approved contractor under the Residential Solar Investment Program (RSIP) (“Approved Contractor”).
3. _____ (“Customer”), a potential customer is interested in receiving the Low-to-Moderate Income incentive offered by the Connecticut Green Bank through the RSIP LMI Incentive Program.
4. I understand that Approved Contractor is responsible for verifying the income level of Customer and will make the determination as to whether Customer qualifies for the above mentioned incentive.
5. In order to ascertain the qualifications of Customer for the program, I have reviewed and have kept on file (check box):
 - a. Last two pay stubs for all members of the household who are 15 years old and older earning more than \$3500 a year and a list of the number of members in the household to confirm whether Customer’s household income level qualifies per the RSIP LMI Incentive Program Guidelines;
 - b. W2 from the previous year calendar year; or
 - c. Documentation of Customer’s current enrollment in one of the following programs: (check applicable item)
 - ___ Low Income Home Energy Assistance Program (LIHEAP)
 - ___ Home Energy Solutions – Income Eligible (HES-IE)
 - ___ Supplemental Security Income -Social Security (SSI)
 - ___ Supplemental Security Disability Insurance - Social Security (SSDI **not** SSD)
 - ___ Supplemental Nutritional Assistance Program (SNAP)
 - ___ Women, Infants, and Children (WIC)
 - ___ Temporary Family Assistance (TFA)
 - ___ Free and Reduced Price School Meals
 - ___ State-Administered General Assistance (SAGA) Medical Program
 - ___ Connecticut HUSKY
 - ___ Past two (2) consecutive years of Individual Tax Return (IRS Form 1040)
6. I Certify that as a result of this review, Customer has qualified for entrance into the LMI Incentive Program and acknowledge that improper certification of Customer shall subject Approved Contractor, amongst other things, to criminal or disciplinary action imposed by the Connecticut Green Bank pursuant to the Approved Contractor’s participation in the RSIP and the LMI Incentive Program, including but not limited to, probation, suspension, or termination from program participation, and/or suspension or termination of incentive or loan payments.
7. I further certify that I am authorized to execute and deliver this affidavit on behalf of the Approved Contractor.

Signature of Approved Contractor Date

Signature of Customer Date

Printed Name

Printed Name

Signature of Customer Date

Printed Name



List **ALL** individuals that live in my household: **15 years or older (check box)**

_____	<input type="checkbox"/>

If no Income, please complete directly below:

I, _____, affirm that the individuals listed below are over the age of 15 years, live in my household, and have had no income in the four weeks before the date this affidavit is signed below. This means they have not received income from but not limited to work, a pension, unemployment or worker's compensation, cash assistance from the Connecticut Department of Social Services (Temporary Family Assistance, State Supplement or the State Administered General Assistance program), benefits from the Social Security or Veteran's Administration, child support, interest, or any other income source.

List the individuals with **no current income** that live in my household.

I affirm that the information in this form is accurate.

Name: _____ Date:

Phone number: _____

To: Illinois Power Agency
From: Participants in the Illinois Solar for All Working Group
Date: 03/13/2019
Re: Illinois Solar for All Working Group Comments on Project and Participant Eligibility and Verification Processes for Illinois Solar for All

Dear Illinois Power Agency:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the Project and Participant Eligibility and Verification Processes 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:

Central Road Energy, LLC	ONE Northside
Environmental Law & Policy Center	People for Community Recovery
Illinois People's Action	Prairie Rivers Network
Little Village Environmental Justice Organization	Sierra Club Illinois
Metanoia Centers for Innovation	The People's Lobby
Natural Resources Defense Council	Vote Solar
New Life Ministries of Danville	

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; Grassroots Education and Approved Vendor components of IL Solar for All on January 9, 2019; Environmental Justice provisions of IL Solar for All on January 30, 2019; on Job Training provisions and Third-Party Evaluation provisions of IL Solar for All on February 7, 2019.

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.

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

• **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. 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 Project and Participant Eligibility 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 a great deal of care into incorporation of various requirements and goals aimed at ensuring high quality and well-monitored integration of workforce development with the incentive provision functions of the 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 Project and Participant Eligibility and Verification provisions of Illinois Solar for All. The Working Group agrees that the program should strive to deliver meaningful programmatic opportunities for low-income and environmental justice communities throughout the state. Equally, the Working Group urges the Administrator to continue to consider the broad and long-standing obstacles that disadvantaged communities, including environmental justice communities, face toward participation in like programs and processes.

The Working Group notes that such programs represent unprecedented systems to leverage programs and projects for resultant benefits for low-income and environmental justice community members. In light of this, the Working Group strongly recommends that these opportunities must be thoroughly monitored and connected such that full participation is truly possible by the groups who the program is statutorily intended to serve. The Working Group’s comments are focused on the need to ensure requirements are equitable and fair, and that there may be a variety of challenges encountered across the different incentive categories and project sizes covered by the program. Maintaining a contextual understanding of aforementioned dynamics will be key to eliminating undue obstacles for full participation by trainees and Approved Vendors alike. The Working Group commends the Administrator for their consideration of these key provisions critical to the success of the Illinois Solar for All program overall.

Project Eligibility and Opposition to Use of Lottery Mechanism

At the February 25th, 2019 Solar for All Stakeholder Engagement session, the Administrator indicated that a lottery was under consideration for ILSFA project selection.

The Working Group has deep concerns with the idea of utilizing a lottery in any part of the Solar for All project selection process.

A lottery incentivizes a greater number of entries, which, as we have seen with the Adjustable Block Program, can lead to project entries numbers wildly out of line with space in the program. This would undermine program goals and lead to unfulfillable community and stakeholder expectations. Furthermore it could also lead to situations in which vendors only

focus on meeting minimum lottery criteria, rather than maximizing the quality of their projects to meet the spirit and goals of the program.

The Long-Term Renewable Resources Procurement Plan and Future Energy Jobs Act provide sufficient frameworks to meet the spirit of the law and fully evaluate project proposals. The Administrator's present efforts to do so within the Approved Vendor Application process demonstrate the effectiveness of this framework for project selection. Furthermore there are other project selection models the Administrator can look to, outside of Illinois that eschew lotteries and use selection criteria, instead. The Department of Energy's Solar in the Community Program is one such model.

Project selection should consider the following criteria: (i) community engagement efforts; (ii) demonstrated participant benefit; (iii) community benefits; (iv) project readiness.

In closing, the Working Group holds that there are sufficient project selection models to draw from that utilize clear criteria to approve projects that drive the most community benefit and do not depend on a random lottery processes.

Project Eligibility: Low-Income Distributed Generation

The Illinois Solar for All Working Group appreciates this opportunity to provide comments on project and participant eligibility and verification processes relevant to the low-income distributed generation sub-program of Illinois Solar for All.

The Working Group strongly affirms the need for the Administrator to support solar installations on residential properties that serve low-income households, including both single-family and multi-family residences; to avoid upfront costs to participants; to limit ongoing costs and fees to 50% of the value of energy produced by the solar system; and to directly pass savings to Solar for All participants.

Ensuring Residents of Master Metered Buildings Are Seeing Savings

The Working Group supports Elevate's efforts to identify means beyond individual net metering to pass Solar for All value directly to participants. The Working Group was particularly pleased to see that the Administrator considers reduced and stabilized rents to be two means of passing program value to Solar for All participants. The Working Group would be deeply concerned to see those criteria removed from program guidelines.

In considering additional means of passing value to participants, the Administrator should avoid mechanisms that would lead to value qualifying as income. Such mechanisms would have implications for taxation and for participants' future eligibility for income-qualified programs.

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?

The Working Group commends the Administrator's attentiveness to the need for landlords to certify their commitment to keep rental units affordable, not to raise rents to market levels, and not to sell their property after a solar project is installed. These commitments will help avoid gentrification, displacement, and eviction - forces that disproportionately burden low-income and environmental justice communities. It would be inappropriate and unacceptable for the Solar for All Program to contribute to this disproportionate burden.

The Working Group recognizes the challenges involved in securing these commitments over a fifteen-year period and without implementing rent control policies. With that said, the Administrator is on the right track in considering how to certify such commitments.

One avenue to consider is a mechanism that claws back the remaining portion of the REC contract if the rents increase beyond inflation-based rates. Another avenue to consider is requiring periodic recertification that residences awarded Solar for All contracts continue to serve low-income residents throughout the life of the contract. The Administrator should weigh any impact such actions would have on program uptake and the ability to reach a diverse set of low-income households.

Project Eligibility: Low-Income Community Solar

The Working Group applauds the commitment the IPA and the Administrator have shown to the guiding principles of fostering community engagement, avoiding upfront costs, and limiting ongoing costs in the draft low-income community solar project eligibility requirements. Furthermore, we look forward to future opportunities for feedback on how to prioritize low-income community solar projects for selection - the Working Group believes it will be important to prioritize projects that drive the most community benefit. We offer the following comments in this same spirit.

Anchor Tenants

It was not clear in the presentation which REC price applies to the public or non-profit anchor tenant portion of a LI community solar project. The Working Group appreciates the clarity provided in the Administrator's guidance document. That is, a non-profit or public facility anchor tenant receives the the LI community solar REC price, not the SfA public or non-profit REC price.

The Working Group suggests that multiple anchor tenants be allowed if the anchor tenants are all public or non-profit entities eligible for the non-profit and public facility sub-program, with the caveat that the total amount consumed by all anchor tenants cannot exceed 40% of the LI Community Solar project capacity. We are concerned that it might prove difficult to identify a single non-profit or public entity that meets the low income requirements of the program and can consume the necessary power. With multiple non-profits or public entities allowed as anchor tenants, the LI community solar provider can utilize smaller electrical consumers as anchor tenants that may be closer, both physically and vocationally, to the community being served. We think that allowing for flexibility in this area would provide for projects that better match the overarching goals of the program and could be used to differentiate projects in the selection criteria phase.

LI Subscriber % Requirements

The guidance document allows up to 30% of a LI community solar project to consist of non-LI subscribers. The Working Group suggests that SfA LI community solar projects not be allowed to have any non-LI subscribers. While the Approved Vendor does not receive a REC contract for non-LI subscribed portion of a project, we are concerned that the economics of these projects may change in the future and incent project owners to replace low-income subscribers with non-low-income subscribers, even with financial clawback provisions in place. For example, if the price of power were to increase, it might incentivize a LI community solar project to drop LI subscribers. LI Community Solar projects are not without revenue for the unsubscribed portions of their projects: They will receive the avoided cost for the power generated by the unsubscribed portion of a project. Furthermore, we believe this step will reduce the administrative burden required to confirm a project's ongoing compliance with program requirements.

If the IPA decides to allow non-LI subscribers in LI community solar projects, the Working Group affirms that any portion of a LI community solar project that is subscribed to non-anchor, non-LI subscribers should not be eligible for REC payments.

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

The Working Group recognizes that there will be turnover in subscribers for LI Community Solar Projects. It is possible that a project could experience subscription loss just before reporting. Except for the first year (see below), we suggest that subscription percentage be determined by calculating the previous 12 months of power delivered to subscribers divided by the total power produced by the portion of the project not attributed to the anchor tenant(s). In order to not unfairly punish projects that experience inopportune turnover, we suggest that the projects be allowed leeway of 3% for a one year period prior to invoking any clawback provisions. For example, a project that has been paid for RECs at a 75% subscription rate could report a 72% subscriber rate without invoking clawback. They would need to achieve a 75% subscription rate or greater in their next report or the project would invoke the clawback provisions for whatever they are short in that year and the previous year.

For year one requirements, we support the IPA's and Administrator's position in the draft guidance that a project needs to have at least a 50% LI subscriber rate for that portion of the project that is not subscribed to an anchor tenant(s) to be awarded the initial REC payment. We also advocate that if the project does not have at least a 50% LI subscriber rate by the first year after energization, the project will lose its REC contract. For the first year only, the subscriber rate should be calculated by the total power subscribed (not delivered) to LI households divided by the total power projected to be produced by the portion of the project not attributed to the anchor tenant(s).

Project Eligibility: Nonprofit / Public Facilities

The Illinois Solar for All Working Group appreciates the opportunity to provide comments on project and participant eligibility relevant to the Nonprofit/Public Facilities subprogram of Illinois Solar for All, which supports solar projects installed on-site on properties occupied by a qualified nonprofit organization or public entity.

The Working Group expects strong interest in this subprogram given the oversubscription for the large distributed generation category in the Adjustable Block Program, but in contrast to the Adjustable Block Program, this subprogram is designed to serve and benefit low-income and environmental justice communities. Accordingly, the Working Group strongly affirms the Administrator's requirements that nonprofit and public facilities satisfy both locational and organizational eligibility criteria to ensure that this intent is met. However, we make the following recommendations as reflected in our specific comments below:

7. Comments on the requirement for non-profit/public sector customers taking service at public buildings to be sited within EJ and LI communities

The Working Group strongly supports the locational requirement that the property of the nonprofit or public facility hosting the on-site solar system must be geographically located within a qualifying Illinois Solar for All environmental justice or low-income community.

8. Comments on the community engagement aspects of Non-Profit/Public Facilities eligibility.

The Administrator proposes that the Nonprofit/Public Facilities subprogram should allow two paths for satisfying organizational eligibility criteria, including (1) satisfying the definition of Critical Service Provider *or* 2) demonstrating the required level of community engagement.

Although the Working Group affirms that both locational and organizational eligibility need to be met, we urge that the organizational eligibility be amended to require that nonprofit and public facilities meet *both* criteria identified above - that they satisfy the definition of Critical Service Provider and demonstrate the required level of community engagement.

The Working Group recommends that Critical Service Providers be subject to the same requirements for demonstrating sufficient connection to and input from low-income and environmental justice communities served by such providers. Otherwise, due to the expansive nature of the Critical Service Providers category (as reflected in the Administrator's list of over 25 qualified organization types) and the strong interest in the Nonprofit/Public Facilities Illinois Solar for All subprogram by those who are concerned about the accessibility [or availability] of Adjustable Block Program funds, the entire program could be taken up by Critical Service Providers who have demonstrated no connection to or input from low-income and environmental justice communities that they purport to serve.

Moreover, the Working Group is concerned that the Administrator's proposal for the critical service provider's required level of community engagement may not be sufficient. The Administrator recommends that community engagement can be shown by (1) providing a narrative summary of efforts taken prior to the application to conduct community outreach and education about the proposed entity being serviced by this installation *or* (2) 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.

However, in order to ensure that more robust community engagement occurs, all parties involved with having to verify that real and meaningful engagement has taken place, including applicants/Approved Vendors, nonprofit/public critical service providers, and community-based organizations that the applicant/Approved Vendor has partnered with, should demonstrate engagement. More sufficient levels of engagement could include multiple community meetings

with representatives and residents from low-income and environmental justice communities, along with showing how communities will have influence over the various aspects of the system development and installation.

9. Is handling requests for other types of critical service providers types appropriate to handle on a case by case basis?

The Working Group did not come to consensus about the list of Critical Services Providers included in the Administrator's proposal: a subset of Working Group members oppose the inclusion of emergency service agencies, such as police and fire departments, as potential recipients of incentives under this categorization because of strained relations between police and the community meant to be served by the incentive, while a subset of Working Group members support said inclusion based on the differences between municipalities throughout the state.

As far as other types of critical service providers that the Administrator may be requested to consider on a case by case basis, the Working Group strongly urges that any such considered providers must also demonstrate the the required level of community engagement by meeting requirements for sufficient connection to and input from low-income and environmental justice communities served by such providers.

Income Verification Methods

10. Thoughts or concerns about requirements for including or not including other adults in the household?

The Working Group is concerned that including adult students living away from home or temporarily absent family members as household members for the purpose of income verification may be over-inclusive and unrepresentative of how income sharing actually works for most low-income families. For many programs requiring income qualification, a household is defined as who is related and *living* together, so an adult living away from home is an unusual screen to add. In particular, the Working Group believes that adult students living away from home often use the small amount of income they receive to cover their own away-from-home living expenses. We recognize that excluding these adults from the income calculation may not be possible under every tax situation - e.g. when an adult is claimed as a dependent for tax purposes or when using another programs' definitions - however, where eligibility is calculated just for the Solar for All Program and would not complicate the calculation process, the Working Group recommends against the inclusion of these two categories of adults.

12. What are the anticipated challenges with Vendors requesting, collecting, and transmitting customer data, and what are the suggestions for ameliorating those challenges?

We appreciate the Program Administrators' thorough attention to the issue of verification of eligibility for the Illinois Solar for All Program. The proposed processes for confirming a households' eligibility to participate in the program have been well thought-out to minimize family burden. However, we are concerned about the potential burden for participating Approved Vendors, and about the security of families' personal information. We recognize that access to participating households' personal information is sensitive and recommend the Program Administrators consider the following recommendations.

First, we recommend that the Program Administrators work with other assistance providers who have developed a simple and streamlined method for verifying a household's income. It is our understanding that such a system exists in Illinois, which could mitigate the burden for Illinois Solar for All Approved Vendors in obtaining personal information and maintaining it securely. While opinions vary across providers, some solar providers are concerned about keeping customers' personal information, and customers rightly are concerned about sharing their personal information. A simple system operated through state agencies would mitigate these concerns.

Second, we note that a family who has been deemed eligible for, or is participating in, an existing assistance program may not have documentation available to share with an Approved Vendor, for purposes of establishing eligibility under Method A. In this case, an Approved Vendor may have difficulty verifying the participant's participation in a Third-Party Qualifying Program. It is our understanding that it may not be legal for these types of programs to share eligibility or participation information with entities such as Approved Vendors. We recommend that the Program Administrators seek a legal arrangement with other verifying organizations, so that Approved Vendors can obtain the verification needed.

Third, if a simple and streamlined, automated income verification system cannot be accessed at this time (though hopefully it will be made available in the future), and if an MOU with Third-Party Qualifying Programs cannot be agreed to (though, again, we hope that this is a possibility in the future), the Program Administrators should require Approved Vendors to have a plan for the collection, maintenance, and confidentiality of participating households' personal information. Program Administrators should conduct spot-checks to ensure adherence to the plan. It is of paramount importance that this information be safeguarded.

We are grateful that the Program Administrators are thinking about income verification in such a detailed manner. We hope that these suggestions are helpful for mitigating Approved Vendor and participating household concerns.

Illinois Solar for All
Comments on Non-Profit/Public Facilities Eligibility

Jason Tompkins

Good Afternoon,

I'm Jason Tompkins, tenant-member and former board member of [Qumbya Housing Cooperative](#). [Per public request](#), I wanted to offer some feedback on the ISFA criteria for Non-profits, that I hope will be taken into consideration.

Qumbya's been around Hyde Park for 30 years! We are a 501c3 group equity (aka "zero equity") housing cooperative, meaning we are essentially a "co-op of renters". As individual members, we don't accrue equity in the unit or property whatsoever, but we sign annual leases at rental rates below market value. As a 501c3 organization, Qumbya doesn't own the four properties outright, but leases them from two non-profit 501c25 Title Holding entities, which hold title and are responsible for the property tax liability. Qumbya does have board representation within these entities. Our properties are permitted as SRO's, or for "special use", so we aren't understood as typical "residential" use properties in many cases. Monthly rent and foodshare payments from our tenant-members is currently our only source of revenue; we don't receive any municipal, county, state or federal subsidies.

We appreciate all of the hard work by many various stakeholders to make this program a reality! Over the past few months, we have looked into roof installation solar options for us. My recommendations are based on that experience.

1) Income Eligibility (2.a) Exemption application process for Non-profit Housing Providers. After looking up our four properties in the [Income Eligibility Map](#), I see that one of our properties is within a block that doesn't qualify as income eligible.

As an organization with 501c3 status, our tenant-members disclose the *range* of their annual individual/household income, for the purposes of satisfying any audits by the IRS to confirm Qumbya's eligibility for tax-exempt status. We have the dataset to confirm that at least half of our tenant-member individuals and households at that property make 80% or less of the AMI. Having an exemption process for the Income Eligibility based on census block would be crucial to the inclusion of non-profit NGO housing providers that happen to operate in an area outside of the eligibility based on (possibly outdated) census data.

2) Specific Eligibility criteria and "best practices" around Third Party Ownership (TPO) Solar Power Agreement Vendors. I understand that the Federal Solar Investment Tax Credit is a completely separate program, however it would be instructive to specifically lay out Third Party Ownership (TPO) criteria and best practices, as a path for low-profit and for-profit SPA providers to partner with non-profits in financing a solar project.

For small non-profits, specifically non-profits that are also ****affordable housing providers**** that ****don't receive HUD contracts via transitional, recovery or "special needs" subsidies****, partnering with a low-profit or for-profit TPO that can take the SITC makes a SIGNIFICANT difference in financing a solar project. A key national player in this is [Collective Sun](#), however barriers to doing business with them

remain for many non-profit *housing providers** . Most of Collective Sun's business is with direct service, arts and/or faith-based orgs, for buildings that are permitted as places of worship or service centers, NOT buildings for residential use. They also require a minimum project size and net cost, that may be beyond the scope of what a smaller non-profit would need or can afford. Specifically for housing cooperatives across the state that follow the "group equity / zero equity" model, this is incredibly crucial. Awareness and Education around TPO criteria and best practices, and encouraging potential TPO Solar Power Agreements *should* be an integral part of Non-profit Affordable Housing inclusion into this programming.

3) Accessibility for remote Community Solar projects (within the State). I suspect that many Non-Profit Affordable Housing Providers that have an interest in this program, may not have the best specs for an on site, roof installation of a project. It would be helpful to tailor specific RFP's for Offsite Community Solar Projects (including Solar Flower, Mural or Sculpture etc.), in which Nonprofit Affordable Housing Providers (of all stripes) could partner with low-profit, for profit or public non-residential property owners and SPA providers / installers to apply. Perhaps this is a project that the [Cook County Land Bank Authority](#) could be involved in.

**Illinois Solar for All
Project and Participant Eligibility Public Comments**

Quercus Consulting

Thank you for the presentation yesterday. Below are comments to particular elements of the plan.

Low Income Community Solar

Participant Eligibility

- Requirement: Other than the anchor subscriber, all subscribers must be low-income households (defined as residential households that verify as 80% or less of AMI) in order to receive REC payments for those subscription shares. Any unsubscribed shares or any shares subscribed by subscribers that are not low-income households (outside the single anchor subscription) will receive no REC payments.
 - Comment: Subscribers other than the anchor and low-income households should be awarded the SFA REC value if those subscribers are public agencies or non-profits located in or serving a population located in an EJ/LI qualified Census tract, and the number of low-income household subscribers meets the threshold of 30% of total project capacity. For example:
 - 40% = Qualified anchor subscriber
 - 30% = Qualified low-income household subscribers
 - 15% = Institutional subscriber meeting anchor criteria (location and/or service)
 - 15% = Institutional subscriber meeting anchor criteria (location and/or service)

The rationale is that these additional subscribers serve the EJ/LI community, and will be able to re-direct their energy savings to services benefitting the community. It also feeds into the next comment.

Verification Process

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

- Requirement: Each participant's eligibility will be validated by the Program Administrator during annual reporting in the same way as during project approval at energization. The requirements that a minimum 50% system share (after excluding the anchor subscriber's share, if any) be allocated to qualified low-income households must be met at this time. The amount of incentive payment will be prorated, and contracts adjusted accordingly, based on the validated share determined by the Program Administrator after annual reporting. If the project fails to reach the 50% threshold, collateral will be drawn upon to claw back 100% of the allocated payment for that delivery year (i.e., roughly 1/15 of the total contract price).
 - Comment: If there is a concern that ongoing participation by low-income households will vary due to housing insecurity, mobility, etc., allowing the additional institutional subscribers to receive the SFA REC value could incentivize the Approved Vendor to enroll more than the 30% household subscribers. The rationale is that the additional institutional subscribers could allow the Approved Vendor to vary their percent of project capacity to enable the Approved Vendor to consistently maintain 30% of the

capacity for low-income households, as a hedge against fluctuation in this subscriber base, without risking their investment.

Thanks for your consideration,
Grace

Grace Troccoli Rink, LEED AP BD+C
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March 4, 2019

Trajectory Energy Partners, LLC
P.O. Box 310^[SEP]
Highland Park, IL 60035

Re: Illinois Solar For All - **Project and Participant Eligibility and Verification Processes**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the proposed Project and Participant Eligibility and Verification Process, and the thoughtful work that has gone into preparing the proposed eligibility and verification approach. Trajectory generally supports the approach proposed by the Program Administrator and offers the following feedback in response to the questions posed by the Program Administrator below. Please note that our comments throughout are focused on the community solar portion of the Illinois Solar for All program, although some of our comments are applicable more broadly. The numbering below corresponds to questions proposed in the February 25, 2019 Stakeholder Feedback Session.

3. Comments on the requirement that half the subscribers, outside of the anchor share, be low-income households.

Trajectory supports a minimum requirement that half of the subscribers, outside the anchor share, be low-income households. In addition, Trajectory would support the inclusion of a commitment to a higher share of subscribers being low-income as a project selection criterion.

4. Comments on the requirement that anchors that are not non-profit or public agencies get the ABP REC price.

Trajectory supports this approach.

5. Comments on the requirement that non- anchor subscribers that are not low-income households receive \$0 REC payments

Trajectory supports this approach, as it is consistent with the purpose of IL SFA funds being used to support low-income and environmental justice communities.

6. Comments on allowing one anchor tenant.

Trajectory supports this approach, but would ask for clarification regarding anchor tenants with multiple meters. Many non-profit or government entities have multiple meters spread across various facilities, all under the same master customer agreement with the utility. Can a single anchor tenant have multiple meters subscribed through one subscriber agreement, for either a single facility or for all of the facilities under an applicable master customer agreement? We would support the inclusion of anchor tenants with multiple meters in order to ensure that community solar projects can subscribe anchor tenants who are sharing the benefits of the project either across multiple facilities or within a facility with multiple meters.

12. What are the anticipated challenges with Vendors requesting, collecting, and transmitting customer data, and what are the suggestions for ameliorating those challenges?

With a smoothly functioning online portal for data verification, the majority of issues around transmitting data and tracking verification should be ameliorated. Given the small initial size of expected program awards for the first year, the Administrator should both require a detailed plan for the collection and tracking of data on the part of vendors, and include a spot check of these systems post REC award for all vendors. The Administrator should also anticipate that implementation will likely result in the identification of unanticipated challenges, and ensure that there are future opportunities for feedback and resulting programmatic improvements to customer data processes.

13. Are the prioritizations of the tiered approach appropriate?

Yes, Trajectory supports the approach and believes that the Administrator has devised a system that will ensure benefits are targeted appropriately, and minimize the resulting transaction costs for both vendors and subscribers.

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

The Administrator should institute a system of random checks on a small percentage of submissions for all vendors, with significant penalties if any vendor is found to be abusing the system.

17. Any other questions or comments?



Trajectory would like to comment on the indication by the Administrator during the February 25, 2019 presentation that a lottery element is being considered as part of the project selection criteria for IL Solar for All.

Trajectory strongly opposes any role for a lottery in project selection, and believes it is detrimental to the goals and high expectations among all stakeholders for Illinois Solar for All. If a lottery is used for final selection, vendors will have an incentive to simply meet the minimum criteria to be eligible for the lottery and go no further.

The Future Energy Jobs Act and the ICC-approved Long-Term Renewable Resources Procurement Plan lay out numerous criteria around the goals and expectations for the IL Solar for All program that can be used to prioritize and evaluate project proposals. In fact, in constructing the rubric for the Approved Vendor Application, the Administrator has demonstrated that it is possible to build a robust scoring system around the Illinois Solar for All program criteria and goals. There are many factors that distinguish individual projects which provide ample criteria to score and prioritize projects. At a minimum, these project-level criteria should include:

- Extent of community engagement;
- Extent of demonstrated benefits to participants
- Community-level benefits; and
- Project readiness.

Finally, Trajectory would note that the use of a lottery system is highly unusual in government contracting. Given the ambitious goals for IL Solar for All, the important precedent this program will set, and the initial low level of annual funding, this process is more akin to an RFP process. Energy-related programs at the state, local and federal level all use selection criteria to select projects without resorting to a lottery. At the local level, many municipal and county governments have used multi-variate selection criteria to select project vendors for clean energy proposals. At the federal level, the Department of Energy's Solar in the Community selects grantees from hundreds of applicants through an evaluation process without resorting to a lottery, as does the Department of Agriculture's various clean energy support programs. Based on the implementation process thus far, Trajectory has seen ample evidence that the Illinois Solar for All program can be successfully developed and deployed based on vendor and project-level assessments, rather than by random lottery.