

# Home Repairs and Upgrades Initiative Design Response to Comments

2025 - 2026 PROGRAM YEAR

## Overview

The Illinois Power Agency (the Agency) and the Illinois Solar for All (ILSFA) Program Administrator (the Program Team) have reviewed feedback from stakeholders and other interested parties on the proposed changes to the Home Repairs and Upgrades initiative (the “Initiative”) Design for the 2025-2026 program year. One party submitted written comments. Request for feedback on the proposed changes to the Home Repairs and Upgrades Initiative 2025-2026 Program Year Design was issued on May 12, 2025, with public comments due on May 19, 2025. The Program Team has considered these written comments and appreciates the thoughtful input provided by the commenting party.

## FEEDBACK :

“Thank you for soliciting feedback on this important pilot. For the most part, we have found the pilot to be very beneficial in assisting us with providing solar to those households most in need. As smaller companies, and we understand that the ILSA Program has a particular interest in assisting small emerging businesses, we have found a few challenges that if addressed, could really help our participation expand. To that end, we offer the following suggestions:

- Allow participating AVs to apply up to \$3000 of the roof repair allowance towards plywood costs without requiring photographs in advance. Assessment of plywood needs cannot be done until part of the roof is removed, therefore, we cannot know in advance what the precise need is. Should the funds not be needed, the approved amount could be reduced or fully deducted from the final REC payment based on the actual need.
- The requirement to carry the cost and wait for reimbursement remains a problem for some of us. In addition, the allowable maximum reimbursements are too low in certain circumstances. For instance, an older home with old circuits may require a lot more work than a newer home or even a whole new panel. These are likely the households most in need of financial assistance

and the project most likely to not be undertaken. Finally, for small and emerging companies, carrying a \$12,000 roof repair cost until REC payment is not feasible. Moving the REC payment up in time, and allowing for increases to the maximum reimbursement amount under special case-by-case circumstances could help address these issues.

- In some cases, an Approved Vendor's contractor may encounter unexpected and niche electrical safety issues that are not covered by the Program Administrator's list. For instance, a subcontractor found sporadically functioning light switches and outlets. Loose connections such as these can be a fire hazard and render a solar system a potential safety hazard if not addressed. In another case, an electrician discovered a wire running from the home to the garage that was periodically sparking and causing the power in the garage to work only 75% of the time. Again, electrical problems such as these, though not currently covered by the pilot, can render a solar system unsafe. We suggest allowing up to \$1000 for these unexpected issues on a case-by-case basis.

Thank you for considering these very real issues we are facing. We look forward to continue working in this pilot in the coming program year, and hope that it will become a permanent part of the program."

## **RESPONSE :**

The Program Administrator thanks the commenters for their feedback on the Home Repairs and Upgrades initiative and acknowledges that the commenters for the most part have found the pilot to be beneficial. The Program Administrator also acknowledges that, as "smaller businesses," the commenters have identified a few challenges that, if addressed, can help their participation expand.

- The Program Administrator agrees to include "decking" as a new eligible home repair item for this program year, increase the cost cap for structural repairs from \$2,000 to \$3,000, and to raise the total cost cap for Roof & Structural Repairs from \$14,000 to \$15,000. The new eligible item of "decking" will be included in the structural portion of the Roof and Structural Repairs and will be included in the same line item as "sister rafters", so that line item will be "sister rafter or decking". The Program Administrator believes that it will be rare for projects to need both sister rafters and decking. Additionally, based on the first two years of the initiative, the Program Administrator has observed that most projects requiring sister rafters have exceeded the current cap so that we will raise the structural cost cap to \$3,000. Additionally, the Program Administrator acknowledges the difficulty in assessing the condition of plywood and the need for sister rafters prior to the start of roofing work and agrees that photographs should not be required for sister rafters or decking for the Part I Application. The Approved Vendor should continue to provide a clear explanation of the repair necessity on the Reference List. If the repair is needed, the Approved Vendor must provide proof in the Part II application through photos of the damage or needed repair, both before any work is completed for that repair, and showing the completed repairs, along with the invoice showing the repair.
- The Program Administrator acknowledges that having to wait for reimbursement and the current cost caps continue to be a barrier for some Approved Vendors participating in the initiative. Still, offering a partial REC payment before Part II Approval is not authorized for the Illinois Solar for All Program pursuant to the IPA Act, which directs the Program's authority to facilitate REC payments. However, the Illinois Department of Commerce and Economic

Opportunity (DCEO) offers grants that provide pre-development funding for energy efficiency and renewable energy projects, including solar. The ILSFA team actively shares these funding opportunities with Approved Vendors and Small and Emerging Businesses as they become available. The initiative's cost caps are designed to accommodate homes requiring roof and/or electrical repairs to become solar-ready. While the Program Administrator recognizes that some homes may have unique needs that exceed these caps, maintaining the maximum reimbursement amount approved allows the Program Administrator to efficiently support more projects on homes in need of repairs.

- The Program Administrator acknowledges that some unexpected and niche electrical safety issues that are not currently covered by the initiative may potentially prevent projects from moving forward. However, the Program Administrator has found that such cases were rare in the first two years of the initiative. The current list of eligible items and cost caps has been effective in supporting the majority of households needing repairs to become solar-ready. While the initiative is designed to address most roof and electrical repair needs, the Program Administrator recognizes that some exceptional cases fall outside its scope. The Program Administrator will keep a log of special cases to assess the frequency of this need. Additionally, external funding may be available to assist homeowners with special cases.