



**Illinois Solar For All
Phase II Evaluation
Final First Interim Report**

April 2020

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Executive Summary

This report presents initial findings from the Phase II Evaluation of the Illinois Solar for All (ILSFA) Program. The ILSFA Program was mandated by the state's Public Act 99-0906, colloquially known as the Future Energy Jobs Act (FEJA), which was enacted on December 7, 2016 and went into effect on June 1, 2017. The ILSFA Program provides more generous Renewable Energy Credit (REC) contracts than those offered through the Illinois Adjustable Block Program (ABP) to overcome barriers to participation in the solar market faced by the low-income community.

Evaluation

The Illinois Power Agency (IPA) contracted with APPRISE, and its subcontractor Aeffect, Inc., to conduct an evaluation of the ILSFA Program. This evaluation report presents initial results from the Phase II Evaluation which was conducted from October 2019 through January 2020. Future evaluation research will include more detailed review of program implementation, barriers, accomplishments, and results as the program implementation progresses.

Illinois Solar for All Program Design and Implementation

FEJA required the development of the ILSFA Program to bring photovoltaics to low-income communities in Illinois. The objectives of the program are to maximize the development of new photovoltaic generating facilities, create a long-term, low-income solar marketplace throughout the State, integrate with existing energy efficiency initiatives, and minimize administrative costs.

FEJA mandated the ILSFA Program to include four sub-programs and indicated the funding percentages from the Renewable Energy Resources Fund (RERF) for each of the four sub-programs.

1. *Low-Income Distributed Generation (DG)*: This sub-program provides funding for photovoltaic projects located on individual homes and multi-family buildings, as well as for ground-mounted systems. Benefits to participants are achieved through net metering or reduction of energy costs.
2. *Low-Income Community Solar (CS)*: These projects provide the opportunity for participants to subscribe to a share of a CS system and receive credits on their utility bill for the energy produced by their share of the system. The projects must identify partnerships with community stakeholders where the project will be located.
3. *Incentives for Non-Profits and Public Facilities (NP/PF)*: Non-profits and public facilities may receive incentives for on-site photovoltaic generation. These projects must serve the energy loads of non-profit or public sector customers, be installed on facilities within low-income or environmental justice (EJ) communities within the State of Illinois, and either have a sufficient connection to and input from the low-income or

EJ community or be a qualified critical service provider, defined as a non-profit or public sector entity that offers essential services to low-income or EJ communities.

4. *Low-Income Community Solar Pilot Projects*: This sub-program is based on a competitive procurement approach for CS projects, based only on the price for 15 years of delivery of all Renewable Energy Credits (RECs). Payments will be made over the first ten years of the contract.

FEJA also allows stakeholders to propose alternative sub-programs to be approved by the IPA if they more effectively maximize the benefits to low-income customers.

Some of the key characteristics of the ILSFA Program are as follows.

- An emphasis on EJ communities and a requirement that 25 percent of the incentives for the first three ILSFA Program sub-programs are allocated within those communities.
- Requirements for community partnerships.
- Requirements for job training opportunities and hiring job trainees.
- Extensive consumer protections to ensure that participants receive the benefits of the ILSFA Program.

FEJA directed the IPA to develop a Long-Term Plan with a proposed approach to the design, implementation, and evaluation of the ILSFA Program. The Long-Term Plan was filed with the Illinois Commerce Commission (ICC) for review and approval on December 4, 2017 and was approved by the ICC on April 3, 2018. In 2019, the IPA undertook the Long-Term Plan update process. The ICC approved the Revised Long-Term Plan with some changes on February 18, 2020.

ILSFA Resources

The ILSFA Program is funded through three sources.

- **The Renewable Energy Resources Fund (RERF)**: This fund was created as a special fund in the State Treasury and is administered by the IPA for the procurement of renewable energy resources. The fund was created with Alternative Compliance Payments remitted by Alternative Retail Electric Suppliers (ARES) to comply with the State's Renewable Portfolio Standard established by the Public Utilities Act.

The IPA plans to allocate up to \$20 million per year from the RERF for the ILSFA Program. RERF funding for the DG, CS, and NP/PF sub-programs will be available for seven to eight years if fully spent each year.

- **Utility Funding**: A portion of the funds collected by the utilities under their Renewable Portfolio Standard (RPS) tariffs. Utilities will add an additional \$10 million in funding in 2018-2019, and \$11.7 million in funding per year in 2019-2020 and 2020-2021. The utility funding is not required to be applied in the same percentages as the RERF funds, but will be used to supplement the sub-programs that have used up their available funds from the RERF (but not provide funding for the Low-Income CS Pilot Projects sub-program). The IPA proposed in the Long-Term Plan that the utility funding would be

allocated to the three non-competitive sub-programs with the same relative weighting as the RERF funding.

- **Additional Utility Funding:** Additional funds from the utilities' renewable resources budgets were potentially available for program funding, however the triggering "funding shortfall" conditions have not been met.

Implementation Statistics

Elevate Energy, the Program Administrator, provided Approved Vendor (AV) data, project data, and participant data. Analyses in this report were based on the following data.

- Vendor registrations in the ILSFA Program database as of December 2019.
- Project applications and selected projects from October 2019 data for program year 2018-2019 and from December 2019 data for program year 2019-2020.
- Submitted participant income verification data from January 2020.

This section summarizes findings from analyses of those data.

- **Approved Vendors:** 32 vendors have been approved (up from 27 approved as of September 2019), five were under review, one was withdrawn, and one was rejected (because it was incomplete).
- **MWBE AVs:** While in September 2019, three of the 27 AVs were qualified as MWBEs, as of December 2019, four of the 32 Approved Vendors were qualified as MWBEs. One additional MWBE vendor was under review.
- **Project Applications and Selection:** Based on October 2019 data for Program Year 2018-2019 and December 2019 data for Program Year 2019-2020, the following number of projects were submitted and selected.
 - **NP/PF Projects:** 63 projects were submitted, 24 were eligible, and 24 were selected across the two program years. While seven projects were selected in the first program year, 17 were selected in the second program year. (All eligible NP/PF projects were selected.)
 - **CS Projects:** 75 projects were submitted, 56 were eligible, and eight were selected across the two program years, four in each year. The volume of submitted projects significantly exceeded the amount of funding available for the sub-program. The 30 submitted projects totaled \$148.8 million in incentive value compared to \$12 million in available funding.

- DG Projects: 12 projects were submitted, one was eligible, and one was selected in the second program year. The DG sub-program was not fully subscribed and additional projects can be submitted through June 2020.¹
- AVs with Selected Projects: There were 12 different AVs that had selected projects.
- Utility Territory: 21 projects in Ameren's territory and 12 in ComEd's territory were selected. 60 percent of the REC value was in Ameren's service territory and 40 percent of the REC value was in ComEd's service territory.
- Urbanity: 13 projects were characterized as being in urban locations, ten in suburban locations, and ten in rural locations. Seven percent of the REC value was in urban areas, 22 percent was in suburban areas, and 71 percent was in rural areas, due to the location of the large CS projects and the one DG project.
- EJ Communities
 - 19 of the 24 selected NP/PF projects were located in EJ communities.
 - Three of the eight selected CS projects were located in EJ communities.
 - The DG project was not located in an EJ community.
 - 71 percent of the REC value for NP/PF projects and 50 percent of the REC value for CS projects were in EJ communities.
- Low-Income Census Tracts
 - 23 of the 24 selected NP/PF projects were located in LI census tracts.
 - Six of the eight selected CS projects were located in LI census tracts.
 - The DG project was located in a low-income census tract.
 - 92 percent of the REC value for NP/PF projects and 99 percent of the REC value for CS projects were in low-income census tracts.
- MWBEs: Six projects were submitted by MWBEs, but none of the selected projects were submitted by MWBEs.
- Project Size: The mean size for the NP/PF projects was 152 AC kW and the mean size for CS projects was 971 AC kW. Four of the eight CS projects are larger than 1,000 AC kW. The selected 5+ unit DG project was 2,000 AC kW.
- Estimated Production: The mean production for the NP/PF projects was about 231 MWh per year and the mean for CS was about 1,910 MWh per year. The DG project size was 4,190 MWh per year.
- REC Value: NP/PF projects averaged about \$330,000 and the CS projects averaged about \$2.87 million in REC value. The DG project had a REC value of \$4 million.

¹ Nine additional small DG projects were submitted following the project submission window with a total capacity of 58 kW AC. These projects were approved by the ICC on March 4, 2020.

- **Participant Statistics:** Anonymized participant income and energy savings data were available for a small number of proposed DG projects that submitted income verification data. These data were used with ACS estimates of income and costs to estimate the impact of the ILSFA on energy burden.

Data provided as of January 2020 included information for one selected multi-family DG project and an additional 21 1-4 unit DG projects that were pre-application, under review, and dropped. Therefore the DG data is indicative of types of applications received and may or may not reflect projects ultimately approved for participation. Community Solar projects will include information on subscribers (and will be included in the evaluation) when they reach the next stage of project submission.

Energy value for the proposed DG projects with submitted data ranged from \$437 to \$1,332 and first year costs ranged from \$192 to \$585. (Note that some of these projects were not yet evaluated for eligibility.) First year savings were 56 percent of energy value for all customers because all projects were submitted by one AV with one business model.

Estimated production for the one selected multi-family DG project was 418,944 kWh, while production for the other projects ranged from about 5,000 kWh to 13,000 kWh.

Proposed projects reduced energy burden (electric costs divided by annual household income) from less than one percentage point for the higher income households to over 36 percentage points for the lower income households. The mean pre-solar burden was 12.8 percent and mean post-solar burden was 7.8 percent.

- **Grassroots Education:** There were 119 Grassroots Education activities completed from the initiation of activity through December 2019 (also including planned activities after that date). Overall, over 2,500 individuals attended the Grassroots Education events, based on reported Grassroots Educator numbers.

No events were held in 79 of the 102 counties, where 41 percent of the ILSFA-eligible households reside. While five counties had two events, only six counties had three or more events. Forty events were held in Cook County. There were large areas in the western and southern parts of the state where no events were held.

Eligibility Assessment

The Eligibility Assessment provides a profile of households that are eligible for the ILSFA Program using data from the American Community Survey (ACS). These data provide information on the characteristics of eligible households statewide and by county and represent IL in 2018.

Key findings from the Eligibility Assessment are summarized below.

- 39 percent of all households in Illinois were at or below 80 percent Area Median Income, and were therefore income-eligible for the ILSFA.
- 38 percent of all households in Illinois were estimated to be eligible for the ILSFA after removing those households that had no electric service or already had solar as their main heating fuel. The percent eligible ranged from 27 percent in DuPage County to 46 percent in Franklin, Jackson, Perry, and Williamson Counties. For a majority of counties, at least 30 percent of households were eligible for ILSFA.
- Households that are eligible for LIHEAP and the state-funded IHWAP programs have income at or below 80 percent of AMI. Therefore, participation in these programs is used to provide income verification for ILSFA.
- The relationship between 80 percent AMI and federally-funded IHWAP eligibility guidelines varies across the state. 99 percent of customers who are eligible for Federal but not State-Funded IHWAP are still eligible for the ILSFA.
- While 25 percent of Census Block Groups in Illinois were designated as EJ communities, this represented 22 percent of households in the state. 61 percent of households in EJ communities were eligible for ILSFA (income and electricity usage characteristics), compared to 36 percent of households outside of EJ communities.
- 32 percent of households in Illinois were in LI communities. 61 percent of households in Low-Income Communities were eligible for ILSFA, compared to 32 percent of households that were not in Low-Income Communities.
- 26 percent of ILSFA-eligible households spoke any language other than English at home, and 15 percent spoke Spanish at home. The percent of ILSFA-eligible households that did not speak English at home was greater than 15 percent in 13 counties.
- Electric burden averaged five percent for ILSFA-eligible households, and it averaged eight percent for single-family households that use electric heat. The mean electric burden for ILSFA-eligible households with electric heat was more than ten percent in 11 percent of IL counties, and the mean electric burden for ILSFA-eligible households with non-electric heat was more than eight percent in 11 percent of IL counties.

Approved Vendor Feedback

APPRISE conducted telephone interviews with 22 of ILSFA's 30 AVs (approved as of November 2019). These interviews assessed vendors' initial experiences with the ILSFA Program. *This section provides information on the AVs' views and opinions. Statements that were made by the AVs and that are reported on in this section may include suggestions that are inconsistent with the statutory requirements of the ILSFA and/or the ICC approved program design. Additionally, recommendations in this section are those made by the AVs, and may not represent the opinions of APPRISE or the IPA.*

Key findings are summarized below.

- 15 of the 22 AVs reported that the AV registration process was easy or somewhat easy. Six said it was difficult or somewhat difficult, and one said it was neither easy nor difficult.
- 12 AVs identified areas of difficulty with the registration process. They stated that the requirements were unclear, there was too much detail required, and they had issues with the community engagement questions.
- 14 AVs reported that Elevate reached out to them to see if they needed assistance with the AV registration, and nine vendors reported that they reached out to Elevate for assistance. All nine vendors that asked Elevate for assistance with registration reported that Elevate was responsive and helpful.
- The most common recommendations for the AV registration process were to clarify the application instructions, reduce the application length, collect more of the information during project application instead of registration, and provide more frequent updates on the registration process. Vendors recommended reducing the length of the registration application by removing repetitive or unnecessary questions or requiring fewer narrative responses. Vendors recommended that the ILSFA Program clarify application instructions by using clearer language, emphasizing the Adjustable Block Program (ABP) registration requirement (AVs must register for the ABP prior to registering for the ILSFA), and stating what details should be provided in the narrative responses.
- 14 of the 22 AVs reported that the project submission process was at least somewhat challenging and 11 reported that it was challenging or very challenging. They were most likely to state that the challenging aspects of project submission were the unclear application, the interconnection agreement², the project eligibility requirements, and the volume of required information.
- AV recommendations for project eligibility and submission focused on providing clearer instructions, the project submission timeline, interconnection agreements, and EJ community self-designation. Three vendors recommended that the ILSFA Program allow vendors to wait to complete their interconnection agreements and pay the full upgrade costs until after the project is selected.³
- 17 of the 22 AVs reported that the portal was easy or somewhat easy to use for the AV registration. Only one said it was somewhat difficult. 14 of the 22 AVs reported that the portal was easy or somewhat easy to use for project submission, and seven said it was somewhat to very difficult. AVs reported that they faced challenges uploading

² The interconnection agreement is between the system host and the utility, and is external to the ILSFA Program.

³ Rules related to interconnection costs are outside the control of the ILSFA Program. The upfront payments for interconnection agreements are refundable deposits (net any costs incurred by the utility). This may not have been fully understood by the AVs.

information⁴, accessing applications, and understanding instructions in the portal. They said that documents were sometimes not successfully uploaded, they cannot make changes to submitted applications, and they do not receive confirmation of successful receipt of documents.

- AV portal project submission recommendations related to information/document uploading, additional capabilities, and clearer instructions. Three vendors recommended that Elevate allow vendors to include all information in one workbook uploaded to the portal, instead of various uploads. One vendor recommended that the ILSFA Program use the submission portal as a central repository for all submitted documents, as opposed to needing to email documents that are requested after the project has been submitted (because additional uploads cannot currently be made). AVs recommended that the ILSFA allow them to edit responses and provide requested resubmission information in the portal, instead of via email.

Recommendations for clearer project submission instructions in the portal included providing an information icon next to each question to see a more detailed explanation of that question; more detailed descriptions of what Elevate is looking for in the vendors' responses; and a "test" project submission page, in which vendors can click through each page of the portal without having to input any information.

Vendors would like to see various additional capabilities in the portal for project submission. These capabilities include providing the ability to save and return to project submissions, a confirmation message when documents and batches have been successfully submitted, spaces for vendors to upload additional clarifying information, and a "Not Applicable" checkbox.

- 19 AVs reported that Elevate reached out to them to see if they needed assistance with the project application, and 20 vendors reached out to Elevate to obtain assistance with the project application. AVs were most likely to request assistance with the portal, project submission requirements, required documentation, and ILSFA guidelines. 18 of the 20 AVs that requested assistance reported that Elevate was at least somewhat helpful.
- Five AVs expressed dissatisfaction with project selection and five expressed satisfaction. AVs made suggestions about project selection criteria, MWBE scoring, and the transparency of project selection. Three vendors requested that the ILSFA Program provide more feedback about why projects were/were not selected.⁵ Two vendors

⁴ Elevate reported that they were aware of one case where the AV was not able to upload a file because the file size was too large. They have also had questions about where to upload some documents.

⁵ Scoring of projects was based on a protocol published prior to when the submission window opened, and the scoring for each project was released prior to the final selection.

recommended that the ILSFA Program provide point(s) for vendors that are committed to working with MWBEs, even if the vendor is not an MWBE.⁶

- Only two of the 12 AVs that submitted CS and/or DG projects reported that they had performed the income verification process.⁷ Two vendors suggested that the ILSFA Program have customers send their income verification documents directly to the IPA or Elevate Energy.⁸ One vendor recommended that the ILSFA Program change the income eligibility requirements for DG projects to match the requirements for CS projects to simplify the income verification process.⁹
- For future projects, 20 AVs were considering NP/PF projects, 12 were considering CS projects, and nine were considering DG projects. Seven additional vendors reported that they may consider submitting DG projects in the future.
- All AVs attended at least one AV training session. 21 of the 22 vendors reported that the trainings were useful or somewhat useful. The topics they were most likely to highlight from the trainings were the project submission process and the AV registration process.
- 20 of the 22 AVs reported that the AV manual is at least somewhat helpful and 8 said it was very helpful. 14 stated that they referred to the manual frequently. AVs provided recommendations to consolidate the information in the manual, make it easier to navigate, and clarify the registration and project submission processes. Currently the program requirements are scattered through the manual and it can be difficult to find the required information.
- 15 of the 22 vendors reported that they use the ILSFA website frequently. They were most likely to use the website to access the project dashboard, view EJ and LI maps, download the AV manual and other resources, obtain the ILSFA brochure, and obtain program and funding updates. Four AVs said the website was very useful, 12 said it was useful, and six said it was somewhat useful.
- Vendors made recommendations about the project dashboard on the ILSFA website. Two vendors would like the ILSFA Program to clearly provide information about how much funding is left in the program on the project dashboard. Two vendors would like Elevate to update the dashboard more frequently (daily, weekly, or every two weeks) so

⁶ The Revised Long-Term Plan broadens the definition of a MWBE and provides for a substantial overhaul of the project selection protocol.

⁷ Elevate has not yet conducted formal validation of any income verification efforts. The one approved DG project used rent rolls as a verification option. CS projects are not required to submit income verification for subscribers until they energize.

⁸ The Revised Long-Term Plan will include an option for the Program Administrator to perform the income verification.

⁹ The IPA did not (and does not) support this idea, as it developed the Revised Long-Term Plan. With the Revised Long-Term Plan now approved by the ICC, any changes to the income eligibility verification would require a subsequent modification to the Long-Term Plan.

that vendors can have more up-to-date information about the funding remaining in each sub-program.

- Four of the AVs who participated in the stakeholder feedback process felt that their ideas were heard and taken into account, and six said they felt they had an impact on ILSFA development.
- Only four of the AVs had participated in a Grassroots Education event, and four stated that they received ILSFA interest and questions as a result of Grassroots Education. One vendor recommended that educators invite successful participants (low-income households who participated in ILSFA) to speak at events and/or host events at project sites to increase the credibility of the program and the vendors. One vendor recommended that educators develop a list of job trainees in their community to provide to vendors.¹⁰ Another vendor recommended that GEs work with Elevate to create a database of consumers who are interested in participating in the ILSFA.

Stakeholder Outreach Design and Feedback

Stakeholder outreach is an important component of the ILSFA Program. The evaluation engaged in the following activities in the current period to assess the stakeholder feedback process and collect additional feedback from stakeholders.

- Reviewed the ILSFA Program materials available on the website.
- Interviewed IPA and Elevate Energy managers and staff.
- Conducted an ILSFA Evaluation Workshop.
- Interviewed 11 ILSFA Program stakeholders who participated in the stakeholder feedback process, and seven ILSFA Program stakeholders who did not participate in the process.

Stakeholder Evaluation Workshop

The Stakeholder Evaluation Workshop was held on December 10, 2019 to obtain feedback on initial evaluation research and ongoing planned research. The workshop was held in Chicago and participants were also given the opportunity to participate by webinar. Approximately 20 attended in person and 37 in the webinar.

The presentation covered the following topics.

- APPRISE Background
- ILSFA Overview
- Phase I Evaluation Research Conducted, Findings, and Recommendations
- Phase II Evaluation Plan Metrics, Research Activities, and Timeline

Many of the questions from workshop participants focused on the design and implementation of the ILSFA rather than on the evaluation, the findings, and future evaluation research.

¹⁰ Any distribution of customer information must go through Elevate Energy to ensure that information is distributed to all Approved Vendors.

The discussion during the workshop showed that many are still confused about aspects of the ILSFA Program and have concerns about program requirements, access by minorities and underserved communities, barriers to participation, and lack of participation in the DG sub-program. Several questions addressed the difficulty of locating information on the ILSFA website and the need for greater outreach to underserved communities.

Nonparticipating Stakeholder Interviews

The following interviews were conducted with nonparticipating stakeholders.

- Three were conducted with Community Action Agencies (CAAs).
- Two were conducted with non-profit environmental protection and sustainability advocacy organizations.
- Two were conducted with local government agencies with responsibilities for low-income energy, weatherization, and housing assistance.

Six of the nonparticipating stakeholders said their organization frequently participates in advocacy and public feedback, and one interviewee indicated that their organization occasionally engages in those types of activities.

The seven nonparticipating stakeholders had not been aware of opportunities to provide feedback on the ILSFA. Six of the respondents said they did not feel the outreach effort had been sufficient given their lack of awareness of the opportunities to participate.

Six of the respondents said that the ILSFA should increase their outreach efforts and do more to ensure that CAAs, non-profits, and targeted municipalities receive direct contact from ILSFA representatives. They recommended the following additional outreach actions.

- Two said that ILSFA should reach out to the Illinois Association for CAAs.¹¹
- One said that an ILSFA representative should present at the annual conference for Habitat Illinois.
- One recommended that ILSFA include information in the “Earth Connect Newsletter” that is sent out to environmental non-profit organizations.

When asked if their organization planned to provide feedback on the ILSFA in the future, six respondents said that they would provide feedback if they are made aware of opportunities to do so.

Participating Stakeholder Interviews

The following interviews were conducted with participating stakeholders.

- Three interviews were conducted with non-profit advocacy organizations that focus on environmental protection and social and economic justice.
- Three interviews were conducted with solar consultants and sub-contractors.
- Two interviews were conducted with ILSFA Approved Vendors.
- Two interviews were conducted with ILSFA Grassroots Educators.

¹¹ Elevate reported that they provided an overview of the ILSFA Program at a CAA meeting on May 7, 2019.

- One interview was conducted with an equity housing cooperative.

Respondents said they participated in the stakeholder feedback process in the following ways.

- Eight of the 11 participating stakeholders said that they attended ILSFA presentations.
- Seven said they listened to recordings of the information and/or feedback sessions posted on the ILSFA website.
- Seven said they offered comments on the ILSFA.

Participating stakeholders were asked how they had learned about opportunities to provide feedback on the ILSFA Program. They offered the following sources of information.

- Three learned about feedback opportunities via emails from the IPA.
- Two heard about the feedback opportunities through the Illinois Solar Energy Association.
- One each read about the stakeholder feedback process on the ILSFA website, heard about ILSFA feedback opportunities at an informational event for AVs in the ABP, through working as a consultant for an ILSFA AV, through the Illinois Clean Energy Jobs Coalition, and from a member of the Cook County Board of Commissioners.

Stakeholders were asked if they felt the ILSFA Program provided a sufficient amount of outreach to encourage participation in the development process.

- Five felt that the outreach efforts were sufficient.
- Two said that the outreach had not been sufficient, especially in minority communities.

Eight of the 11 participating stakeholders felt the ILSFA Program could have taken additional actions to solicit stakeholder feedback and participation.

- Two said the ILSFA should engage in grassroots organizing.
- Two said the program should engage more stakeholders from minority communities by advertising on Black media outlets and building relationships with local elected officials and church leaders.
- One each said the program should shift its outreach efforts from DG projects to CS and NP/PF projects, shift outreach efforts to organizations that work with potential low-income participants, and engage a greater number of potential vendors.

Five respondents said they experienced barriers to the stakeholder participation process.

- Two said that due to systematic/structural racism, ILSFA outreach efforts have been focused mainly on low-income white communities at the expense of African American and other minority communities.¹²
- One said that information on feedback opportunities was not very specific and difficult to find.

¹² Future evaluation reports will examine the demographics of communities where events were held.

- One said that the complexity of the ILSFA brochures is a barrier to participation because they are cumbersome to read and make the program seem unappealing to stakeholders and potential participants.

Stakeholders provided the following additional comments on the stakeholder outreach process.

- Two said the ILSFA needs to do more to encourage the participation of minority and low-income community members and organizations, including offering financial incentives to help offset the costs incurred by taking time away from work to participate.¹³
- One said that the ILSFA brochures and marketing materials should be simpler so that the program seems more salient and appealing to relevant stakeholders in the low-income community.
- One each recommended an informational event targeted specifically at housing cooperatives in the Chicago area, stated that the Illinois State Government should do more to promote the program, commented that the outreach efforts had been excellent, and said that there was not enough participation from faith-based organizations and labor unions.

Six participating stakeholders provided comments on the ILSFA's key evaluation metrics.

- Three felt they need to include the demographic makeup of participants served by each project to ensure that the program is not neglecting minority communities.¹⁴
- One said they should include the number of participants served and the savings realized by participants for each project.
- One said they should include the geographic location of each project to ensure that ILSFA projects are available across the state and not just in a few select locations.

Participating stakeholders were given the opportunity to provide any final comments or recommendations for the ILSFA Program. They offered the following responses.

- One reiterated that the ILSFA brochures and informational materials need to be simplified to appeal to a wider audience.
- One indicated that the website should be reorganized to facilitate easier navigation.
- One recommended that the ILSFA provide a report specific to non-profit community organizations detailing opportunities for them to get involved in the NP/PF and CS sub-programs.
- One said the DG sub-program should be restructured so that the vendor is no longer responsible for customer identification, income verification, and aggregation, and it is instead done by a non-profit.
- One recommended that the ILSFA reach out to organizations operating in minority communities more frequently to build a better relationship with minority community members.

¹³ The IPA does not have the authority to spend ILSFA funds for this purpose.

¹⁴ These data are currently being collected for ILSFA participants.

- One recommended that the ILSFA hire a firm to facilitate connections between the program and members of minority communities.
- One said the size of his company, and limited access to financial resources, was a barrier to participation.
- One would like to see the ILSFA do more to encourage small businesses to participate in the program.

Program Administrator Assessment

This section assesses Elevate’s accomplishments in their various areas of responsibility in the ILSFA Program.

- Outreach: Elevate’s outreach did not appear to reach many potentially important stakeholder groups.¹⁵ This has resulted in a lack of information about and participation in the ILSFA across many relevant organizations including Community Action Associations (CAAs), low-income advocacy organizations, environmental and sustainability groups, and neighborhood organizations.

Elevate also appears to be taking a somewhat more narrow role in connection-building than one might expect, given the importance of connections in the success of the ILSFA. Future success of the ILSFA may depend on forging greater connections, and Elevate should discuss a broader outreach and communications role with low-income households, energy efficiency programs, and job training organizations to promote these important linkages.

- Call Center: Elevate Energy has a call center to field questions about the ILSFA and provide guidance and information. Elevate’s call center metrics report does a very good job of providing information on the volume and type of calls handled.
- Program Materials: Elevate developed many guidelines and materials for the ILSFA Program before and shortly after the ILSFA Program launch within a short period of time. Users of these materials, including stakeholders, AVs, and GEs, have noted that the materials are complicated, unclear, and difficult to navigate.¹⁶ The Phase I Evaluation Report made recommendations for organization and reading level. However, it does not appear that many of the recommendations have been implemented to date.
- ILSFA Website: Elevate Energy created the ILSFA website and works to ensure that all ILSFA Program information is on the website and up-to-date. Initial response to the website acknowledged the vast amount of information that is available, and the usefulness of that information. However, there is agreement that the website is not well-organized and information can be difficult to locate.

¹⁵ Elevate relied on the ILSFA Working Group which serves as an umbrella organization of stakeholders including many key community organizations.

¹⁶ These documents were created in collaboration with the IPA. The IPA has been cautious and thorough in editing these documents and that has contributed to the complexity of the materials.

Elevate acknowledged that they had not yet made many revisions to the website based on the feedback that they received and they still need to streamline the website based on recommendations in the Phase I Evaluation Report.

- **Approved Vendor Portal:** Elevate Energy maintains a portal that includes information on AVs, projects, participants, and Grassroots Education. They had a short window to design and implement the portal before the program went live, and some of the details and internal checks in the system were still being improved at that time. They state that they continue to face challenges due to the fact that the requirements are still developing and the scope continues to change, with updates that need to be made on quick turnaround.

The AVs reported many challenges with the portal and Elevate's vendor managers have spent a great deal of time supporting AVs in using the portal and responding to their questions and problems. Elevate described several improvements they have made to the portal since its initial introduction, primarily the incorporation of data entry and calculations directly into the portal (instead of in separate Excel spreadsheets).

Based on feedback from the AVs, including specific information about challenges with and errors on the site, it appears that additional improvement is needed. A key feature that is needed is the ability for vendors to save parts of their application as they are completed, and to return to the application at a later time.

As with the ILSFA website, Elevate has not made many of the suggested and important updates to the portal to make it more user-friendly and ease the project submission process.

- **Grassroots Education:** Elevate Energy is responsible for coordinating the distribution of funding for Grassroots Education by CBOs and overseeing the Grassroots Educators' (GE) work. Eleven GEs were initially selected through a Request for Proposal (RFP) process in the spring of 2019.

Elevate released an RFP at the end of January 2020 for the second round of selection of GEs, with their work expected to begin in June 2020.

The evaluation research found that 119 events had been completed or planned by GEs and these events reached a total of over 2,500 participants. However, no events were held in 79 of the 102 counties and there are very large regions in the western and southern parts of the state where no activities were held. The counties where the events were held make up approximately 59 percent of ILSFA-eligible households. The next

GE RFP should work to recruit and contract with organizations in the other parts of the state.¹⁷

- **Vendor Administration and Support:** Elevate Energy has responsibilities for administering and supporting the vendor registration and project submission process.

Interviews with Elevate staff and AVs show that Elevate has provided extensive support to the AVs throughout the registration and project submission process. AVs spoke favorably about their experience with Elevate and the tremendous assistance that Elevate provided. The AV support is clearly an area where Elevate has excelled. Further improvement of the portal will reduce the need for assistance from many of the AVs. However, due to the fact that some of the AVs have limited experience with databases, some will continue to require such support.

- **Environmental Justice Communities:** Elevate was responsible for working with the IPA to develop the EJ community determination process and the self-designation process. They developed a rigorous and well-documented process for determining the EJ communities, and the map and list of EJ communities is provided on the ILSFA website.

Elevate now continues to work with the IPA and community groups to score incoming EJ self-designation applications. They have also developed a systematic process for this scoring and meet with the scoring group on a regular basis to score EJ self-designation applications as they come in.

- **Reporting:** Elevate is responsible for providing quarterly reports to the IPA and the ICC on the status of the program, including number of applications received, number of applications approved, number of projects completed, REC payments, payments for Grassroots Education efforts, status of Grassroots Education, and technical assistance provided. Elevate has been working to develop these drafts and discussing the proposed reports with the IPA. The report format was recently finalized with the IPA and the ICC.

Elevate has developed comprehensive and useful reports on call center metrics, technical assistance, newsletters, and use of the ILSFA website. However, they have not provided a report that summarizes the progress of the program. Prior to approval of the quarterly report format, Elevate should have delivered a periodic report to the IPA that summarized the program progress as required in the planned quarterly report. This would be useful information for the IPA to have in summary format, even if the eventual report format was to be revised by the IPA or the ICC.

¹⁷ Elevate reported that they are working to reach as many areas of the state as they can with the current GE RFP. They have shared the RFP through their usual channels and have reached out to partner organizations to ask them to share the information. Elevate stated that the Illinois Association of Community Action Organizations and the Illinois Environmental Council shared the RFP with their memberships. Elevate is also sending press releases to central and southern Illinois news outlets.

- **Quality Assurance:** Elevate is responsible for developing a process for quality assurance, including photos of projects under construction and on-site inspection of a random sample of installations. Projects have not yet reached the stage when quality control will be undertaken. However, Elevate has developed an Onsite Inspection Checklist. The Onsite Inspection Checklist is a comprehensive form that will systematically collect important information on the quality of the installation and the AV's work.

Key Findings and Recommendations

This section presents key findings and recommendations from the research presented in this report.

Key Findings

The key findings from the initial Phase II Evaluation are summarized below.

- *Vendor Participation:* Vendor participation, if measured by the number of AVs, is sufficient to implement the program. However, more vendors will need to participate in the DG component as the program moves forward to ensure success of that program.
- *Vendor Diversity:* None of the selected projects were submitted by MWBEs, and there is a concern that there is a lack of vendor diversity.
- *Project Submission:* The project submission process is challenging and cumbersome. This prevents some AVs from submitting projects and others from submitting projects that are deemed eligible.
- *Participation:* The ILSFA Program has now been successful in accomplishing participation in all four sub-programs. However, the DG sub-program only had one maximum-sized project for a large multi-family building, and there is still concern about the feasibility of participation in the single-family DG program with individual participant-sized systems.
- *Project Size:* Four of the eight selected CS projects were larger than 1,000 AC kW. The DG project was 2,000 AC kW. There is a concern about the economies of scale for smaller projects.
- *Marginalized Communities and Diversity:* The program has reached EJ communities and LI communities. However, there are opportunities to ensure that there is more diversity in geography and urbanity, as well as participation by minority businesses.¹⁸
- *Program Administrator Assessment:* Elevate developed the foundation for the ILSFA Program and has facilitated participation in all sub-programs. They have a dedicated

¹⁸ Only seven percent of the REC value was in urban areas. While 29 percent of the NP/PF REC value was in urban areas, one percent of the CS value was in urban areas (this reflects only the location of the CS project, not the subscribers once the projects are energized), and none of the DG value was in urban areas. No MWBE businesses have had selected projects.

and invested team of professionals that are committed to developing this important program. However, there are several areas where improvements are suggested.

Elevate's many accomplishments include the following.

- Call Center: The call center responded to calls and information requests from a diverse group of program actors.
- Materials and Guidelines: Numerous documents, created during a brief program development period, provide the key requirements and forms for the program.
- ILSFA Website: The ILSFA website provides a wealth of information on the program and serves as an important information source for stakeholders, GEs, vendors, and potential participants.
- Portal: The Salesforce-based system collects and manages information on AVs, projects, participants, and Grassroots Education.
- Grassroots Education: 11 GEs were contracted and they conducted over 100 activities and reached over 2,500 individuals.
- AV Support: AVs received extensive support from Elevate in the registration and project submission process and view Elevate as a critical program resource.
- EJ Community Designation: The EJ determination uses a rigorous and well-documented process, and the self-designated EJ component has a systematic process for assessing and scoring self-designating EJ communities.
- Reporting: Comprehensive and well-organized reports provide information on call center metrics, technical assistance, newsletters, and use of the ILSFA website.
- Quality Assurance: An Onsite Inspection Checklist provides a comprehensive form to systematically collect important information on the installation quality and the AV performance.

There are some key areas for improvement.

- Outreach did not connect with key stakeholder groups. More proactive engagement with energy efficiency providers and job training organizations would be beneficial.
- Program materials are complex, and the AV manual does not provide a clear process for AV registration and project submission steps and requirements.
- The ILSFA website is not well-organized and information can be difficult to locate.
- The portal could be improved to be more user-friendly and informative, and to simplify the project submission process.

- Grassroots Education was not held in 77 percent of IL counties (these counties without GE events represented 41 percent of ILSFA-eligible households), and there are very large regions in the western and southern parts of the state where no Grassroots Education activities have been held.
- Reports on key program progress have not been delivered while awaiting approval for report content and formatting. While Elevate has delivered other reports, they had not delivered reports on some of the key performance metrics. The quarterly report format was recently approved by the IPA and the ICC and a draft is currently under review by the IPA.

Recommendations

Recommendations from the initial Phase II Evaluation are summarized below.

Design and Management Recommendations

- *Program Management:* Elevate staff members focus on meeting implementation deadlines. There can be a lack of proactive planning, and there does not appear to be enough of a strategic management approach. Elevate should designate individuals who are focused on addressing identified barriers, more efficiently implementing Elevate-identified program improvements, planning the next stages of program implementation, and implementing several of the important improvements that were identified in the Phase I Evaluation and in this evaluation report. They may want to consider hiring external consultants to revamp the website and to improve the usability and features of the portal.
- *DG Requirements and Support:* Consider changes to DG requirements and increased support to DG vendors to develop participation in small DG projects.
 - *DG Vendors:* Reach out to AVs to assess what support is needed to develop participation in smaller DG projects.
 - *Batches:* Allow for smaller project size batches to be submitted so that as many as ten projects do not have to be included for a DG batch to be eligible.¹⁹
 - *Site Suitability:* Assess whether coordination with energy efficiency or other programs can address mitigation requirements that have been identified.
- *DG Redesign:* If participation in small DG projects continues to fall well short of expectations, consider a complete redesign of this sub-program where an implementation contractor is hired to recruit participants and install PV systems in the homes of low-income households.²⁰ This could have the following advantages.

¹⁹ This is addressed in the Revised Long-Term Plan.

²⁰ This would require revisions to the Long-Term Plan.

- *Economies of Scale*: The financials are difficult for AVs developing small DG projects that each individually have more paperwork requirements than one large CS project. Having one contractor implement part or all of the DG sub-program could help to develop the economies of scale that are not present for vendors submitting small batches of projects.
- *Participant Diversity*: This method would allow the program to design targeting and participation criteria that increase the diversity of participants.
- *Coordination*: The program could direct and support the contractor to coordinate with energy efficiency programs.
- *Vendor Development*: The program could direct the contractor to work with a certain number of small and MWBE installation companies to help develop the market for low-income solar across the state of IL.
- *Minority Firm Support*: Support participation by MWBE vendors.
 - *Outreach*: Conduct additional outreach to the four AVs that are MWBEs. Assess why they have not submitted projects or why their projects have not been selected. Determine what additional support is needed.
 - *Partnerships*: Provide opportunities for the MWBEs to meet with AVs that have had selected projects to potentially facilitate a partnership process.
 - *Certification*: Determine if there are provisions available to remove barriers to the process for solar companies seeking such certification.
- *Project Selection*: Consider a revised project selection process to provide more diversity in vendors and projects.²¹ This may include some of the following components.
 - *Vendor Diversity*: Award points for vendor diversity as is done with diversity of other project characteristics (project size, utility territory, etc.) to increase the number of different vendors that have selected projects. This will have a greater impact on the development of a low-income solar market in IL.
 - *Small Businesses*: Award points for small Illinois businesses to assist with the development of new solar vendors in the state.
 - *Minority Vendors*: Award points for vendors located in minority communities.
 - *Geographic Diversity*: Provide points for more granular geographic diversity than only the one division by utilities separated into two groups.
 - *Urbanity*: Provide points for projects in urban areas.

²¹ The Revised Long-Term Plan includes changes to the project selection process.

- *Project Size*: Increase the scoring advantage for smaller projects, especially those in the CS sub-program.
- *Utility Diversity*: Award points for projects in the territories of municipal utilities and rural electric cooperatives.

Program Implementation Recommendations

- *Outreach*: Expand outreach to a more diverse group of stakeholders and work proactively to develop linkages with low-income communities, energy efficiency programs, and job training organizations.

Community Action Agencies and other organizations that provide assistance with utility bills and weatherization are key resources for outreach and collaboration. Other organizations that are key targets include the following.

- State government offices, such as the Illinois Department of Commerce, which runs low-income energy assistance and weatherization programs.
 - City government offices (e.g. City of Champaign), targeting local employees who lead low-income energy assistance or housing programs for their cities.
 - State-level organizations with many community participants, such as Habitat Illinois, Illinois Association of Community Action Agencies, Housing Action Illinois, etc.
 - State-level organizations that serve targeted audiences, such as low-income individuals, people of color, people of faith, etc.
- *ILSFA Website*: The ILSFA website is the most common source of information for the ILSFA Program and it is critical that this resource is improved for easier navigation and access to important information. This should be a priority for Elevate Energy going forward.
 - *Program Materials*: Simplify program materials and ensure that consumer-facing materials are at an appropriate reading level. Create a list of key steps and requirements for the vendor registration process and the project submission process.
 - *Grassroots Education*: Expand Grassroots Education to cover more of the state.
 - *Vendor Training*: Introduce an AV training session on interconnection in collaboration with the utilities.
 - *Vendor Portal*: Conduct extensive planning and development to improve the initial project application stage, prevent similar issues with later stages of project application, and ensure a smoother AV application process going forward.

- *Income Verification:* Consider moving the income verification process from the AVs to Elevate or to a non-profit organization.

I. Introduction

This report presents the findings from the initial Phase II Evaluation of the Illinois Solar for All (ILSFA) Program. The ILSFA Program was mandated by the state's Public Act 99-0906, colloquially known as the Future Energy Jobs Act (FEJA), which was enacted on December 7, 2016 and went into effect on June 1, 2017. The ILSFA Program provides more generous Renewable Energy Credit (REC) contracts than those offered through the Illinois Adjustable Block Program (ABP) to overcome barriers faced by the low-income community to participation in the solar market.

The Illinois Power Agency (IPA) contracted with APPRISE, and its subcontractor Aeffect, Inc., to conduct an evaluation of the ILSFA Program. This evaluation report presents results from the initial Phase II Evaluation, which was conducted from October 2019 through January 2020. Future evaluation research will include more detailed review of program implementation, barriers, accomplishments, and results as the program implementation progresses.

A. ILSFA Program Overview

FEJA required the development of the ILSFA Program to bring photovoltaics to low-income communities in Illinois. The objectives of the program are to maximize the development of new photovoltaic generating facilities, create a long-term, low-income solar marketplace throughout the State, integrate with existing energy efficiency initiatives, and minimize administrative costs.

FEJA mandated the creation of the ILSFA Program to include four sub-programs and indicated the funding percentages from the IPA Renewable Energy Resources Fund (RERF) for each of the four sub-programs.

1. *Low-Income Distributed Generation (DG)*: This sub-program provides funding for photovoltaic projects located on individual homes and multi-family buildings. Benefits to participants are achieved through net metering or reduction of energy costs.
2. *Low-Income Community Solar (CS)*: These projects provide the opportunity for participants to subscribe to a share of a CS system and receive credits on their utility bill for the energy produced by their share of the system. The projects must identify partnerships with community stakeholders where the project will be located.
3. *Incentives for Non-Profits and Public Facilities (NP/PF)*: NP/PF may receive incentives for on-site photovoltaic generation. These projects must serve the energy loads of NP/PF customers, be installed on facilities within low-income or Environmental Justice (EJ) communities within IL, and either have a sufficient connection to and input from the low-income or EJ community or be a qualified critical service provider, defined as a non-profit or public sector entity that offers essential services to low-income or EJ communities.

4. *Low-Income Community Solar Pilot Projects*: This sub-program is based on a competitive procurement approach for CS projects, based only on the price for 15 years of delivery of all RECs. Payments will be made over the first ten years of the contract.

FEJA also allows stakeholders to propose alternative sub-programs to be approved by the IPA if they more effectively maximize the benefits to low-income customers.

Some of the key characteristics of the ILSFA Program are as follows.

- An emphasis on EJ communities and a requirement that 25 percent of the incentives for the first three ILSFA Program sub-programs are allocated within those communities.
- Requirements for community partnerships.
- Requirements for job training opportunities and hiring job trainees.
- Extensive consumer protections to ensure that consumers receive the benefits of the ILSFA Program.

B. ILSFA Evaluation

FEJA requires an independent evaluation of the ILSFA Program with objective criteria developed through a public stakeholder process. FEJA calls for an evaluation at least every two years. The evaluation is required to review the program and the third-party program administrator.

The Phase I Evaluation provided initial feedback and recommendations to the IPA for use in updating the Long-Term Renewable Resources Procurement Plan (Long-Term Plan) in Fall 2019 (to be implemented, following approval by the Illinois Commerce Commission (ICC), beginning in early 2020). This research focused on the stakeholder outreach process, development of program materials and guidelines, initial Approved Vendor (AV) registration, initial project application, and the development of Grassroots Education. The final Phase I Evaluation report was published on the ILSFA website in October 2019.

The Phase II Evaluation includes more detailed assessment of the ILSFA Program's implementation and results, including metrics required by FEJA and additional priorities identified in the Long-Term Plan. Key components of the Phase II Evaluation are as follows.

- Key metrics required by FEJA, including installations, capacity, costs, jobs created, and non-energy impacts.
- Jobs and job opportunities.
- Economic, social, and environmental benefits.
- Additional performance metrics including incentive dollars awarded, total expected cost per kWh produced, housing issues that prevent DG installations, AV satisfaction, and average savings by business model types.
- An overall program administrator assessment.

Because the ILSFA Program was only recently implemented, data for many of these metrics are not yet available, and will be presented in later rounds of the evaluation.

C. Report Overview

Six sections follow this introduction.

- Section II – Illinois Solar for All Design and Implementation: Provides a review of the design of the ILSFA Program and the implementation experience.
- Section III – Eligibility Assessment: Provides a profile of households that are eligible for the ILSFA Program using American Community Survey Data.
- Section IV – Approved Vendor Feedback: Provides findings and recommendations on the Approved Vendor characteristics and experience based on review of Approved Vendor registration applications and in-depth telephone interviews with 22 of the Approved Vendors.
- Section V – Stakeholder Outreach Design and Feedback: Provides findings and recommendations from the Stakeholder Evaluation Workshop and interviews with participating and nonparticipating stakeholders. Findings in this section are based on feedback received at the Evaluation Workshop, review of ILSFA Program materials available on the ILSFA Program website, interviews with 11 ILSFA Program stakeholders who participated in the stakeholder feedback process, and interviews with seven ILSFA Program stakeholders who did not participate in the process.
- Section VI – Program Administrator Assessment: Provides an assessment of Elevate Energy’s performance to date. Findings in this section are based upon review of publicly available material on the ILSFA website, additional program information and data provided by Elevate, interviews with the IPA and Elevate, interviews with Approved Vendors, and interviews with participating and nonparticipating stakeholders.
- Section VII – Findings and Recommendations: This section provides initial findings and recommendations based on all of the research presented in this report.

APPRISE prepared this report under contract to the IPA. The IPA and Elevate Energy facilitated this research by furnishing data and information to APPRISE. Any errors or omissions in this report are the responsibility of APPRISE. Further, the statements, findings, conclusions, and recommendations are solely those of analysts from APPRISE and do not necessarily reflect the views of the IPA.

II. Illinois Solar for All Design and Implementation

This section provides background on the design and implementation of the ILSFA Program.

A. *Future Energy Jobs Act*

FEJA mandated the creation of the ILSFA Program to include four sub-programs and indicated the funding percentages from the IPA Renewable Energy Resources Fund for each of the four sub-programs.

- Low-Income Distributed Generation
- Low-Income Community Solar
- Non-Profits and Public Facilities
- Low-Income Community Solar Pilot Projects

Other specific requirements of FEJA were as follows.

Economic Benefits

- Tangible economic benefits must flow directly to program participants except in multi-family housing where the low-income customer does not pay directly for energy.
- Low-Income CS Pilot projects must provide economic benefits for members of the community where the project is located and include a partnership with at least one Community Based Organization (CBO).

Community Partnerships

- Priority should be given to projects that demonstrate meaningful involvement of low-income community members.
- Low-Income CS developers must identify partnerships with community stakeholders.
- The IPA should ensure collaboration with community agencies and allocate up to five percent of the funds available under the ILSFA Program to community-based groups to assist in Grassroots Education.

Environmental Justice

- At least 25 percent of the incentives for DG, CS, and NP/PF projects must be allocated within EJ communities.

Income Eligibility

- Low-income households are persons and families whose income does not exceed 80 percent of the area median income, adjusted for family size and revised every five years.

Job Training

- DG projects must include job training opportunities if available and should coordinate with job training programs.

Administration

- Low-Income CS Pilot Projects must be competitively bid by the IPA.
- The IPA should select a third-party program administrator through a competitively bid process.

Incentives

- The IPA (or a utility) will purchase RECs from generation for the first 15 years of operation as an upfront payment per installed kilowatt of nameplate capacity, paid when the device is interconnected at the distribution system level of the utility and is energized.

Evaluation

- The IPA should select an independent evaluator to review and report on the ILSFA Program and the performance of the third-party administrator at least every two years. The evaluation should be based on objective criteria developed through a public stakeholder process. The report should include the following metrics.
 - Total installed capacity in kilowatts.
 - Average cost per kilowatt of installed capacity.
 - Number of jobs or job opportunities created.
 - Economic, social, and environmental benefits created.
 - Total administrative costs expended by the IPA and the program administrator to implement and evaluate the program.

The IPA was directed to develop a Long-Term Plan with a proposed approach to the design, implementation, and evaluation of the ILSFA Program. FEJA specified that the following would be included in this Long-Term Plan.

- Program terms, conditions, and requirements.
- Prices to be paid for RECs.
- The level of energy and economic benefits to be accrued by low-income customers.
- A definition of EJ community that is compatible with other agencies' definitions.

B. Long-Term Renewable Resources Procurement Plan

The IPA published a Draft Long-Term Plan on September 29, 2017 and stakeholders were provided with 45 days to provide written comments. The IPA answered questions, provided presentations on the Long-Term Plan, received public comments, and revised the Long-Term Plan. The Long-Term Plan was filed at the ICC for review and approval on December 4, 2017 and was approved by the Illinois Commerce Commission (ICC) on April 3, 2018.

In 2019, the IPA undertook the Long-Term Plan update process which involved the following steps.

- Workshops were held in June 2019 to discuss the Long-Term Plan update.
- A Request for Comments on the Long-Term Plan workshops was posted in early July 2019.
- Responses to the Request for Comments on the Long-Term Plan workshops were posted in late July 2019.
- The Draft Revised Long-Term Plan was released on August 15, 2019.

- Public hearings on the Draft Revised Long-Term Plan were held in early September.
- Written comments on the Draft Revised Long-Term Plan were accepted until September 30, 2019.
- Comments on the Draft Revised Long-Term Plan were posted in early October 2019.
- The IPA filed the Revised Long-Term Plan with the ICC on October 21, 2019.
- The ICC approved the Revised Long-Term Plan with some changes on February 18, 2020.
- The IPA is now working with the Program Administrator to implement the program changes contained in the Revised Long-Term Plan (as approved by the ICC).

The Long-Term Plan provided more detail on the requirements for the ILSFA Program.

- **Economic Benefits:** Economic benefits for participants will be accrued through net metering or avoided consumption from the energy the system produces. The IPA developed the following requirements to ensure that benefits flow to low-income participants.
 - Eligible low-income residential participants should not pay up-front costs for the DG installation or pay an up-front fee to subscribe to a CS project.
 - Participation should result in immediate, reliable reductions in energy costs for residents or subscribers.
 - Any ongoing annual payments (for financed or leased projects) must be less than 50 percent of the annual first year estimated production and/or utility default service net metering value to be received by the customer.
 - While incentives must flow through to the intended recipients, the incentives will not be customized to each participant's specific economic circumstances. The evaluation will review the impact on participants' energy burden and that information will be used to inform any future modifications to incentive levels. The IPA and the program administrator will educate AVs about utility programs, weatherization assistance programs, and other alternative sources of funding.
- **Net Metering:** Projects are required to participate in the utility's or Alternative Retail Electric Suppliers' (ARES) net metering program. This may prevent projects in the service territory of a municipal utility or rural electric cooperative that does not offer net metering from participating.
- **Project Viability:** Roof repairs or wiring upgrades may be needed to implement the solar installations. The ILSFA Program will not provide funding for those upgrades.
- **Capacity Factor:** The Long-Term Plan describes the options for the capacity factor used in the ABP to convert kilowatt size of a project to the number of RECs the system would be expected to generate over 15 years.
 - **Standard Capacity Factor:** For each kW of capacity, approximately 21 RECs would be generated over 15 years for a fixed-mount system and 25 RECs would be generated over 15 years for a tracking system.

- Alternative Capacity Factor: AVs have the option of proposing an alternative capacity factor based on an analysis using PV Watts or an equivalent tool.
- REC Payments
 - The price will be expressed on a dollar per REC basis.
 - Payments will be based on the 15-year expected REC production of the system.
 - A system must be registered in GATS or M-RETS to verify it will produce RECs.
- Contracts
 - Contracts will be with the IPA if the funding source is the Renewable Energy Resources Fund (RERF) and with the utility if the funding source is the utility.
 - Contracts will be applied to the annual Renewable Portfolio Standard (RPS) goals of the utility to which the project is interconnected, but will not count toward each utility's new photovoltaic targets.
 - RECs from projects in the service territories of municipal utilities, rural electric cooperatives, or Mt. Carmel Public Utility would not be applied to the utility RPS goals if they are procured through contracts with the IPA. Any RECs procured through contracts with a utility would be applied to the RPS goals of the contracting utility.
 - Projects that receive a contract through the ILSFA Program cannot receive one through the ABP.

C. Resources

The ILSFA Program is funded through three sources.

- The Renewable Energy Resources Fund (RERF): This fund was created as a special fund in the State Treasury and is administered by the IPA for the procurement of renewable energy resources. The RERF was created with Alternative Compliance Payments remitted by ARES to comply with the State's RPS established by the Public Utilities Act.

The IPA plans to allocate up to \$20 million per year from the RERF for the ILSFA Program. RERF funding for the DG, CS, and NP/PF sub-programs will be available for seven to eight years if fully spent each year.

- Utility Funding: A portion of the funds collected by the utilities under their Renewable Portfolio Standard (RPS) tariffs. Utilities will add an additional \$10 million in funding in 2018-2019, and \$11.7 million in funding per year in 2019-2020 and 2020-2021. The utility funding is not required to be applied in the same percentages as the RERF funds, but will be used to supplement the sub-programs that have used up their available funds from the RERF (but not provide funding from the Low-Income CS Pilot Projects sub-program). The IPA proposed in the Long-Term Plan that the utility funding would be allocated to the three non-competitive sub-programs with the same relative weighting as the RERF funding.

- **Additional Utility Funding:** Additional funds from the utilities’ renewable resources budgets were potentially available for program funding, however, the triggering “funding shortfall” conditions have not been met.

Table II-1 provides a summary of the funding available for the ILSFA Program.

**Table II-1
Funding for Components of Illinois Solar for All**

Program Component	% of RERF Funds	Funding Sufficiency (Years)	2018-2019 Funding (\$Millions)	
			RERF	Utility
Low-Income Distributed Generation	22.5%	7-8 Years	\$4.5	\$3.0
Low-Income Community Solar	37.5%	7-8 Years	\$7.5	\$5.0
Incentives for Non-Profits & Public Facilities	15%	7-8 Years	\$3.0	\$2.0
Low-Income Community Solar Pilot Projects	25% (\$50 Million CAP)	To Be Determined	\$5.0	\$0.0

The funding allocations are to support the following.

- REC Payments.
- Program Administration
- Grassroots Education
- Evaluation

D. ILSFA Sub-Programs

There are four sub-programs within the Illinois Solar for all Program.

1. *Low-Income Distributed Generation (DG):* This sub-program provides funding for photovoltaic projects located on individual homes and multi-family buildings. Benefits to participants are achieved through net metering or reduction of energy costs. Residents of master-metered buildings do not receive the direct benefits of the solar installation because they do not pay for their electric bill. In such a case, the building owner/manager must commit to passing along at least 50 percent of the energy savings from net metering to tenants through reduced rents or by other means.
2. *Low-Income Community Solar (CS):* These projects provide the opportunity for participants to subscribe to a share of a CS system and receive credits on their utility bill for the energy produced by their share of the system. The projects must identify partnerships with community stakeholders where the project will be located. The AV must identify those partnerships in the project application, and provide a description of how the partnership shows that it is responsive to the priorities and concerns of low-income members of the community. Incentives for these projects are for the portion of the project that is subscribed by low-income subscribers. However, if the anchor tenant is a non-profit or a public sector entity, the incentive will not be reduced for the share subscribed by the anchor tenant.

3. *Incentives for Non-Profits and Public Facilities (NP/PF)*: NP/PF may receive incentives for on-site photovoltaic generation. These projects must serve the energy loads of NP/PF customers, be installed on facilities within low-income or EJ communities within IL, and either have a sufficient connection to and input from the low-income or EJ community or be a qualified critical service provider, defined as a non-profit or public sector entity that offers essential services to low-income or EJ communities. Critical service providers include youth centers, hospitals, schools, homeless shelters, senior centers, community centers, places of worship, or affordable housing providers including public housing sites.

These entities may not be able to capture the tax benefits that an ABP participant would be able to capture. Therefore, the adjusted incentive level can help overcome the financing barriers that NP/PF may face compared to private entities.

4. *Low-Income Community Solar Pilot Projects*: This sub-program is based on a competitive procurement approach, based only on the price for 15 years of delivery of all RECs. Payments will be made over the first ten years of the contract.

The other following criteria established in the Long-Term Plan are minimum criteria for eligibility to participate in the competitive procurement.

- Projects must result in economic benefits for the members of the community in which the project will be located. This requirement can be met by including partnerships with community stakeholders. Projects must provide a commitment to local hiring, describe the impact on payments to community residents or organizations as part of the development process, or offer subscriptions to community residents and organizations.
- The project must also include a partnership with at least one community-based organization, an existing non-profit organization that provides programs and services within the community where the proposed project will be located.
- The funds may not be distributed solely to a utility.
- At least some funds must include community ownership by the project subscribers.

These contracts will be with the IPA and will use RERF funding.

FEJA also allows stakeholders to propose alternative sub-programs to be approved by the IPA if they more effectively maximize the benefits to low-income customers.

E. Other ILSFA Guidelines

This section provides a brief description of additional ILSFA guidelines and requirements. More details for the DG, CS, and NP/PF sub-programs are provided in the Phase I Evaluation Report.

Income Eligibility

The ILSFA uses income eligibility guidelines from HUD which bases its housing assistance programs on 80 percent of area median income (AMI) adjusted for family size. Because the

income guidelines for LIHEAP and IHWAP are lower than these guidelines, all LIHEAP-eligible and IHWAP-eligible (state funded) households are eligible for the ILSFA Program.

Qualified Census Tracts (QCTs) have 50 percent of households with incomes below 60 percent of the Area Median Gross Income or have a poverty rate of 25 percent or more. QCTs are used as a streamlined method for determining eligibility for Low-Income CS customers.

Consumer Protections

The ILSFA Program has developed extensive procedures to ensure that consumers are protected. The IPA felt that it was important to ensure these protections given the experience with ARES taking advantage of low-income customers in IL.

The key financial protections with respect to the DG and CS sub-programs include no upfront customer payments, ongoing costs and fees paid by the participant must not exceed 50 percent of the value of energy generated by the system or by the participant's share of the system, loans must not be secured by the program participant's home or home equity, financing terms must be based on an assessment of the participant's ability to repay the debt, and contracts for loans must offer terms that include forbearance.

AVs must also ensure that marketing materials are accurate and do not contain misleading statements.

Environmental Justice Communities

EJ communities are defined as having a higher risk of exposure to pollution based on environmental and socioeconomic factors. FEJA requires that 25 percent of the funds in the following sub-programs be allocated to projects located in EJ communities.

- Low-Income Distributed Generation
- Non-Profit and Public Facilities
- Low-Income Community Solar Projects

The IPA worked with Elevate Energy to develop a systematic evaluation and scoring system using the EJ Screen tool developed by the US EPA and the CalEnviroScreen tool developed by the California Office of Environmental Health Hazard Assessment as guidance.²² Communities with scores in the top 25 percent were defined as EJ communities. Communities that were not in the top 25 percent of scores and thus not initially defined as being an EJ community may request consideration to be self-designated.

The EJ community self-designation is an ongoing process with periodic review and approval by the EJ review committee. Elevate Energy worked with the IPA to determine the make-up of the EJ review committee. The committee was designed to have representatives from the administrative team, individuals from the community with environmental justice backgrounds, and a balance of downstate and Chicago area representation. The committee

²² This was based on methodology described in the Long-Term Plan.

includes two IPA staff members, two Elevate Energy staff members, a representative from the IL EPA, and two representatives from community organizations.

Sixteen EJ self-designation applications were received and assessed between May 2019 and November 2019. Of those 16 applications (four of which were resubmissions), four were approved. These were DePue, Ford Heights, South Peoria, and Winnebago.

Approved Vendor Requirements and Registration

There are four different types of AVs that can develop projects for the ILSFA Program – Approved Vendors, Aggregator Approved Vendors, Aggregator Designees, and Single Project Approve Vendors. All AV types, except for the Aggregator Designees, must register and maintain their status as an AV in the ABP to participate in ILSFA Program.

AVs who participate in the ABP must meet additional requirements to participate in the ILSFA Program, and must register to participate in the program. Requirements include community involvement, job training, hiring job trainees, income verification, marketing, and consumer protections.

Incentives

ILSFA incentives are REC prices that are adjusted from the ABP and are based on system size, building size, and geography. CS Pilot incentives are based on the competitive bid price.

Site Suitability Guidelines

The ILSFA Program has site suitability guidelines that identify the site conditions that are considered to be barriers to the installation of rooftop DG and ground-mounted photovoltaic systems.²³ These conditions relate to roofing, structural issues, electrical condition, space and accessibility, health and safety, and ground-mounted systems.

Interconnection Requirements

Illinois utilities have different requirements for interconnection agreements. The ILSFA requires that projects submitted for approval to the ILSFA Program with a nameplate capacity of above 25 AC kW are required to have a valid, signed interconnection agreement at submission. A limited exception will be made under certain conditions regarding previous agreement and new application outlined in the guidelines.

Project Selection

ILSFA projects are selected from projects submitted in batches by AVs.

1. The initial assessment reviews that the projects meet the requirements for community engagement, participant benefit and protections, job trainees, site eligibility, and interconnection.
2. Projects are sorted by sub-program and then by priority grouping (EJ community, low-income community, and project diversity) for scoring.

²³ ILSFA Site Suitability Guidelines dated 5/7/2019. Available on the ILSFA Program website.

3. Projects are scored based upon location in EJ and LI communities, MWBE AVs, participant savings, subscriber ownership for CS, NP or PF ownership for CS, and to provide diversity by utility groups, number of units, system size, and non-profits and public facilities.

Quality Assurance

The ILSFA quality assurance process will include photo documentation of all projects while under construction and on-site inspection of a random sample of installations. The AV will be responsible for remedying any deficiencies that are found, and AVs that have a disproportionately high number of deficient systems may lose eligibility to continue to participate in the ILSFA Program.

F. Low-Income Community Solar Pilot Program

Low-Income Community Solar Pilot Projects (CS Pilot) are community-based photovoltaic generation projects that provide benefits to low-income subscribers through net metering and monthly bill credits.

Unlike the other three sub-programs, the incentives for CS Pilot are determined through a competitive bidding process. The procurement for Low-Income Community Solar Pilot Projects is bid on a \$/REC basis. Contracts are for 15 years of delivery of all RECs from the project to the IPA once the project is energized. Payments will be made on a quarterly basis for the first 10 years of REC delivery. In year ten, a lump sum payment will be made for the final 5 years of REC delivery.

The CS Pilot procurement process is conducted by NERA Economic Consulting, the Procurement Administrator selected by the IPA. NERA is responsible for handling the intake of all CS Pilot Project Proposals, evaluating each Proposal, and recommending Proposals for approval by the ICC. Additionally, Bates White, LLC, the Procurement Monitor appointed by the ICC, observes the entire procurement process and reports on the progress and fairness of the proceedings to the Commission.

CS Pilot Requirements

Key requirements for the CS pilots are summarized below.

- **Project Location:** Projects must be entirely located in the State of Illinois.
- **Interconnection:** Projects must be powered by photovoltaics and be interconnected at the distribution system level of an electric utility, a municipal utility, a public utility, or an electric cooperative.
- **Timing:** Timing requirements are specified as follows
 - The date of final interconnection cannot have occurred before June 1, 2017.
 - Projects must be energized within 18 months of contract execution (there are clauses for extensions).

- At least one REC is expected to be delivered within 90 days of energization of the Project.
- The REC Contract provides for 180 months of REC delivery starting on the first day of the month when the first REC is delivered.
- Funding: Total funding for the CS Pilots cannot exceed \$50 million, and funding per project cannot exceed \$20 million.
- Project Size: CS Pilots may exceed the 2,000 kW limit that otherwise applies for other ILSFA sub-programs. The actual nameplate capacity upon energization must be within the greater of +/- 5 kW or +/- 25 percent of the proposed nameplate capacity.
- Contract Value: The maximum contract value under the REC contract is defined as follows.
 - Purchase Price * Proposed Nameplate Capacity * Standard Capacity Factor * 100% Subscription Rate * 8,760 hours x 15 years
 - The annual contract value is the maximum contract value divided by 15 years.
- Updating the Contract Value: At the end of the first four full quarterly periods after energization, the Seller must provide the IPA a “First Year Report” with information on RECs delivered and subscription rates during those first four quarters. The highest average subscription rate for any of the first four quarterly periods (or 50 percent if greater) will be used to update the maximum contract value and the annual contract value. These values will be used for the remainder of the Contract.
- Ownership: Funds for CS Pilots may not be distributed solely to a utility, and at least some of the funds must include a project partnership that includes community ownership by the project subscribers. If the project is not at least 50 percent owned by subscribers at the time of application, the bidder must provide information on outreach and engagement efforts, marketing materials, and a description of the type of subscribers that are expected.
- Partnerships: Projects must include a partnership with at least one CBO. The initial qualification form must include CBO information including the programs and services offered and the area in which the CBO operates. The form must also include a summary of the partnership agreement, a description of the CBO’s role in the project and its development, and a statement of support.
- Community Outreach: The initial qualification must include information on at least two community outreach events, including the date, content of discussion, and number of participants.
- Marketing: All project developers associated with the development, installation, operations, and subscription of the Project must abide by the Community Solar Marketing Guidelines published by the IPA for the ILSFA Program.

- **Energy Efficiency:** The Seller must provide an Energy Efficiency Resource Guide, generated by the IPA, with information about energy efficiency opportunities to all subscribers and participants.
- **Benefits:** Projects must provide benefits to low-income subscribers via net metering credits calculated in accordance with the ILSFA Vendor Manual.
 - CS Pilots must result in economic benefits for the members of the community in which the project will be located.
 - Any ongoing first-year payments for participation in the Project by a Subscriber may not exceed 50 percent of the expected first-year net metering value to be received by the Subscriber for the same period.
 - Any ongoing participation payments over the entire term of a subscription agreement may not exceed 50 percent of the expected total net metering value over that same term.
 - If the Project is located in the service territory of a municipal utility or rural cooperative, they must certify that they will offer net metering for community solar comparable to what is required for investor-owned utilities.
- **Subscribers:** Subscribers must be low-income residential customers or a CBO that provides programs and services within the community where the projects will be located.
 - No single subscriber may constitute more than 40 percent of the Project's nameplate capacity.
 - The portion of the Project subscribed by community-based organizations in aggregate may not exceed 40% of the facility's actual nameplate capacity.
 - A list of subscribers, along with address, interest (in kW) in the Project, and percentage of the Project subscribed must be provided on a yearly basis.
- **Workforce Development:** Bidders are required to provide the following information.
 - A non-discriminatory hiring plan that is expected to result in engaging job trainees or workers residing within the community.
 - A summary of efforts to date to engage job trainees or workers residing within the community.
 - Any commitments made or that the Bidder intends to make to provide opportunities to minority business enterprises or women business enterprises.
 - A list of job trainees and workers residing in the Community and the hours that each individual worked on the Project.
- **Financing:** If the project has not already begun operation, the bidder must provide a description of how the project will be financed and letters of intent from lenders or equity partners to cover 30 percent of the financing.
- **Tracking and Reporting:** Sellers must use PJM GATS or M-RETS for tracking RECs. For all delivery years following the first year report, the Seller must provide a REC

Annual Report by July 15 following the end of each delivery year with information related to the developmental progress of the Project or REC deliveries and subscription information during the delivery year that concluded.

Competitive Procurement Process

The CS Pilot procurement process consists of two parts. The first part is a response to the program's qualification standards, and the second part is the bid and financial support for the bid.

Bidders are required to submit bid assurance collateral in the form of a Letter of Credit sent directly to the IPA. The bid assurance collateral that is required is equal to \$15,000 times the aggregate size of the Bidder's Projects (AC rating), rounded to the nearest MW.

Bid evaluation first eliminates the bids that fail to meet or exceed the project requirements. Bids are then ranked in order of price per REC. Generally, the lowest-priced Projects will be selected. Within two business days of the Bid Date, the Procurement Administrator and Procurement Monitor will submit to the Commission separate confidential reports that will provide the results of the procurement event. The Commission will decide whether to accept or reject the results of the procurement event within two business days of receiving the confidential reports.

If the ICC approves the results of the procurement event, each Seller with an approved Project will execute the REC Contract with the IPA. Winning Bidders must pay a Supplier Fee per REC that reflects the cost of conducting the procurement event less the total of the Bid Participation Fees. The exact amount of the Supplier Fee per REC will be announced no later than two business days before the Bid Date.

If the ICC rejects the results of a procurement event, the Procurement Administrator, the Procurement Monitor, and ICC Staff will meet within ten days of the decision to analyze potential causes for failure to meet the requirements. The Procurement Administrator may implement changes and hold an additional procurement event if such changes would address the concerns that caused the Commission to reject the results of the procurement event.

CS Pilot Implementation

The CS Pilots were implemented in fall 2019 according to the following schedule.

- 10/23/19: Final RFP Documents Posted
- 10/24/19 – 11/6/19: Part 1 Submission Window
- 11/20/19 – 12/4/19: Part 2 Submission Window
- 12/13/19: Bid Date
- 12/19/19: ICC Decision on Procurement Event Results
- 12/24/19: REC Contracts Fully Executed

Information on the results of the first CS Pilot bidding process were released on December 19, 2019 at the time of Commission approval of the procurement event.

- Average Winning Price (\$/REC): \$72.02
- Winning Suppliers
 - Community Power Group, LLC
 - BQ Energy Development, LLC

Because there were not at least three successful suppliers, the number of RECs awarded was not made public.

G. DG, CS, and NP/PF Vendor and Program Implementation Statistics

This section provides data and information on the implementation of the ILSFA Program. The information in this section is based on publicly available information on the ILSFA Program website, interviews with the IPA and Elevate Energy managers and staff, and data from the ILSFA Program Database.

Key dates in the implementation of the ILSFA Program are provided in Table II-2.

**Table II-2
Key ILSFA Program Implementation Dates**

Date	Milestone
12/7/2016	Future Energy Jobs Act Legislation Enacted
6/1/2017	Future Energy Jobs Act Effective Date
9/29/2017	Draft Long-Term Renewable Resources Procurement Plan Published
12/4/2017	Long-Term Renewable Resources Procurement Plan Filed with Illinois Commerce Commission
4/3/2018	Long-Term Renewable Resources Procurement Plan Approved by Illinois Commerce Commission
9/14/2018	ILSFA Program Administrator, Elevate Energy, Selected
11/1/2018	ILSFA Website Launch
1/17/2019	Environmental Justice Communities List Published
2/19/2019	Approved Vendor Registration Launched
5/6/2019	Environmental Justice Community Self-Designation Application Opened
5/15/2019	Approved Vendor Portal Opened for Project Submissions, Standard REC Contract Published
6/13/2019	Low-Income Community Solar Submission Window Closed
6/27/2019	Grassroots Educators Announced
6/28/2019	Low-Income Distributed Generation and Non-Profit / Public Facilities Submission Window Closed
8/7/2019	ILSFA Program Evaluator, APPRISE, Selected
8/15/2019	Draft Revised Long-Term Renewable Resources Procurement Plan Released for Public Comment
8/22/2019	Non-Profit / Public Facilities Projects Selected for 2018/2019
8/29/2019	Low-Income Community Solar Projects Selected for 2018/2019
9/4/2019	2019/2020 Project Submission Window Opened
9/17/2019	2019/2020 Project Submission Window Closed

Date	Milestone
10/2/2019	Illinois Commerce Commission Approved 2018/2019 Project Selections
10/21/2019	Revised Long-Term Renewable Resources Procurement Plan Filed for Illinois Commerce Commission Approval
11/7/2019	2019/2020 Final Project Selections Announcement

Vendor Registration

Analyses provided below are based on data on vendor registrations in the ILSFA Program database as of December 2019.

Table II-3 displays the status of the AVs. Thirty-two vendors had been approved (up from 27 approved as of September 2019), five were under review, one was withdrawn, and one was rejected (because it was incomplete).

**Table II-3
Approved Vendor Registration Status**

Status	Vendors	
	#	%
Approved	32	82%
Under Review	5	13%
Withdrawn	1	3%
Rejected	1	3%
Total	39	100%

Table II-4 displays the number of AVs that were qualified as Minority or Women-Owned Businesses (MWBEs). Approved Vendors are considered to be MWBEs if they are registered with public or non-public third-party certifying bodies approved by ComEd and Ameren Illinois, including but not limited to, the National Minority Supplier Development Council and its regional affiliates, and the Women's Business Enterprise National Council and its regional affiliates.

While in September 2019, three of the 27 AVs were qualified as MWBEs, as of December 2019, four of the 32 Approved Vendors were qualified as MWBEs. One additional MWBE vendor was under review.

**Table II-4
Approved Vendors Minority or Women-Owned Status**

Minority or Women Owned	Vendors									
	Approved		Withdrawn		Rejected		Under Review		Total	
	#	%	#	%	#	%	#	%	#	%
MWBE	4	13%	0	0%	1	100%	1	20%	6	15%
Not MWBE	27	84%	1	100%	0	0%	2	40%	30	77%
Missing	1	3%	0	0%	0	0%	2	40%	3	8%
Total	32	100%	1	100%	1	100%	5	100%	39	100%

Table II-5 displays the types of projects that the AVs stated they would provide in their registrations. Of the Approved Vendors, 26 stated that they would do NP/PF projects, 22 said they would do CS projects, and 15 said they would do 1-4 unit DG projects, and 17 said they would do multi-family DG projects. AVs are not held to these statements, and it is not clear how many of the AVs will actually engage in the DG sub-program. Elevate is continuing to work with AVs to better document the intended types of projects.

**Table II-5
Approved Vendor Project Types**

Project Types	Vendors									
	Approved		Withdrawn		Rejected		Under Review		Total	
	#	%	#	%	#	%	#	%	#	%
Non-Profit/Public Facilities	26	81%	1	100%	1	100%	5	100%	33	85%
Community Solar	22	69%	0	0%	1	100%	1	20%	24	62%
Distributed Generation: 1-4 Unit	15	47%	1	100%	1	100%	3	60%	20	51%
Distributed Generation: 5+ Unit	17	53%	1	100%	1	100%	3	60%	22	56%

Note: Vendors can pursue multiple project types.

Table II-6 displays the utility territories where the AVs stated they would work in their registration applications. While 25 planned to perform work in Ameren's territory, 27 planned to perform work in ComEd's territory, 13 in the territories of municipal utilities, 12 in the territories of rural electric cooperatives, ten in the Mid-American territory, and eight in the Mt. Carmel territory. As with the sub-programs, these are vendor-reported and require further review and confirmation with AVs.

**Table II-6
Approved Vendors by Utility Territories**

Utility Territories	Vendors									
	Approved		Withdrawn		Rejected		Under Review		Total	
	#	%	#	%	#	%	#	%	#	%
Ameren	25	78%	1	100%	1	100%	3	75%	30	79%
ComEd	27	84%	1	100%	1	100%	4	100%	33	87%
Municipal Utilities	13	41%	1	100%	0	0%	3	75%	17	45%
Rural Electric Cooperatives	12	38%	1	100%	0	0%	2	50%	15	39%
Mid-American	10	31%	1	100%	0	0%	2	50%	13	34%
Mt. Carmel	8	25%	1	100%	0	0%	2	50%	11	29%

Note: Vendors can work in multiple utility territories. One vendor that is currently under review was missing utility territory information and was excluded from this table.

Table II-7 displays the types of vendors. While 30 of the AVs are in the general AV category, one is an Aggregator Designee and one is an Aggregator. There were no Single Project AVs.

**Table II-7
Vendor Type**

Vendor Type	Vendors									
	Approved		Withdrawn		Rejected		Under Review		Total	
	#	%	#	%	#	%	#	%	#	%
Approved Vendor	30	94%	1	100%	1	100%	3	60%	35	90%
Aggregator Designee	1	3%	0	0%	0	0%	2	40%	3	8%
Aggregator	1	3%	0	0%	0	0%	0	0%	1	3%
Total	32	100%	1	100%	1	100%	5	100%	39	100%

Project Applications and Selection

This section provides information on the project applications and projects that were selected in program years 2018-2019 (October 2019 data) and 2019-2020 (December 2019 data). The 2018-2019 contracts were approved by the ICC in early October 2019.

Table II-8 displays the number of projects selected, eligible, ineligible, withdrawn, and under review by sub-program for the 2018-2019 and 2019-2020 program years. The table provides the following information.

- Non-Profit / Public Facility Projects: 63 projects were submitted, 24 were eligible, and 24 were selected across the two program years. While seven projects were selected in the first program year, 17 were selected in the second program year. All funds were not

exhausted at the end of initial selection, so the window remained open and several additional projects were submitted.

- Low-Income Community Solar Projects: 75 projects were submitted, 56 were eligible, and eight were selected across the two program years, four in each year. The volume of submitted projects significantly exceeded the amount of funding available for the sub-program. The 30 submitted projects totaled \$148.8 million in incentive value compared to \$12 million in available funding.
- Low-Income Distributed Generation Projects: 12 projects were submitted, one was eligible, and one was selected in the second program year. The DG sub-program was not fully subscribed and additional projects can be submitted through June 2020.²⁴

Table II-8
All Submitted Projects, 2018-2020
Eligibility Status

Status	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Selected	7	4	0	11	17	4	1	22	24	8	1	33
Eligible	7	28	0	35	17	28	1	46	24	56	1	81
Ineligible	10	8	0	18	2	1	1	4	12	9	1	22
Withdrawn	11	9	1	21	10	1	9	20	21	10	10	41
Under Review	0	0	0	0	6	0	0	6	6	0	0	6
Total	28	45	1	74	35	30	11	76	63	75	12	150

NOTE: 19 projects that were not selected in project year one were re-submitted in project year two.

Table II-9 displays the reasons for vendor withdrawal of projects. The most common reasons for withdrawal were issues obtaining documentation and lack of a signed interconnection agreement. Other reasons included waiting for the next program year, organizational challenges, high interconnection costs, and financial constraints.

Table II-9
All Submitted Projects
Reason for Vendor Withdrawal

Reason	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Issues Obtaining Documentation	0	0	0	0	5	0	0	5	5	0	0	5
No Signed Interconnection Agreement	4	1	0	5	0	0	0	0	4	1	0	5

²⁴ Nine additional small DG projects were submitted following the project submission window with a total capacity of 58 kW AC. These projects were approved by the ICC on March 4, 2020.

Reason	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Would Not Do One Project w/o Other	0	0	0	0	2	0	0	2	2	0	0	2
Waiting for Next Program Year	0	2	0	2	0	0	0	0	0	2	0	2
Organizational Changes at Non-Profit	0	0	0	0	2	0	0	2	2	0	0	2
High Interconnection Cost	0	2	0	2	0	0	0	0	0	2	0	2
Financial Constraints	1	1	0	2	0	0	0	0	1	1	0	2
Other	2	0	0	2	1	0	0	1	3	0	0	3
Reason Not Provided	4	3	1	8	0	1	9	10	4	4	10	18
Not Withdrawn	17	36	0	53	25	29	2	56	42	65	2	109
Total	28	45	1	74	35	30	11	76	63	75	12	150

Tables II-10A, II-10B, and II-10C display whether mitigation was required for each sub-program. (Mitigation is required when a proposed project does not meet the ILSFA's site suitability guidelines that were developed to ensure that there are no barriers to the safe installation of photovoltaic systems.) While nine of 24 selected NP/PF projects required mitigation, two of eight selected CS projects required mitigation, and the one selected DG project did not require mitigation.

Table II-10A
Non-Profit and Public Facility Projects
Mitigation Required

Mitigation	Non-Profit / Public Facility Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
Required	1	4	5	8	6	14	9	10	19
Not Required	6	17	23	9	12	21	15	29	44
Total	7	21	28	17	18	35	24	39	63

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-10B
Low-Income Community Solar Projects
Mitigation Required

Mitigation	Low-Income Community Solar Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
Required	1	9	10	1	4	5	2	13	15
Not Required	3	32	35	3	21	24	6	53	59
Missing	0	0	0	0	1	1	0	1	1
Total	4	41	45	4	26	30	8	67	75

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-10C
Low-Income Distributed Generation Projects
Mitigation Required

Mitigation	Low-Income Distributed Generation Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
Required	0	0	0	0	1	1	0	1	1
Not Required	0	1	1	1	9	10	1	10	11
Total	0	1	1	1	10	11	1	11	12

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-11A displays the number of projects submitted by AVs in each ILSFA sub-program. The vendors that submitted the most projects were Novel Energy Solutions, Central Road Energy, Community Power Group, Solar Sense, and Promethean Solar. In total, these five AVs submitted 73 projects out of the total of 150 projects that were submitted. Twenty-three different vendors submitted projects, indicating a successful AV participation rate. However, only two vendors, Certasun and SA Energy, submitted DG projects.

**Table II-11A
All Submitted Projects
Approved Vendors**

Vendor	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Novel Energy Solutions	2	11	0	13	0	5	0	5	2	16	0	18
Central Road Energy	8	1	0	9	7	1	0	8	15	2	0	17
Community Power Group	0	9	0	9	0	5	0	5	0	14	0	14
Solar Sense, Inc.	7	2	0	9	4	0	0	4	11	2	0	13
Promethean Solar	0	4	0	4	0	7	0	7	0	11	0	11
Certasun	0	0	0	0	0	0	10	10	0	0	10	10
Groundswell	1	3	0	4	5	1	0	6	6	4	0	10
Advanced Energy Solutions	6	0	0	6	2	0	0	2	8	0	0	8
Tattleaux Illinois Solar	0	0	0	0	0	6	0	6	0	6	0	6
Windfree Wind and Solar	0	0	0	0	6	0	0	6	6	0	0	6
Ameresco	0	5	0	5	0	0	0	0	0	5	0	5
PSG Energy Group	2	0	0	2	3	0	0	3	5	0	0	5
Trajectory Energy Partners	0	4	0	4	0	1	0	1	0	5	0	5
CIC Energy Consulting	0	0	0	0	3	0	0	3	3	0	0	3
Citrine Power	0	2	0	2	0	1	0	1	0	3	0	3
SA Energy	0	1	1	2	0	0	1	1	0	1	2	3
Affordable Comm. Energy	0	0	0	0	2	0	0	2	2	0	0	2
Carbon Solutions	0	0	0	0	2	0	0	2	2	0	0	2
JCD Solar	0	1	0	1	0	1	0	1	0	2	0	2
LiveWire Electrical	2	0	0	2	0	0	0	0	2	0	0	2
SunPower Corporation	0	1	0	1	0	1	0	1	0	2	0	2
WCP Solar	0	1	0	1	0	1	0	1	0	2	0	2
Centralia City School Dist.	0	0	0	0	1	0	0	1	1	0	0	1
Total	28	45	1	74	35	30	11	76	63	75	12	150

Table II-11B provides a summary of the number of projects submitted by the AVs. The table shows that AVs submitted an average of five projects across all project types. The number of submitted projects ranged from no projects to eighteen projects. Nine of the AVs did not submit any projects in either round, and seven AVs submitted ten or more projects overall.

**Table II-11B
Number of Submitted Projects**

Project Type	Number of Projects	Number of Vendors Submitting		
		PY1: 2018-2019	PY2: 2019-2020	Total
Non-Profit/Public Facility	0	25	22	20
	1-4	4	7	6
	5-8	3	3	4
	11	0	0	1
	15	0	0	1
	Total	32	32	32
	Mean # of Submitted Projects:	0.9	1.1	2.0
	Minimum # of Submitted Projects:	0.0	0.0	0.0
	Maximum # of Submitted Projects:	8.0	7.0	15.0
Community Solar	0	19	21	18
	1-4	10	7	8
	5-7	1	4	3
	9-11	2	0	1
	14-16	0	0	2
	Total	32	32	32
	Mean # of Submitted Projects:	1.4	0.9	2.3
	Minimum # of Submitted Projects:	0.0	0.0	0.0
	Maximum # of Submitted Projects:	11.0	7.0	16.0
Distributed Generation	0	31	30	30
	1-2	1	1	1
	10	0	1	1
	Total	32	32	32
	Mean # of Submitted Projects:	0.0	0.3	0.4
	Minimum # of Submitted Projects:	0.0	0.0	0.0
	Maximum # of Submitted Projects:	1.0	10.0	10.0

Table II-12 displays the number of selected projects by AV. There were 12 different AVs that had selected projects. Solar Sense had nine selected projects, PSG Energy Group had five selected projects, Windfree Wind and Solar had four selected projects, and Central Road Energy had three selected projects. Eight other vendors had one or two selected projects.

**Table II-12
All Selected Projects
Approved Vendors**

Vendor	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Solar Sense, Inc.	3	2	5	4	0	0	4	7	2	0	9
PSG Energy Group	2	0	2	3	0	0	3	5	0	0	5
Windfree Wind and Solar	0	0	0	4	0	0	4	4	0	0	4
Central Road Energy	0	0	0	3	0	0	3	3	0	0	3
Carbon Solutions Group	0	0	0	2	0	0	2	2	0	0	2
Novel Energy Solutions	2	0	2	0	0	0	0	2	0	0	2
Promethean Solar	0	0	0	0	2	0	2	0	2	0	2
SunPower Corporation	0	1	1	0	1	0	1	0	2	0	2
Centralia City School Dist.	0	0	0	1	0	0	1	1	0	0	1
Groundswell, Inc.	0	0	0	0	1	0	1	0	1	0	1
SA Energy LLC	0	0	0	0	0	1	1	0	0	1	1
Trajectory Energy Partners	0	1	1	0	0	0	0	0	1	0	1
Total	7	4	11	17	4	1	22	24	8	1	33

Table II-13 displays the number of submitted projects by utility territory. The table shows that 73 projects were submitted in Ameren's territory, 72 were submitted in ComEd's territory, and five were submitted in the territory of rural or municipal utilities.

**Table II-13
All Submitted Projects
Utility Territory**

Utility Territory	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Ameren	22	22	0	44	11	18	0	29	33	40	0	73
ComEd	3	23	1	27	22	12	11	45	25	35	12	72
Rural Electric Coop	2	0	0	2	1	0	0	1	3	0	0	3
Municipal Utility	1	0	0	1	1	0	0	1	2	0	0	2
Total	28	45	1	74	35	30	11	76	63	75	12	150

Table II-14 displays the number of selected projects by utility territory. The table shows that 21 projects in Ameren's territory and 12 in ComEd's territory were selected.

Table II-14
All Selected Projects
Utility Territory

Utility Territory	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Ameren	5	3	8	10	3	0	13	15	6	0	21
ComEd	2	1	3	7	1	1	9	9	2	1	12
Total	7	4	11	17	4	1	22	24	8	1	33

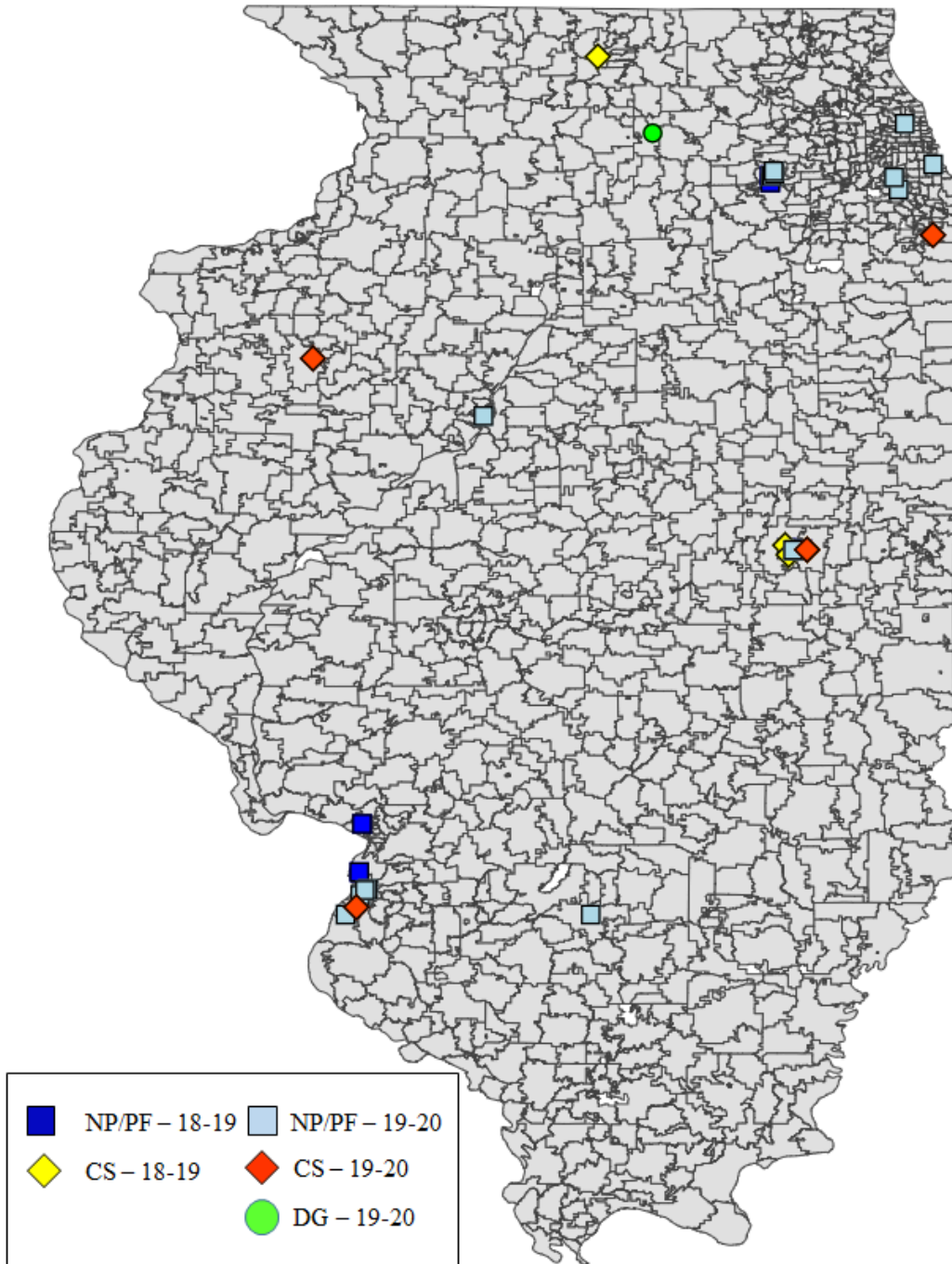
Table II-15 displays the number of selected projects by city. The table shows that the selected projects are located in 17 different cities. While six selected projects were located in Urbana, five were located in Champaign, and four were located in Aurora.

Table II-15
All Selected Projects
Illinois City

City	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Urbana	2	1	3	2	1	0	3	4	2	0	6
Champaign	1	2	3	2	0	0	2	3	2	0	5
Aurora	1	0	1	3	0	0	3	4	0	0	4
East St. Louis	0	0	0	3	0	0	3	3	0	0	3
Chicago	0	0	0	2	0	0	2	2	0	0	2
Chicago Ridge	0	0	0	2	0	0	2	2	0	0	2
Alton	1	0	1	0	0	0	0	1	0	0	1
Cahokia	0	0	0	0	1	0	1	0	1	0	1
Centralia	0	0	0	1	0	0	1	1	0	0	1
Chicago Heights	0	0	0	0	1	0	1	0	1	0	1
DeKalb	0	0	0	0	0	1	1	0	0	1	1
Dupo	0	0	0	1	0	0	1	1	0	0	1
Galesburg	0	0	0	0	1	0	1	0	1	0	1
Granite City	1	0	1	0	0	0	0	1	0	0	1
Montgomery	1	0	1	0	0	0	0	1	0	0	1
Peoria	0	0	0	1	0	0	1	1	0	0	1
Rockford	0	1	1	0	0	0	0	0	1	0	1
Total	7	4	11	17	4	1	22	24	8	1	33

Figure II-1 displays the location of the selected projects by sub-program and program year.

Figure II-1
ILSFA Program Selected Project Locations



To characterize the urbanity of the selected projects, we initially applied the Census definition to the addresses of the selected projects.²⁵ The Census defines an urban area as an area with at least 2,500 people, at least 1,500 of which reside outside institutional group quarters. Rural encompasses all other areas not included in the urban areas. This definition classified all selected projects as being in urban areas, when most would not consider many of these locations urban. We instead used a definition from the Department of Health and Human Services, as published in the Federal Register²⁶ and applied the following methodology.

- The five-digit zip code for each project’s installation was matched to the corresponding Census Zip Code Tabulation Area (ZCTA). ZCTAs are the Census Bureau’s geographical approximation of zip codes, which are used to report Census data.
- Data from the 2010 Census on population density (number of people per square mile of land area) at the ZCTA-level was used to classify each project as urban, rural, or suburban using the following schema.
 - Urban is defined as a five-digit ZCTA in which the population density is greater than 3,000 persons per square mile
 - Suburban is defined as a five-digit ZCTA in which the population density is between 1,000 and 3,000 persons per square mile
 - Rural is defined as a five-digit ZCTA in which the population density is less than 1,000 persons per square mile.

Table II-16 shows that 13 projects were characterized as being in urban locations, ten in suburban locations, and ten in rural locations.

**Table II-16
All Selected Projects
Urbanity**

Urbanity	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
Urban	2	2	4	9	0	0	9	11	2	0	13
Suburban	2	0	2	6	2	0	8	8	2	0	10
Rural	3	2	5	2	2	1	5	5	4	1	10
Total	7	4	11	17	4	1	22	24	8	1	33

Table II-17 shows that the census tracts that had selected projects were comprised of an average of 50 percent minorities (non-white), compared to an average of 30 percent minorities in census tracts that did not have selected projects. While 52 percent of the

²⁵ <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural/2010-urban-rural.html>

²⁶ <https://www.cms.gov/Regulations-and-Guidance/Regulations-and-Policies/QuarterlyProviderUpdates/downloads/cms4063ifc.pdf>

census tracts that had selected projects had more than 50 percent minority households, 20 percent of the census tracts without selected projects had more than 50 percent minority households. The census tracts without selected projects were similar to the overall state composition and the census tracts with selected projects were more likely to have large minority populations.

Table II-17
All Selected Projects
Minority Communities

Percent Minority	Census Tracts Without Selected Projects	Census Tracts With Selected Projects	All Census Tracts in Illinois
Number of Census Tracts	3,091	25	3,116
≤ 10%	31%	4%	31%
11% - 25%	27%	20%	27%
26% - 50%	21%	24%	21%
> 50%	20%	52%	21%
Total	100%	100%	100%
Mean	30%	50%	30%

Table II-18 displays the number of submitted projects in EJ communities, in low-income census tracts, and by minority or women-owned businesses. The 150 submitted projects had the following characteristics.

- About half, 78 were in EJ communities.
- Over two thirds, 109 were in low-income census tracts.
- Six were submitted by MWBEs.
- 113 of the 150 projects had one of these characteristics.
- 37 projects had none of these characteristics.

Table II-18
All Submitted Projects
EJ Community, Low-Income Census Tract, and MWBE Businesses

Category	PY1: 2018-2019				PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	DG	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
EJ Community	14	19	0	33	29	7	9	45	43	26	9	78
LI Census Tract	22	28	1	51	34	13	11	58	56	41	12	109
MWBE	2	0	1	3	3	0	0	3	5	0	1	6
At Least One of Above	22	30	1	53	35	14	11	60	57	44	12	113
None of the Above	6	15	0	21	0	16	0	16	6	31	0	37
Total Submitted Projects	28	45	1	74	35	30	11	76	63	75	12	150

Table II-19 displays the number of selected projects in EJ communities, in low-income census tracts, and by minority or women-owned businesses.

- 19 of the 24 selected NP/PF projects were located in EJ communities, and 23 were located in LI census tracts.
- 3 of the 8 selected CS projects were located in EJ communities and 6 were located in LI census tracts.
- None of the selected projects were submitted by MWBEs.

**Table II-19
Selected Projects
EJ Community, Low-Income Census Tract, and MWBE Businesses**

Category	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
EJ Community	5	1	6	14	2	0	16	19	3	0	22
LI Census Tract	7	2	9	16	4	1	21	23	6	1	30
MWBE	0	0	0	0	0	0	0	0	0	0	0
At Least One of Above	7	2	9	17	4	1	22	24	6	1	31
None of the Above	0	2	2	0	0	0	0	0	2	0	2
Total Selected Projects	7	4	11	17	4	1	22	24	8	1	33

Table II-20 breaks down the NP/PF projects into the two sub-program segments. The table shows that 14 of the selected projects were non-profit and that ten of the selected projects were public facilities.

**Table II-20
Non-Profit and Public Facility Projects
Non-Profit or Public Facility**

Type of Project	Non-Profit / Public Facility Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
Non-Profit	4	13	17	10	17	27	14	30	44
Public Facility	3	8	11	7	1	8	10	9	19
Total	7	21	28	17	18	35	24	39	63

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-21 displays the agreement type for NP/PF projects. While 14 selected projects were power purchase agreements (PPAs), eight were leases, and two were purchases.

Table II-21
Non-Profit and Public Facility Projects
Agreement Type

Agreement Types	Non-Profit / Public Facility Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
PPA	4	10	14	10	13	23	14	23	37
Lease	3	9	12	5	1	6	8	10	18
Purchase	0	2	2	2	4	6	2	6	8
Total	7	21	28	17	18	35	24	39	63

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-22 provides the term of agreement for the NP/PF projects. The table shows that ten of the selected projects had a 15-year term, four had a 20-year term, eight had a 25-year term, one had a shorter term, and one was missing these data.

Table II-22
Non-Profit and Public Facility Projects
Term of Agreement

Term of Agreement (Years)	Non-Profit / Public Facility Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
0	0	2	2	0	2	2	0	4	4
5-10	0	1	1	1	0	1	1	1	2
11-14	0	2	2	0	1	1	0	3	3
15	5	7	12	5	9	14	10	16	26
20	0	8	8	4	4	8	4	12	16
25	2	1	3	6	2	8	8	3	11
Missing	0	0	0	1	0	1	1	0	1
Total	7	21	28	17	18	35	24	39	63

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-23 displays the anchor type for the CS projects. While three of the selected CS projects had a public facility as an anchor, two had a non-profit as an anchor, and three did not have an anchor.

Table II-23
Low-Income Community Solar Projects
Projected Anchor Type

Anchor Type	Community Solar Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
Public Facility	2	14	16	1	11	12	3	25	28
Non-Profit	0	7	7	2	5	7	2	12	14
Other	0	1	1	0	0	0	0	1	1
None	2	19	21	1	10	11	3	29	32
Total	4	41	45	4	26	30	8	67	75

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-24 displays the projected anchor share for the CS projects. The table shows that three of the selected projects did not have an anchor, two had an anchor share between 12 and 20 percent, one had a share of 24 to 25 percent, and two had an anchor share of 40 percent.

Table II-24
Low-Income Community Solar Projects
Projected Anchor Share

Anchor Share	Community Solar Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
0%	2	20	22	1	10	11	3	30	33
2% - 5%	0	4	4	0	2	2	0	6	6
10%	0	2	2	0	2	2	0	4	4
12% - 20%	1	0	1	1	0	1	2	0	2
24% - 25%	0	2	2	1	0	1	1	2	3
33% - 37%	0	3	3	0	2	2	0	5	5
40%	1	10	11	1	10	11	2	20	22
Total	4	41	45	4	26	30	8	67	75

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-25 displays the distribution of DG projects between one to four unit buildings and five or more unit buildings. The selected project was in a five or more unit building. However, ten of the 12 submitted projects were in one-to-four unit buildings.

Table II-25
Low-Income Distributed Generation Projects
1-4 Units or 5+ Units

Housing Type	Distributed Generation Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total PY1	Selected	Not Selected	Total PY2	Selected	Not Selected	Total
1-4 Units	0	0	0	0	10	10	0	10	10
5+ Units	0	1	1	1	0	1	1	1	2
Total	0	1	1	1	10	11	1	11	12

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

Table II-26 displays the funding source for the selected projects. Seventeen of the 24 NP/PF projects, five of the eight CS projects, and the DG project will be funded through the RERF.

Table II-26
All Selected Projects
Funding Source

Funding Source	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NPPF	CS	Total PY1	NPPF	CS	DG	Total PY2	NPPF	CS	DG	Total
RERF	6	3	9	11	2	1	14	17	5	1	23
Utility	1	1	2	6	2	0	8	7	3	0	10
Total	7	4	11	17	4	1	22	24	8	1	33

Table II-27 displays the projected project size for the selected projects. The mean size for the NP/PF projects was 152 AC kW, and the mean size for CS projects was 971 AC kW. The selected DG project was 2,000 AC kW.

There is some concern that many of the CS projects are large in size and not truly community-driven. Five of the eight selected CS projects were 750 AC kW or larger and three were 1,850 AC kW or larger. This relates to the project economics and the developers looking for economies of scale in project implementation.

Table II-27
All Selected Projects
Projected Project Size (AC kW)

Project Size (AC kW)	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
≤25 kW	1	1	2	4	0	0	4	5	1	0	6
26-50 kW	0	1	1	4	0	0	4	4	1	0	5
51-100 kW	3	0	3	2	0	0	2	5	0	0	5
101-1,000 kW	3	0	3	7	2	0	9	10	2	0	12
1,001-1,999 kW	0	1	1	0	2	0	2	0	3	0	3
2,000 kW	0	1	1	0	0	1	1	0	1	1	2
Total	7	4	11	17	4	1	22	24	8	1	33
Mean Size	186	976	473	138	967	2,000	373	152	971	2,000	407

Table II-28 displays the projected estimated production from the PV Watts tool for the selected projects. The mean production for the NP/PF projects was about 231 MWh per year and the mean for CS was about 1,910 MWh per year. The DG project size was 4,190 MWh per year.

Table II-28
All Selected Projects
Projected Estimated Production (MWh/Year)

Projected Estimated Production (MWh/Year)	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
21 – 40	1	0	1	2	0	0	2	3	0	0	3
41 – 50	0	1	1	4	0	0	4	4	1	0	5
51 – 100	0	1	1	3	0	0	3	3	1	0	4
101 – 200	4	0	4	1	0	0	1	5	0	0	5
201 – 300	0	0	0	3	0	0	3	3	0	0	3
301 – 500	1	0	1	2	1	0	3	3	1	0	4
501 – 1,000	1	0	1	2	0	0	2	3	0	0	3
1,601 – 1,700	0	0	0	0	2	0	2	0	2	0	2
3,701 – 4,200	0	2	2	0	1	1	2	0	3	1	4
Total	7	4	11	17	4	1	22	24	8	1	33
Mean Production	275	1,942	881	213	1,877	4,190	697	231	1,910	4,190	758

Table II-29 displays the contracted number of RECs for the selected projects. The table shows that the mean was 3,301 for the NP/PF projects and 28,389 for the CS projects. The DG project had 60,693 contracted RECS.

Table II-29
All Selected Projects
Contracted Number of RECs

Contracted # of RECs	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
301 – 500	1	0	1	1	0	0	1	2	0	0	2
501 – 750	0	1	1	6	0	0	6	6	1	0	7
901 – 1,000	0	1	1	1	0	0	1	1	1	0	2
1,001 – 3,000	4	0	4	2	0	0	2	6	0	0	6
3,001 – 4,000	0	0	0	3	0	0	3	3	0	0	3
5,001 – 7,000	1	0	1	2	1	0	3	3	1	0	4
9,001 – 12,000	1	0	1	2	0	0	2	3	0	0	3
23,396	0	0	0	0	1	0	1	0	1	0	1
32,460	0	0	0	0	1	0	1	0	1	0	1
52,823	0	1	1	0	0	0	0	0	1	0	1
55,425	0	1	1	0	1	0	1	0	2	0	2
60,693	0	0	0	0	0	1	1	0	0	1	1
Total	7	4	11	17	4	1	22	24	8	1	33
Mean RECs	3,932	27,450	12,484	3,041	29,327	60,693	10,441	3,301	28,389	60,693	11,112

Table II-30 displays the REC value for the selected projects. The table shows that the NP/PF projects averaged about \$330,000 and the CS projects averaged about \$2.87 million in REC value. The DG project had a REC value of \$4 million.

Table II-30
All Selected Projects
REC Value (\$ Millions)

REC Value (\$ Millions)	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
\$0.04 - <\$0.10	1	1	2	5	0	0	5	6	1	0	7
\$0.10 - <\$0.20	1	1	2	4	0	0	4	5	1	0	6
\$0.20 - <\$0.30	2	0	2	1	0	0	1	3	0	0	3
\$0.30 - <\$0.40	1	0	1	2	0	0	2	3	0	0	3
\$0.40 - <\$0.50	0	0	0	2	0	0	2	2	0	0	2
\$0.60 - <\$0.70	1	0	1	1	1	0	2	2	1	0	3

REC Value (\$ Millions)	PY1: 2018-2019			PY2: 2019-2020				PY1 & PY2: 2018-2020			
	NP PF	CS	Total PY1	NP PF	CS	DG	Total PY2	NP PF	CS	DG	Total
\$0.90 - <\$1.00	0	0	0	2	0	0	2	2	0	0	2
\$1.10	1	0	1	0	0	0	0	1	0	0	1
\$2.45	0	0	0	0	1	0	1	0	1	0	1
\$3.40	0	0	0	0	1	0	1	0	1	0	1
\$4.00	0	0	0	0	0	1	1	0	0	1	1
\$5.00 - \$6.00	0	2	2	0	1	0	1	0	3	0	3
Total	7	4	11	17	4	1	22	24	8	1	33
Mean Value	\$0.39	\$2.84	\$1.29	\$0.31	\$2.90	\$4.00	\$0.95	\$0.33	\$2.87	\$4.00	\$1.06

Table II-31 displays the dollars and percent of REC dollars in Ameren and ComEd service territories. The table shows that 60 percent of the REC value was in Ameren’s service territory and 40 percent of the REC value was in ComEd’s service territory. (The split for all project applications was the same as the split for selected projects.)

**Table II-31
All Selected Projects
REC Value (\$ Millions) by Utility Territory**

Utility Territory	PY1: 2018-2019						PY2: 2019-2020							
	NP/PF		CS		Total – PY1		NP/PF		CS		DG		Total – PY2	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Ameren	\$1.46	53%	\$6.02	53%	\$7.48	53%	\$2.67	51%	\$10.95	95%	\$0.00	0%	\$13.62	65%
ComEd	\$1.30	47%	\$5.36	47%	\$6.66	47%	\$2.59	49%	\$0.63	5%	\$4.00	100%	\$7.22	35%
Total	\$2.76	100%	\$11.37	100%	\$14.14	100%	\$5.26	100%	\$11.58	100%	\$4.00	100%	\$20.84	100%

Utility Territory	PY1 & PY2: 2018-2020							
	NP/PF		CS		DG		Total	
	#	%	#	%	#	%	#	%
Ameren	\$4.13	52%	\$16.97	74%	\$0.00	0%	\$21.10	60%
ComEd	\$3.89	48%	\$5.99	26%	\$4.00	100%	\$13.88	40%
Total	\$8.03	100%	\$22.96	100%	\$4.00	100%	\$34.98	100%

Table II-32 displays the dollars and percent of REC dollars by urbanity. The table shows that seven percent of the REC value was in urban areas, 22 percent was in suburban areas, and 71 percent was in rural areas, due to the location of the large CS projects and the one DG project.

Table II-32
All Selected Projects, 2018-2020
REC Value (\$ Millions) by Urbanity

REC Value	PY1: 2018-2019						PY2: 2019-2020							
	NP/PF		CS		Total – PY1		NP/PF		CS		DG		Total – PY2	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Urban	\$0.41	15%	\$0.21	2%	\$0.61	4%	\$1.93	37%	\$0.00	0%	\$0.00	0%	\$1.93	9%
Suburban	\$1.30	47%	\$0.00	0%	\$1.30	9%	\$2.35	45%	\$4.03	35%	\$0.00	0%	\$6.38	31%
Rural	\$1.06	38%	\$11.16	98%	\$12.22	86%	\$0.98	19%	\$7.55	65%	\$4.00	100%	\$12.54	60%
Total	\$2.76	100%	\$11.37	100%	\$14.14	100%	\$5.26	100%	\$11.58	100%	\$4.00	100%	\$20.84	100%

REC Value	PY1 & PY2: 2018-2020							
	NP/PF		CS		DG		Total	
	#	%	#	%	#	%	#	%
Urban	\$2.33	29%	\$0.21	1%	\$0.00	0%	\$2.54	7%
Suburban	\$3.65	46%	\$4.03	18%	\$0.00	0%	\$7.69	22%
Rural	\$2.04	25%	\$18.71	82%	\$4.00	100%	\$24.75	71%
Total	\$8.03	100%	\$22.96	100%	\$4.00	100%	\$34.98	100%

Table II-33 displays the dollars and percent of REC dollars in EJ communities and low-income Census Tracts. The table shows that 71 percent of the REC value for NP/PF projects and 50 percent of the REC value for CS projects were in EJ communities. Almost all of the REC value was in low-income Census Tracts.²⁷

Table II-33
All Selected Projects
REC Value (\$) in Environmental Justice Communities and Low-Income Census Tracts

Community Type	PY1: 2018-2019						PY2: 2019-2020							
	NP/PF		CS		Total – PY1		NP/PF		CS		DG		Total – PY2	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
In EJ	\$1.89	68%	\$5.81	51%	\$7.70	54%	\$3.78	72%	\$5.73	49%	\$0.00	0%	\$9.51	46%
Not in EJ	\$0.88	32%	\$5.56	49%	\$6.44	46%	\$1.48	28%	\$5.85	51%	\$4.00	100%	\$11.33	54%

²⁷ The CS locations relate to the project's location and not the subscribers' locations. The subscribers' locations will be examined once the projects are energized and have subscribers.

Community Type	PY1: 2018-2019						PY2: 2019-2020							
	NP/PF		CS		Total – PY1		NP/PF		CS		DG		Total – PY2	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
In LI Tracts	\$2.76	100%	\$11.16	98%	\$13.93	99%	\$4.65	88%	\$11.58	100%	\$4.00	100%	\$20.23	97%
Not LI Tracts	\$0.00	0%	\$0.21	2%	\$0.21	1%	\$0.61	12%	\$0.00	0%	\$0.00	0%	\$0.61	3%
Total	\$2.76	100%	\$11.37	100%	\$14.14	100%	\$5.26	100%	\$11.58	100%	\$4.00	100%	\$20.84	100%

Community Type	PY1 & PY2: 2018-2020							
	NP/PF		CS		DG		Total	
	#	%	#	%	#	%	#	%
In EJ	\$5.67	71%	\$11.54	50%	\$0.00	0%	\$17.21	49%
Not in EJ	\$2.35	29%	\$11.42	50%	\$4.00	100%	\$17.77	51%
In LI Tracts	\$7.41	92%	\$22.75	99%	\$4.00	100%	\$34.16	98%
Not LI Tracts	\$0.61	8%	\$0.21	1%	\$0.00	0%	\$0.82	2%
Total	\$8.03	100%	\$22.96	100%	\$4.00	100%	\$34.98	100%

Table II-34 displays the first year costs savings and the total costs and savings for the NP/PF projects.

**Table II-34
Non-Profit and Public Facility Projects, 2018-2020
Selected Project Costs and Savings**

Project Year	Costs and Savings	#	Selected Non-Profit/ Public Facility Project Costs and Savings							Max
			Mean	Min	Percentile					
					P10	P25	P50	P75	P90	
PY1: 2018-2019	First Year Costs	7	\$8,762	\$12	\$12	\$12	\$867	\$22,228	\$32,800	\$32,800
	Total Costs	7	\$205,712	\$181	\$181	\$181	\$12,561	\$322,000	\$948,692	\$948,692
	First Year Savings	7	\$14,731	\$1,838	\$1,838	\$5,400	\$10,953	\$24,951	\$32,800	\$32,800
	Total Savings	7	\$354,678	\$31,584	\$31,584	\$156,187	\$258,112	\$447,869	\$948,692	\$948,692
PY2: 2019-2020	First Year Costs	17	\$57,064	\$12	\$12	\$1,476	\$4,388	\$13,104	\$30,600	\$859,403
	Total Costs	16	\$139,286	\$181	\$181	\$8,155	\$70,467	\$263,017	\$377,117	\$475,518
	First Year Savings	16	\$8,618	\$1,535	\$2,128	\$3,410	\$5,396	\$10,987	\$16,373	\$34,413
	Total Savings	16	\$206,256	\$17,776	\$38,925	\$78,011	\$124,673	\$330,499	\$534,148	\$581,070

Project Year	Costs and Savings	#	Selected Non-Profit/ Public Facility Project Costs and Savings							
			Mean	Min	Percentile					Max
					P10	P25	P50	P75	P90	
PY1 & PY2: 2018-2020	First Year Costs	24	\$42,976	\$12	\$12	\$12	\$3,346	\$14,429	\$30,600	\$859,403
	Total Costs	23	\$159,503	\$181	\$181	\$181	\$55,869	\$313,702	\$377,117	\$948,692
	First Year Savings	23	\$10,479	\$1,535	\$2,128	\$4,450	\$8,188	\$15,753	\$24,951	\$34,413
	Total Savings	23	\$251,428	\$17,776	\$38,925	\$100,153	\$156,187	\$391,144	\$534,148	\$948,692

NOTE: One PY2 project with a Purchase Agreement only had data for First Year Costs.

Table II-35 displays the total percentage savings over the term of the agreement. This averages 72 percent, greater than the required 50 percent, for the selected NP/PF projects.

Table II-35
Non-Profit and Public Facility Projects
Total Savings over the Term of Agreement

Total Savings	Non-Profit / Public Facility Participants								
	PY1: 2018-2019			PY2: 2019-2020			PY1 & PY2: 2018-2020		
	Selected	Not Selected	Total – PY1	Selected	Not Selected	Total – PY2	Selected	Not Selected	Total
19%	0	2	2	0	0	0	0	2	2
50%-52%	2	1	3	5	3	8	7	4	11
56%-58%	1	8	9	0	1	1	1	9	10
59%-61%	0	2	2	3	0	3	3	2	5
62%-64%	0	0	0	3	1	4	3	1	4
69%-71%	1	2	3	0	5	5	1	7	8
75%	0	0	0	1	0	1	1	0	1
96%-98%	0	0	0	0	3	3	0	3	3
100%	3	6	9	4	5	9	7	11	18
Missing	0	0	0	1	0	1	1	0	1
Total	7	21	28	17	18	35	24	39	63
Mean	76%	67%	69%	68%	79%	74%	71%	72%	72%

NOTE: "Not Selected" includes eligible projects that were not selected and all projects that were ineligible, withdrawn, rejected, or under review as of December 2019.

H. DG Participant Statistics

Elevate Energy is responsible for collecting and maintaining participant data. This information includes income verification information as well as additional data from disclosure forms. These provide important information for the evaluation. Elevate provided these data without individual participant identification information to protect the confidentiality of program participants. Information provided and summarized in this section includes the following.

- Project Stage
- Zip Code
- Project Type
- Household Income
- Number of Household Members
- Income Eligibility Determination Method
- Home Ownership
- Race (to be included on future disclosure forms)
- Customer Energy Value
- Total Project REC Value
- Business Model
- Estimated Production (kWh)

Data provided as of January 2020 included information for one selected multi-family DG project and an additional 21 1-4 unit DG projects that were pre-application, under review, or dropped. Community Solar projects will include information on subscribers (and will be included in the evaluation) when they reach the next stage of project submission.

Table II-36 displays information on the project stage and type of project for participants included in the anonymized participant file. The table shows that in addition to the one selected and approved multi-family DG project, there were 11 projects in the pre-application stage, nine projects in the review stage, and one project that had been dropped. All of these projects were submitted by one AV, and all projects other than the in-progress project were 1-4 unit DG projects.

**Table II-36
Project Stage and Type**

Project Stage	Type of Project	Number of Projects
Pre-Application	1-4 Distributed Generation	11
Part I Submitted & Under Review	1-4 Distributed Generation	9
Dropped – Ineligible	1-4 Distributed Generation	1
ICC Approved/Construction	5+ Distributed Generation	1

Table II-37 displays the type of income verification used for each project. The table shows that the following methods were used.

- Tax Transcript Request: This was provided by 12 projects under various stages in the project application process. This is a signed 4506-T IRS form that will allow the program administrator to contact the IRS and request the previous year's income

information on the participant's behalf. A completed 4506-T form is needed for each adult household member who files separately.²⁸

- **Third Party Program:** This was provided by seven projects, all but one in the pre-application stage. This is documentation of approval or current enrollment in one of the following programs within the last 12 months.
 - Low Income Home Energy Assistance Program (LIHEAP)
 - Illinois Housing Weatherization Assistance Program
 - U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers
 - U.S. Department of HUD Project-Based Rental Assistance
 - 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 Assistance for Needy Families (TANF)
 - Medicaid
- **Building Rent Rolls:** This method was used by the selected and ICC Approved multi-family project. The rent rolls demonstrate payment of monthly housing costs, including utilities other than telephone, of no more than 30 percent of the maximum allowable income (as pursuant to the Illinois Affordable Housing Act) as defined by the HUD FY19 Fair Market Rent prices for the county.
- **W2 Form:** One project in the pre-application stage used this method.
- **Qualified Census Tract:** This method was used by one project in the pre-application stage. While this method is not allowable for 1-4 unit DG projects, the specific project that used this method was not approved.

Table II-37
Type of Verification Used

Type of Verification	Project Stage				
	Pre-Application Projects	Part I Submitted & Under Review	Dropped Ineligible	ICC Approved/ Construction	All Projects
Tax Transcript Request	3	8	1	0	12
Third Party Program	6	1	0	0	7
Building Rent Rolls	0	0	0	1	1
W2	1	0	0	0	1
Qualified Census Tract	1	0	0	0	1
All Projects	11	9	1	1	22

²⁸ This is conducted by a third-party service, not directly through the IRS.

Table II-38 displays the household income and poverty level for 16 of the 22 projects in the file that included these data. The table shows that there was a wide range of household income and poverty levels for the households. They ranged from 12 percent of the poverty level to 328 percent (these projects had not yet been approved). Households at the lowest poverty level will experience the greatest impacts on energy burden and affordability.

Table II-38
Household Income and Poverty Level

Project Stage	Observations with Data	Income			Poverty Level		
		Min	Mean	Max	Min	Mean	Max
Pre-Application	7	\$1,775	\$30,303	\$66,245	12%	151%	328%
Part I Submitted & Under Review	8	\$9,816	\$29,388	\$53,000	46%	169%	308%
Dropped – Ineligible	1	\$62,000	\$62,000	\$62,000	179%	179%	179%
ICC Approved/Construction	0	--	--	--	--	--	--
All Projects with Data	16	\$1,775	\$31,826	\$66,245	12%	162%	328%

Note: One ICC Approved/Construction project was excluded because income verification was based upon building rent rolls, one Part I Submitted & Under Review project was excluded due to missing number of household members data, and four Pre-Application projects were excluded due to missing both income and number of household member data.

Table II-39 displays the energy value and first year costs. Energy values ranged from \$437 to \$1,332, and first year costs ranged from \$192 to \$585.

Table II-39
Energy Value and First Year Costs

Project Stage	Observations with Data	Customer Energy Value			First Year Costs		
		Min	Mean	Max	Min	Mean	Max
Pre-Application	6	\$437	\$679	\$872	\$192	\$298	\$383
Part I Submitted & Under Review	9	\$633	\$963	\$1,332	\$278	\$423	\$585
Dropped – Ineligible	1	\$916	\$916	\$916	\$402	\$402	\$402
ICC Approved/Construction	0	--	--	--	--	--	--
All Projects with Data	16	\$437	\$854	\$1,332	\$192	\$375	\$585

Note: Five Pre-Application Projects and one ICC Approved/Construction Projects were excluded due to missing Energy Value and First Year Costs data.

Table II-40 displays the customer first year savings and percent savings as a percent of total energy value. Customer first year savings ranged from \$245 to \$747 and were 56 percent of energy value for all customers because all projects were submitted by one AV with one business model.

The selected and approved multi-family project provided first year savings of \$303,404. While the original data showed that currently 305 units are occupied, additional information showed that there are as many as 526 units that could be occupied. Therefore, the per household first-year savings will range from \$577 to \$995, depending on the number of units occupied. The plan is to attribute all kWh production to tenants and none to common areas.

**Table II-40
Customer Savings and Percent Savings**

Project Stage	Observations with Data	Customer Savings			Customer % Savings		
		Min	Mean	Max	Min	Mean	Max
Pre-Application	6	\$245	\$381	\$489	56%	56%	56%
Part I Submitted & Under Review	9	\$355	\$540	\$747	56%	56%	56%
Dropped – Ineligible	1	\$514	\$514	\$514	56%	56%	56%
ICC Approved/Construction	0	--	--	--	--	--	--
All Projects	16	\$245	\$479	\$747	56%	56%	56%

Note: Five Pre-Application Projects and one ICC Approved/Construction Project were excluded due to missing savings data.

Table II-41 displays the production and REC value. Estimated production for the one approved project was 418,944 kWh, while production for the other projects ranged from about 5,000 kWh to 13,000 kWh. The one approved project had a REC value of over \$4 million, while the REC value for the other projects ranged from under \$9,000 to about \$22,000.

**Table II-41
Production and REC Value**

Project Stage	Obs. with Data	Est. Production (kWh)			Projected REC Value		
		Min	Mean	Max	Min	Mean	Max
Pre-Application	5	5,375	6,252	7,902	\$8,872	\$11,876	\$14,309
Part I Submitted & Under Review	9	5,394	8,552	13,288	\$10,732	\$16,121	\$22,179
Dropped – Ineligible	1	8,104	8,104	8,104	\$15,168	\$15,168	\$15,168
ICC Approved/Construction	1	418,944	418,944	418,944	\$4,000,883	\$4,000,883	\$4,000,883

Note: Six Pre-Application Projects were excluded due to missing production and REC value data.

Energy burden is defined as energy costs divided by income. The ILSFA Program reduces energy burden by reducing the costs for electricity due the savings realized through the program each year. The percentage point reduction in energy burden is the savings divided by household income. Table II-42A displays a calculation of the energy burden impact for each project that had income and savings data in the data file. The projects reduced energy

burden from less than one percentage point for the higher income households to over 36 percentage points for the lower income households.

Table II-42A
Energy Burden Impact for Observations with Income and Savings Data

Project Stage	Household Income	First Year Savings	Energy Burden Reduction
Pre-Application	\$1,775	\$475.00	26.8%
Pre-Application	\$66,245	\$319.00	0.5%
Pre-Application	\$45,000	\$391.00	0.9%
Pre-Application	\$2,600	\$366.00	14.1%
Pre-Application	\$42,500	\$245.00	0.6%
Pre-Application	\$41,000	\$489.00	1.2%
Part I Submitted and Under Review	\$19,800	\$694.00	3.5%
Part I Submitted and Under Review	\$22,000	\$355.00	1.6%
Part I Submitted and Under Review	\$36,096	\$403.00	1.1%
Part I Submitted and Under Review	\$11,781	\$554.00	4.7%
Part I Submitted and Under Review	\$53,000	\$541.00	1.0%
Part I Submitted and Under Review	\$38,500	\$395.00	1.0%
Part I Submitted and Under Review	\$44,110	\$588.63	1.3%
Part I Submitted and Under Review	\$2,051	\$747.00	36.4%
Part I Submitted and Under Review	\$9,816	\$582.00	5.9%
Dropped - Ineligible	\$62,000	\$514.00	0.8%

Some of the pre-application projects did not have any of the data needed to estimate the energy burden reduction, and the selected and approved project did not have household income data. Table II-42B provides an estimate of the energy burden reduction using the following estimates.

- Mean household income from the ACS analysis for each zip code is used (with the exception of one project where income data was included in the data file).
- First year savings for the pre-application projects uses the mean savings from the other pre-application projects.
- First year savings for the selected and approved project uses the midpoint of the two unit-level savings estimates based on the current and maximum number of units occupied.

Table II-42B shows that the energy burden reduction for these projects ranged from 0.5 percentage points to 2.9 percentage points. However, if these households have lower than mean income, the impact could be higher. (Note that the one project that did have income data available, had reported annual income of only \$13,000 compared to the mean incomes in the zip codes that ranged from \$47,139 to \$73,144.) The greatest burden reduction for

these households is for the one that had actual income data in the data file and did not use mean ACS income data.

Table II-42B
Energy Burden Impact for Observations with Missing Data
Mean Income in Zip Code Used as Income Estimate

Project Stage	Zip Code	Type	Own	Mean Household Income in the Zip Code	First Year Savings	Energy Burden Reduction
Pre-Application	60473	1-4	Missing	\$73,144	\$381	0.5%
Pre-Application	60653	1-4	Missing	\$51,883	\$381	0.7%
Pre-Application	60609	1-4	Missing	\$47,139	\$381	0.8%
Pre-Application	60609	1-4	Missing	\$47,139	\$381	0.8%
Pre-Application*	60827	1-4	Own	\$13,000	\$381	2.9%
ICC Approved/Construction	60115	5+	Rent	\$57,504	\$786	1.4%

*Note: Household Income data for this project was included in the data file. The mean household income from the ACS analysis was not used for this project.

Table II-42C provides the same analysis but uses 80 percent of AMI and average household size for the zip code instead of mean income for the zip code to estimate the missing income level. The 80 percent of AMI for the zip code represents the maximum income that the household could have to be eligible for the ILSFA Program. The results using 80 percent of AMI in Table II-42C are approximately the same as the results using mean income in Table II-42B. Reductions in energy burden range from 0.7 percentage points to 2.9 percentage points.

Table II-42C
Energy Burden Impact for Observations with Missing Data
80% AMI in Zip Code Used as Income Estimate

Project Stage	Zip Code	Type	Own	Mean Household Size in the Zip Code	80% AMI in the Zip Code	First Year Savings	Energy Burden Reduction
Pre-Application	60473	1-4	Missing	3	\$56,900	\$381	0.7%
Pre-Application	60653	1-4	Missing	2	\$50,600	\$381	0.8%
Pre-Application	60609	1-4	Missing	3	\$56,900	\$381	0.7%
Pre-Application	60609	1-4	Missing	3	\$56,900	\$381	0.7%
Pre-Application*	60827	1-4	Own	N/A	\$13,000	\$381	2.9%
ICC Approved/Construction	60115	5+	Rent	3	\$52,500	\$786	1.5%

*Note: Household Income data for this project was included in the data file. 80% AMI was not used for this project.

Table II-43A displays the pre and post solar estimated energy burdens. ACS data were used to estimate the mean pre-solar energy burden for ILSFA-eligible households for the housing type and county listed. ACS mean income data for the zip code were used for households with missing income data in the second part of the table. The table shows that the post-solar energy burden ranged from less than one percent to more than 46 percent. The high energy burdens were for very low-income households that can potentially receive LIHEAP to further reduce their burdens.

Table II-43A
Energy Burden Impact
Projects with Data and Estimated Data
Mean Income in Zip Code Used for Households with Missing Income Data

Projects with Data						
Project Stage	Household Income	Zip Code	Mean ACS Energy Costs	Pre-Solar Energy Burden	Energy Burden Percentage Point Reduction	Post-Solar Energy Burden
Pre-Application	\$1,775	60632	\$1,296	73.0%	26.8%	46.2%
Pre-Application	\$66,245	60632	\$1,296	2.0%	0.5%	1.5%
Pre-Application	\$45,000	60617	\$1,496	3.3%	0.9%	2.4%
Pre-Application	\$2,600	60632	\$1,296	49.9%	14.1%	35.8%
Pre-Application	\$42,500	60652	\$1,388	3.3%	0.6%	2.7%
Pre-Application	\$41,000	60649	\$1,356	3.3%	1.2%	2.1%
Part I Submitted and Under Review	\$19,800	60620	\$1,482	7.5%	3.5%	4.0%
Part I Submitted and Under Review	\$22,000	60617	\$1,496	6.8%	1.6%	5.2%
Part I Submitted and Under Review	\$36,096	60643	\$1,410	3.9%	1.1%	2.8%
Part I Submitted and Under Review	\$11,781	60619	\$1,491	12.7%	4.7%	8.0%
Part I Submitted and Under Review	\$53,000	60629	\$1,380	2.6%	1.0%	1.6%
Part I Submitted and Under Review	\$38,500	60619	\$1,491	3.9%	1.0%	2.9%
Part I Submitted and Under Review	\$44,110	60620	\$1,482	3.4%	1.3%	2.1%
Part I Submitted and Under Review	\$2,051	60649	\$1,356	66.1%	36.4%	29.7%
Part I Submitted and Under Review	\$9,816	60617	\$1,496	15.2%	5.9%	9.3%
Dropped - Ineligible	\$62,000	60620	\$1,482	2.4%	0.8%	1.6%

Projects with Estimated Data						
Project Stage	Mean Household Income in the Zip Code	Zip Code	Mean ACS Energy Costs	Pre-Solar Energy Burden	Energy Burden Reduction	Post-Solar Energy Burden
Pre-Application	\$73,144	60473	\$1,378	1.9%	0.5%	1.4%
Pre-Application	\$51,883	60653	\$1,329	2.6%	0.7%	1.9%
Pre-Application	\$47,139	60609	\$1,300	2.8%	0.8%	2.0%
Pre-Application	\$47,139	60609	\$1,300	2.8%	0.8%	2.0%
Pre-Application	\$13,000	60827	\$1,359	10.5%	2.9%	7.6%
ICC Approved/ Construction	\$57,504	60115	\$855	1.5%	1.4%	0.1%

Table II-43B displays the pre and post solar estimated energy burdens using 80 percent of AMI for the zip code for households with missing income data. Results are very similar to when the mean income in the zip code was used in the above table.

**Table II-43B
Energy Burden Impact
Projects with Estimated Data
80% AMI in Zip Code Used as Income Estimate**

Projects with Estimated Data						
Project Stage	80% AMI in the Zip Code	Zip Code	Mean ACS Energy Costs	Pre-Solar Energy Burden	Energy Burden Reduction	Post-Solar Energy Burden
Pre-Application	\$56,900	60473	\$1,378	2.4%	0.7%	1.7%
Pre-Application	\$50,600	60653	\$1,329	2.6%	0.8%	1.8%
Pre-Application	\$56,900	60609	\$1,300	2.3%	0.7%	1.6%
Pre-Application	\$56,900	60609	\$1,300	2.3%	0.7%	1.6%
Pre-Application	\$13,000	60827	\$1,359	10.5%	2.9%	7.6%
ICC Approved/ Construction	\$52,500	60115	\$855	1.6%	1.5%	0.1%

Table II-43C displays summary statistics on the energy burden impact. The table shows that mean pre-solar burden was 12.8 percent and mean post-solar burden was 7.8 percent. Values for the estimated burden were much lower because they used mean zip code values for income and mean county or county-group values for energy costs and did not include the very low income that was included in the actual data for some households.

**Table II-43C
Energy Burden Impact
Mean Income in Zip Code Used for Households with Missing Income Data**

Project Stage		Pre-Application		Part I Submitted	Dropped	ICC Approved	Total
Data Type		With Data	Estimated	With Data	With Data	Estimated	
Obs.		6	5	9	1	1	22
Energy Costs	Minimum	\$1,296	\$1,300	\$1,356	\$1,482	\$855	\$855
	Mean	\$1,355	\$1,333	\$1,454	\$1,482	\$855	\$1,373
	Maximum	\$1,496	\$1,378	\$1,496	\$1,482	\$855	\$1,496
Pre-Solar Energy Burden	Minimum	2.0%	1.9%	2.6%	2.4%	1.5%	1.5%
	Mean	22.5%	4.1%	13.6%	2.4%	1.5%	12.8%
	Maximum	73.0%	10.5%	66.1%	2.4%	1.5%	73.0%
Energy Burden Reduction	Minimum	0.5%	0.5%	1.0%	0.8%	1.4%	0.5%
	Mean	7.4%	1.1%	6.3%	0.8%	1.4%	4.9%
	Maximum	26.8%	2.9%	36.4%	0.8%	1.4%	36.4%
Post-Solar Energy Burden	Minimum	1.5%	1.4%	1.6%	1.6%	0.1%	0.1%
	Mean	15.1%	2.9%	7.3%	1.6%	0.1%	7.8%
	Maximum	46.2%	7.6%	29.7%	1.6%	0.1%	46.2%

Table II-43D shows the same results as in II-43C, but uses 80 percent of AMI for the zip code as the income estimate instead of the mean income in the zip code.

**Table II-43D
Energy Burden Impact
80% AMI for Zip Code Used for Households with Missing Income Data**

Project Stage		Pre-Application		Part I Submitted	Dropped	ICC Approved	Total
Data Type		With Data	Estimated	With Data	With Data	Estimated	
Obs.		6	5	9	1	1	22
Energy Costs	Minimum	\$1,296	\$1,300	\$1,356	\$1,482	\$855	\$855
	Mean	\$1,355	\$1,333	\$1,454	\$1,482	\$855	\$1,373
	Maximum	\$1,496	\$1,378	\$1,496	\$1,482	\$855	\$1,496
Pre-Solar Energy Burden	Minimum	2.0%	2.3%	2.6%	2.4%	1.6%	1.6%
	Mean	22.5%	4.0%	13.6%	2.4%	1.6%	12.8%
	Maximum	73.0%	10.5%	66.1%	2.4%	1.6%	73.0%

Project Stage		Pre-Application		Part I Submitted	Dropped	ICC Approved	Total
Data Type		With Data	Estimated	With Data	With Data	Estimated	
Energy Burden Reduction	Minimum	0.5%	0.7%	1.0%	0.8%	1.5%	0.5%
	Mean	7.4%	1.2%	6.3%	0.8%	1.5%	4.9%
	Maximum	26.8%	2.9%	36.4%	0.8%	1.5%	36.4%
Post-Solar Energy Burden	Minimum	1.5%	1.6%	1.6%	1.6%	0.1%	0.1%
	Mean	15.1%	2.9%	7.3%	1.6%	0.1%	7.8%
	Maximum	46.2%	7.6%	29.7%	1.6%	0.1%	46.2%

I. Grassroots Education Statistics

This section provides information on the grassroots education events completed from the initiation of the activity through mid-December 2019, as well as planned projects after that date.

Table II-44 displays the number of completed, scheduled, and total events by Grassroots Educator. The table shows that Sustain Rockford, the most active Grassroots Educator, completed 23 events, and Chicago Jobs Council only had one event. Most of the Grassroots Educators had between six and 15 events.

Table II-44
Grassroots Education Events by Educator

Grassroots Educator	Completed Events*	Scheduled Events*	Total Events
Sustain Rockford	19	4	23
Ecology Action Center	13	2	15
Faith in Place	15	0	15
Pilsen Environmental Rights and Reform Organization (PERRO)	14	0	14
Community Organizing and Family Issues (COFI)	12	0	12
Embarras River Basin Agency, Inc (ERBA)	11	1	12
C.E.F.S. Economic Opportunity Corporation (CEFS)	10	0	10
Prairie Rivers Network	7	0	7
People for Community Recovery (PCR)	5	1	6
Chicago Bungalow Association	4	0	4
Chicago Jobs Council	1	0	1
Total	111	8	119

* Completed and scheduled as of December 13, 2019.

Table II-45A displays the number of events by county. The table shows that no events were held in 79 of the 102 counties. While five counties had two events, only six counties had three or more events. Forty events were held in Cook County.

**Table II-45A
Grassroots Education Events by County – Summary Table**

Total # of Events	# of Counties	County Names
0	79	Adams, Alexander, Bond, Boone, Brown, Bureau, Calhoun, Carroll, Cass, Clinton, De Witt, DeKalb, DuPage, Edwards, Ford, Franklin, Fulton, Gallatin, Greene, Grundy, Hamilton, Hancock, Hardin, Henderson, Henry, Iroquois, Jackson, Jefferson, Jersey, Jo Daviess, Johnson, Kane, Kankakee, Kendall, Knox, La Salle, Lake, Lee, Livingston, Logan, Macon, Macoupin, Madison, Marion, Marshall, Mason, Massac, McDonough, McHenry, Menard, Mercer, Monroe, Morgan, Perry, Piatt, Pike, Pope, Pulaski, Putnam, Randolph, Richland, Rock Island, Saline, Sangamon, Schuyler, Scott, Stark, Stephenson, Union, Vermillion, Wabash, Warren, Washington, Wayne, White, Whiteside, Will, Williamson, Woodford
1	12	Clay, Coles, Crawford, Fayette, Jasper, Lawrence, Montgomery Moultrie, Ogle, Peoria, Shelby, Tazewell
2	5	Clark, Cumberland, Douglas, Edgar, Effingham
3	1	Christian
7	2	Champaign, St. Clair
15	1	McLean
25	1	Winnebago
40	1	Cook

Note: Illinois City/County correspondence obtained from <https://illinoisgenweb.org/historyproject/towns.html>.

Table II-45B displays the number of ILSFA-eligible households in counties where events were and were not held. The table shows that 59 percent of the ILSFA-eligible households live in counties where events were held and 41 percent live in counties where events were not held. The counties where GE events were held had a mean size of 47,231 ILSFA-eligible households compared to a mean of 9,692 ILSFA-eligible households in counties where no GE events were held.

**Table II-45B
ILSFA-Eligible Population in Counties where GE Events were Held**

Counties	Obs.	Number of ILSFA-Eligible Households								Eligible HH	
		Mean	Min	Percentile					Max	Total #	% of Eligible
				P10	P25	P50	P75	P90			
Had GE Events	23	47,231	1,458	2,157	2,667	4,239	27,008	42,239	823,208	1,086,322	59%
No GE Events	79	9,692	616	954	2,087	4,055	7,862	24,946	91,016	765,647	41%
Total	102	18,157	616	1,043	2,272	4,137	8,416	32,730	823,208	1,851,969	100%

Figure II-1 displays a map of the locations where the Grassroots Education events were held. The map shows that there were large areas in the western and southern parts of the state where no events were held.

Figure II-1
Locations of Grassroots Education Events

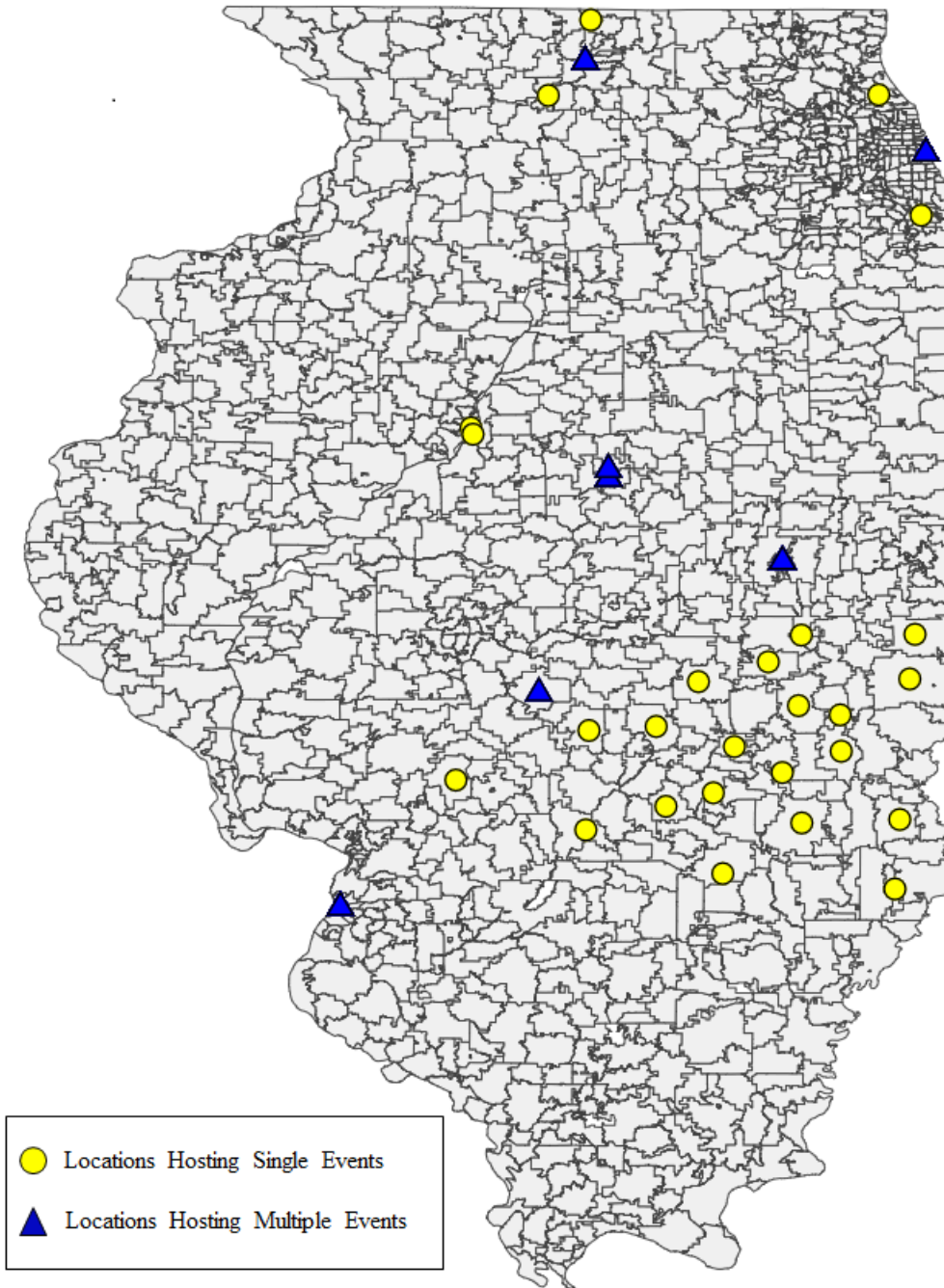


Table II-46 displays the number of attendees by Grassroots Educator. Overall, over 2,500 individuals attended. While there were events that had no attendees, the largest event had over 1,100 attendees. However, it is not clear how many of the event attendees participated in the Grassroots Education, as some of these were larger events where the Grassroots Education was only one component of the event.

Table II-46
Grassroots Education Events
Number of Attendees by Grassroots Educator

Grassroots Educator	Completed Events*	Number of Attendees			
		Min.	Mean	Max.	Total
C.E.F.S. Economic Opportunity Corporation (CEFS)	10	7	18	38	182
Chicago Bungalow Association	4	6	10	15	41
Chicago Jobs Council	1	25	25	25	25
Community Organizing and Family Issues (COFI)	12	15	97	262	1,161
Ecology Action Center	13	0	3	12	40
Embarras River Basin Agency, Inc (ERBA)	11	1	17	30	186
Faith in Place	15	10	27	65	405
Pilsen Environmental Rights and Reform Organization (PERRO)	13**	2	22	60	292
People for Community Recovery (PCR)	5	6	18	35	89
Prairie Rivers Network	7	1	12	35	84
Sustain Rockford	19	0	6	20	112
All Events	110	0	24	262	2,617

* Completed as of December 13, 2019.

** The number of attendees was not provided for one PERRO event held in August 2019.

Table II-47 displays the number of attendees by event type. Canvassing reached the most households, followed by tabling, but it is unclear how the number of attendees were counted.

Table II-47
Grassroots Education Events
Number of Attendees by Event Type

Event Type	Completed Events*	Number of Attendees			
		Min.	Mean	Max.	Total
1:1	2**	2	2	2	4
Canvassing	12	15	98	262	1,176
Neighborhood Tour	2	15	18	20	35
Networking	12	0	4	20	50

Event Type	Completed Events*	Number of Attendees			
		Min.	Mean	Max.	Total
Steering Committee	2	6	6	6	12
Tabling	5	12	32	60	160
Workshop***	71	0	16	65	1,133
Missing	4	7	12	20	47
All Events	110	0	24	262	2,617

* Completed as of December 13, 2019.

**The number of attendees was not provided for one PERRO 1:1 event held in August 2019.

*** “Workshop” includes workshops, community meetings, and house parties.

Table II-48 displays the number of cities where Grassroots Educators hosted events. While ERBA hosted events in 12 different cities, CEFS hosted events in nine cities, and Faith in Place hosted events in eight cities.

**Table II-48
Grassroots Education Events
Number of Different Cities Hosting Events by Grassroots Educator**

Grassroots Educator	Total Events	Number of Different Cities
C.E.F.S. Economic Opportunity Corporation (CEFS)	10	9
Chicago Bungalow Association	4	1
Chicago Jobs Council	1	1
Community Organizing and Family Issues (COFI)	12	2
Ecology Action Center	15	2
Embaras River Basin Agency, Inc (ERBA)	12	12
Faith in Place	15	8
Pilsen Environmental Rights and Reform Organization (PERRO)	14	1
People for Community Recovery (PCR)	6	1
Prairie Rivers Network	7	1
Sustain Rockford	23	2
All Events	119	33

Table II-49 displays the event types held by the Grassroots Educators. The table shows that all educators held workshops, two educators conducted canvassing, two conducted tabling, one did one-on-one sessions, one did a neighborhood tour, one did networking, and one had steering committee meetings.

**Table II-49
Grassroots Education Events
Event Type by Grassroots Educator**

Grassroots Educator	Total Events	Event Type						
		1:1	Canvassing	Neighborhood Tour	Networking	Steering Committee	Tabling	Workshop*
CEFS	10	0	0	0	0	0	0	10
Chicago Bungalow.	4	0	0	0	0	0	0	4
Chicago Jobs Council	1	0	0	0	0	0	0	1
COFI	12	0	10	0	0	0	0	2
Ecology Action Center	15	0	0	0	0	0	1	14
ERBA	12	0	0	0	0	0	0	12
Faith in Place	12**	0	0	0	0	0	0	12
PERRO	14	3	2	0	0	0	4	5
PCR	6	0	0	1	0	0	0	5
Prairie Rivers Network	7	0	0	0	0	0	0	7
Sustain Rockford	22**	0	0	1	12	2	0	7
All Events	115	3	12	2	12	2	5	79

* “Workshop” includes workshops, community meetings, and house parties.

** Event Type was not provided for three Faith in Place events and one Sustain Rockford event.

Table II-50 displays the discussion topics for the events. Events were most likely to cover DG, CS, and NP/PF programs. Other events covered AVs and job training.

**Table II-50
Grassroots Education Events
Discussion Topic by Grassroots Educator**

Grassroots Educator	Total Events	Discussion Topic					
		1-4 Distributed Generation	5+ Distributed Generation	Community Solar	Non-Profit / Public Facility	Approved Vendors	Job Training
CEFS	10	10	0	10	0	0	0
Chicago Bungalow Assoc.	4	3	0	4	0	1	2
Chicago Jobs Council	1	0	0	1	0	0	1
COFI	12	12	12	12	1	3	12
Ecology Action Center	15	15	15	15	14	13	0
ERBA	12	12	0	12	12	0	0
Faith in Place	15	15	2	14	14	5	12
PERRO	14	12	3	12	10	6	10

Grassroots Educator	Total Events	Discussion Topic					
		1-4 Distributed Generation	5+ Distributed Generation	Community Solar	Non-Profit / Public Facility	Approved Vendors	Job Training
PCR	6	5	0	2	0	0	2
Prairie Rivers Network	7	6	6	6	1	0	0
Sustain Rockford	23	16	16	11	22	3	5
All Events	119	106	54	99	74	31	44

III. Eligibility Assessment

This section provides a profile of households that are eligible for the Illinois Solar for All (ILSFA) Program using data from the American Community Survey (ACS). These data provide information on the characteristics of eligible households statewide and by county.

A. Methodology

The American Community Survey (ACS) data provide information on household characteristics, including income level and demographic characteristics. The statewide and county-level analyses were conducted using a constructed three-year average data file comprised of households surveyed in 2016, 2017, and 2018, the most recent three years of data available at the time of the analysis. These data represent the state of Illinois in 2018. Three years of data were used to provide a larger sample for analysis than would be available in the one-year file. The Environmental Justice (EJ) communities and Low-Income (LI) communities analyses used five-year ACS estimates for 2013 through 2017 for Census Block Groups and Census Tracts, respectively.

Households were considered eligible for ILSFA if they met the following criteria.

- At or below 80 percent of area median income (AMI), as defined in the ILSFA.
- Had electric service (a small number of households that reported no electric service were removed as shown in the following sections).
- Did not already use solar energy for heating.

These low-income cutoffs were developed at the time of ILSFA implementation and will be revised every five years. The 80 percent AMI applied used HUD guidelines from fiscal year 2017, adjusted for household size.

The ACS data used for this analysis provide information at the Public Use Microdata Area (PUMA) level. PUMAs are statistical geographic areas that are used in the ACS that contain 100,000 households or more to preserve the confidentiality of the respondents. The PUMAs provided in the ACS data do not always match up exactly with counties. This posed a challenge for identifying low-income households, as the 80 percent AMI is developed at the county-level. For PUMAs that contained multiple counties, the 80 percent AMI guideline for the PUMA was estimated as an average of the included county-level guidelines, weighted by the number of households in each included county.

An estimation technique was also used to approximate the service area of the electric utilities in Illinois. Each county was assigned to the electric utility that served the majority of the county, based on estimated square mileage and the number of customers served. For PUMAs containing counties assigned to more than one utility, utility-level estimates were obtained using the percent of the PUMA population in each utility. This technique does not provide a precise estimate of the characteristics in each utility's territory, as some counties are serviced by multiple utilities. Aggregate statistics were reported for electric co-ops, municipal utilities, and Mt. Carmel Public Utility.

LI communities are Census Tracts that are comprised of a majority (50 percent or greater) of low-income households. These communities were identified by Elevate Energy using 2012-2016 and 2013-2017 ACS data.

The analyses of EJ communities and LI communities required ACS data available at the Census Tract and Block Group level. The only ACS data available at this level are five-year Summary Tables that are pre-tabulated estimates provided by the Census Bureau. ACS Summary Tables on average household size and household income were used to approximate the number of ILSFA-eligible households in each Census Tract and Block Group. This approach is described in further detail where these results are presented later in this section. As different data were used for these analyses than for the rest of the state-level and county-level analyses, the resulting estimates may differ somewhat.

B. Statewide Analysis

This section provides an analysis of the characteristics of ILSFA-eligible households in Illinois.

Income and Program Eligibility

Table III-1A displays the percent of households in Illinois that were classified as having income below or above 80 percent of AMI. The table shows that 39 percent of all households in Illinois were at or below 80 percent Area Median Income, and were therefore income-eligible for the ILSFA.

**Table III-1A
Income Level
All Households**

Income Level	Number of Households	Percent of Households
At or below 80% AMI	1,885,023	39%
Above 80% AMI	2,946,836	61%
Total	4,831,859	100%

Source: 2016-2018 ACS

Table III-1B displays a comparison of 80 percent of AMI with 2017 and 2018 poverty guidelines and income. The table shows that 80 percent of AMI and income vary widely by county. It also provides the following statistics.

- 80 percent of AMI for four-person households is between \$47,100 and \$48,500 for 41 percent of Illinois counties, but these counties represent only eight percent of ILSFA-eligible households.
- 80 percent AMI for four-person households is between \$60,400 and \$68,000 for 11 percent of Illinois counties, and 67 percent of ILSFA-eligible households live in these counties.
- Four-person households that live in counties where 80 percent AMI is between \$60,400 and \$68,000 may have a poverty level of up to 246 to 276 percent.

**Table III-1B
Comparison of 80% of AMI, Income, and Poverty Level**

80% AMI 4-Person Households	Poverty Level Guidelines		Counties		ILSFA-Eligible Households		County Names
	2017	2019	#	%	#	%	
\$47,100 - \$48,500	191% -197%	183% - 188%	42	41%	152,023	8%	Alexander, Cass, Christian, Clark, Clay, Coles, Cumberland, Edgar, Edwards, Fayette, Franklin, Fulton, Gallatin, Greene, Hamilton, Hancock, Hardin, Henderson, Iroquois, Jackson, Jefferson, Johnson, Knox, Lawrence, Marion, Mason, Massac, Montgomery, Moultrie, Perry, Pike, Pope, Pulaski, Richland, Saline, Schuyler, Shelby, Stephenson, Union, Vermilion, Warren, Wayne
\$48,550 - \$50,150	197% -204%	189% - 195%	10	10%	108,861	6%	Adams, Boone, Carroll, Macon, McDonough, Wabash, White, Whiteside, Williamson, Winnebago
\$50,400 - \$52,550	205% -214%	196% - 204%	10	10%	60,330	3%	Bond, Bureau, Crawford, Jasper, Kankakee, La Salle, Logan, Macoupin, Randolph, Scott
\$52,650 - \$54,550	214% -222%	204% - 212%	9	9%	62,565	3%	Douglas, Effingham, Henry, Jo Daviess, Lee, Livingston, Mercer, Morgan, Rock Island
\$55,100 - \$57,300	224% -233%	214% - 223%	8	8%	56,137	3%	Brown, Champaign, De Witt, Ford, Ogle, Piatt, Putnam, Washington
\$58,000 - \$59,600	236% -242%	225% - 231%	12	12%	179,578	10%	Calhoun, Clinton, DeKalb, Jersey, Madison, Marshall, Monroe, Peoria, St. Clair, Stark, Tazewell, Woodford
\$60,400 - \$68,000	246% - 276%	235% - 264%	11	11%	1,232,475	67%	Cook, DuPage, Grundy, Kane, Kendall, Lake, McHenry, McLean, Menard, Sangamon, Will

Households were considered ineligible for the program if they did not have electric service. Table III-2 displays the reports on electric bills for low-income households (defined in the previous table). Households with no electric charges or that did not use electricity were classified as having no electric service. The table shows that 98 percent of low-income households had electric service. The majority of households with electric service directly paid their electric bill to a utility, and a small portion of these households paid for electricity as part of their rent. Households that have electric costs included in their rent are eligible for the ILSFA Program and may receive ILSFA benefits in the form of reduced rent or other credits from their landlord.

Table III-2
Receipt of Electric Bill
Households At or Below 80% of AMI

Receipt of Electric Bill	Eligible for ILSFA	Number of Households	Percent of Households
Direct Payment of Electric Bill	Yes	1,752,687	93%
Electric Bill Included in Rent	Yes	99,719	5%
No Charge/Electric Not Used	No	32,617	2%
Total	--	1,885,023	100%

Source: 2016-2018 ACS

Households that already used solar energy for heating were also considered ineligible for ILSFA. ACS data on household main heating fuel were used to identify these households. Table III-3 displays the main heating fuel for low-income households with electric service. The table shows that 73 percent of these households heated their homes with utility gas and 22 percent heated their homes with electricity. Overall, less than one percent of low-income households with electric service were ineligible for ILSFA due to the use of solar energy as the main heating fuel.

Table III-3
Main Heating Fuel
Households At or Below 80% of AMI with Electric Service

Heating Fuel Type	ILSFA-Eligible	Number of Households	Percent of Households
Electric	Yes	398,449	22%
Gas	Yes	1,356,272	73%
Solar	No	442	< 1%
Other / No Heating Fuel	Yes	97,243	5%
Total	--	1,852,406	100%

Source: 2016-2018 ACS

Table III-4 provides a summary of the reasons that households were sequentially characterized as ineligible for ILSFA in this analysis. The table shows that overall 38 percent of households in the state were eligible for ILSFA.

Table III-4
ILSFA-Eligibility Summary
All Households

Exclusion Reason	Number of Households	Percent of Households
Above 80% AMI	2,946,836	61%
No Electric Service	32,617	1%
Solar Heat	442	< 1%
Eligible for ILSFA	1,851,964	38%
Total	4,831,859	100%

Source: 2016-2018 ACS

Table III-5 compares ILSFA eligibility to Low-Income Home Energy Assistance Program (LIHEAP) and Illinois Home Weatherization Assistance Program (IHWAP) eligibility for households that had electric service and did not use solar heat. While income eligibility for LIHEAP and the state-funded IHWAP are at or below 150 percent of the Federal Poverty Level (FPL), income eligibility for the federally-funded IHWAP program is up to 200 percent of the FPL.

More than 99 percent of the households that are eligible for LIHEAP and the state-funded IHWAP programs have income at or below 80 percent of AMI. (There are five households out of close to 900,000 in the ACS sample that had 12 household members and where 80 percent of AMI was less than 150 percent of the poverty level.) Therefore, participation in these programs is used to provide income verification for the ILSFA. The relationship between 80 percent AMI and federally-funded IHWAP eligibility guidelines varies across the state. The table shows that 99 percent of households that are eligible for federal but not state-funded IHWAP are still eligible for the ILSFA.

Because the 80 percent of AMI guideline is usually much higher than the LIHEAP and IHWAP guidelines, 48 percent of ILSFA-eligible households have income at or below 150 percent of the FPL, 21 percent have income between 151 and 200 percent of the FPL, and 31 percent have income above 200 percent of the FPL.

Table III-5
LIHEAP, IHWAP, and ILSFA Eligibility
Electric Service Households without Solar

Federal Poverty Level	LIHEAP & IHWAP Program Eligibility	At or Below 80% AMI			Above 80% AMI			Total		
		# of HH	% of Total	% ILSFA-Eligible	# of HH	% of Total	% ILSFA-Eligible	# of HH	% of Total	% ILSFA-Eligible
≤150%	LIHEAP & IHWAP	892,180	48%	100%	5	< 1%	0%	892,185	19%	> 99%
151%-200%	Fed-Funded IHWAP	382,288	21%	100%	4,900	< 1%	0%	387,189	8%	99%
>200%	None	577,496	31%	100%	2,911,678	> 99%	0%	3,489,173	73%	17%
Total		1,851,964	100%	100%	100%	100%	0%	4,768,547	100%	39%

Source: 2016-2018 ACS

ILSFA requires that 25 percent of program incentives are located in EJ communities. Table III-6 displays the number and percent of households in EJ communities. While 25 percent of Census Block Groups in Illinois were designated as EJ communities, this represented 22 percent of households in the state.

Table III-6
Environmental Justice Communities
All Households

EJ Community	Number of Households	Percent of Households
In EJ Community	1,056,639	22%
Not in EJ Community	3,761,813	78%
Total	4,818,452	100%

Source: 2013-2017 ACS

Table III-7 displays the number and percent of households that were eligible for ILSFA, by EJ community designation. The following steps were used to estimate the number of ILSFA-eligible households in each Census Block Group.

1. ACS Summary Tables provided the average household size by Census Block Group.
2. The income-eligibility threshold for the Census Block Group was defined as 80 percent of AMI for the average household size computed in step #1.
3. ACS Summary Tables on annual household income by Census Block Group provided a count of the number of households in pre-set income categories. These data were used to estimate the number of households below the income-eligibility threshold developed in step #2.

4. The step #3 estimate was multiplied by 98 percent to account for households without electric service or that already used solar energy. This is the percentage of households that was estimated to be ineligible for those reasons in the statewide analysis.

Table III-7 shows that 61 percent of households in EJ communities were eligible for ILSFA (income and electricity usage characteristics), compared to 36 percent of households outside of EJ communities.

Table III-7
Households in Environmental Justice Communities
ILSFA-Eligibility

ILSFA-Eligibility	In EJ Community		Not in EJ Community	
	# of Households	% of Households	# of Households	% of Households
Eligible for ILSFA	645,145	61%	1,351,900	36%
Not Eligible for ILSFA	411,494	39%	2,409,913	64%
Total	1,056,639	100%	3,761,813	100%

Source: 2013-2017 ACS

Table III-8 shows that 32 percent of households in Illinois were in LI communities.

Table III-8
Low-Income Communities
All Households

LI Census Tract	Number of Households	Percent of Households
In LI Census Tract	1,548,343	32%
Not in LI Census Tract	3,270,109	68%
Total	4,818,452	100%

Source: 2013-2017 ACS

Table III-9 displays the number and percent of households in LI communities that were eligible for ILSFA. The method used to estimate the number of ILSFA-eligible households in EJ communities was also used for this estimate. The table shows that 61 percent of households in Low-Income Communities were eligible for ILSFA, compared to 32 percent of households that were not in Low-Income Communities.

Table III-9
Households in Low-Income Communities
ILSFA-Eligibility

ILSFA-Eligibility	In LI Census Tract		Not in LI Census Tract	
	Number of Households	Percent of Households	Number of Households	Percent of Households
Eligible for ILSFA	947,094	61%	1,052,533	32%
Not Eligible for ILSFA	601,249	39%	2,217,576	68%
Total	1,548,343	100%	3,270,109	100%

Source: 2013-2017 ACS

Other Housing Characteristics

Table III-10 displays the percent of ILSFA-eligible households that were owners and renters. The table shows that about half of eligible households were in each category.

Table III-10
Homeownership Status
ILSFA-Eligible Households

Homeownership Status	Number of Households	Percent of Households
Owned	870,585	47%
Rented	940,412	51%
Occupied without Payment of Rent	40,967	2%
Total	1,851,964	100%

Source: 2016-2018 ACS

Table III-11 shows the year the home was built for ILSFA-eligible households. Older housing units may be more likely to require roofing or other repairs before DG project installation. The table shows that 45 percent of ILSFA-eligible households were built before 1960, and nine percent of ILSFA-eligible households were built in 2000 or later.

Table III-11
Year Housing Unit Built
ILSFA-Eligible Households

Year Housing Unit Built	Number of Households	Percent of Households
Pre-1960	825,965	45%
1960 - 1979	522,382	28%
1980 - 1999	333,494	18%
Post-2000	170,124	9%
Total	1,851,964	100%

Source: 2016-2018 ACS

Table III-12 displays the housing unit type for ILSFA-eligible households. Multi-family buildings qualify for the DG sub-program if at least half of the households in the building are eligible, or if the property qualifies for certain housing programs. ILSFA-eligible households that live in non-qualifying multi-family buildings may still participate in the CS sub-program. The table shows that about half of eligible households lived in single-family homes, and 45 percent lived in multi-family buildings.

Table III-12
Housing Unit Type
ILSFA-Eligible Households

Unit Type	Number of Households	Percent of Households
Single-Family Detached	851,267	46%
Single-Family Attached	99,208	5%
Building with 2-9 Units	478,625	26%
Building with 10-19 Units	96,851	5%
Building with 20+ Units	259,653	14%
Mobile Home	65,521	4%
Boat, RV, or Van	839	< 1%
Total	1,851,964	100%

Source: 2016-2018 ACS

Table III-13 displays the language spoken at home for ILSFA-eligible households. The table shows that 26 percent of ILSFA-eligible households spoke a language other than English, and that Spanish was the most common language for these households. This table confirms the need for ILSFA outreach in multiple languages.

Table III-13
Language Spoken at Home
ILSFA-Eligible Households

Language	Number of Households	Percent of Households
English Only	1,372,861	74%
Spanish	285,673	15%
Indo-European	112,589	6%
Asian / Pacific Islander	52,309	3%
Other	28,532	2%
Total	1,851,964	100%

Source: 2016-2018 ACS

Electric Utilities and Costs

The following steps were used to calculate annual electric costs and group energy burden.

1. For each household in the sample, the ACS electric costs were annualized by multiplying the monthly costs by 12.
2. We computed the average annual household income and average annual electric costs across all households in the group of interest, for example all households in single-family homes with electric heat.
3. The mean group electric burden for the group of interest was calculated as follows.

$$\text{Group Energy Burden} = \frac{\text{Average Annual Electric Bill}}{\text{Average Annual Household Income}}$$

The mean group energy burden is used rather than the mean individual energy burden because of the data collection method. The mean individual energy burden would be calculated as shown below.

1. Calculate energy burden for each individual household as follows.

$$\text{Individual Energy Burden} = \frac{\text{Annual Electric Bill}}{\text{Annual Household Income}}$$

2. Calculate the mean individual energy burden across all households in the group of interest.

The mean individual energy burden analysis allows for a more detailed analysis of households with high energy burden. However, the individual energy burden cannot be calculated with the ACS data because electric costs are collected for one month for each household. Multiplying the one-month electric costs by 12 will yield an overestimate of costs and burdens for some customers and an underestimate for others.

An example illustrating the difference between these two calculations is shown in the table below. The table shows that the individual burden provides a greater weighting for the high-burden household and higher overall average energy burden.

Table III-14
Energy Burden Calculation Example

	Monthly Electric Costs	Annual Electric Costs	Annual Income	Group Burden	Individual Burden
Household 1	\$700	\$8,400	\$20,000		42%
Household 2	\$500	\$6,000	\$50,000		12%
Household 3	\$250	\$3,000	\$30,000		10%
Household 4	\$50	\$600	\$60,000		1%
Average	\$375	\$4,500	\$40,000	11%	16%

Tables III-15A displays the mean annual electric bill and group electric burden for ILSFA-eligible households, by household type. Table III-15A shows that the electric burden averaged five percent for ILSFA-eligible households. Both electric burden and electric costs were somewhat higher for single-family households than for multi-family households and were higher for single-family renters than for single-family owners. Electric burden and costs were highest for “Other” household types.

Table III-15A
Electric Burden and Electric Bills
ILSFA-Eligible Households

Electric Burden and Costs	Single-Family	Multi-Family	Other Housing Type	Total
Number of HH	938,823	747,674	65,789	1,752,287
Mean Annual Income	\$28,666	\$23,668	\$23,297	\$26,332
Mean Annual Elec Bill	\$1,562	\$1,004	\$1,842	\$1,334
Mean Electric Burden	5.5%	4.2%	7.9%	5.1%

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent. “Other” refers to Mobile Homes, Boats, RVs, or Vans.

II-15B
Electric Burden and Electric Bills
ILSFA-Eligible Households

Electric Burden and Costs	Single-Family Own Home	Single Family Rent Home	Multi-Family Own Home	Multi-Family Rent Home
Number of HH	700,215	214,367	119,971	616,674
Mean Annual Income	\$29,458	\$26,824	\$27,240	\$23,072
Mean Annual Elec Bill	\$1,512	\$1,709	\$1,013	\$1,002
Mean Electric Burden	5.1%	6.4%	3.7%	4.3%

Source: 2016-2018 ACS.

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent.

Table III-16 displays the mean annual electric bill and electric burden for ILSFA-eligible households, by heating type and household type. The table shows that single-family, electric heating households had group energy burden that averaged eight percent.

Table III-16
Electric Burden and Electric Bills
ILSFA-Eligible Households

Electric Burden and Costs	Non-Electric Heat				Electric Heat			
	Single-Family	Multi-Family	Other	Total	Single-Family	Multi-Family	Other	Total
Number of HH	837,204	505,992	49,134	1,392,330	101,619	241,682	16,655	359,956
Mean Annual Income	\$28,927	\$24,687	\$23,467	\$27,194	\$26,518	\$21,534	\$22,796	\$23,000
Mean Annual Elec Bill	\$1,495	\$937	\$1,613	\$1,296	\$2,114	\$1,144	\$2,515	\$1,481
Mean Electric Burden	5.2%	3.8%	6.9%	4.8%	8.0%	5.3%	11.0%	6.4%

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent. "Other" refers to Mobile Homes, Boats, RVs, or Vans.

Table III-17 provides an estimate of the number of households and ILSFA-eligible households by electric utility. The Other Electric Utility category includes electric coops, municipal utilities, and Mt. Carmel Public Utility. The percent of ILSFA-eligible households ranged from 37 percent to 41 percent. While 69 percent of ILSFA-eligible households are in ComEd's service territory, 26 percent are in Ameren's service territory, and only four percent of these households live in other territories.

**Table III-17
ILSFA-Eligibility, by Utility**

Utility	Number of Households	ILSFA-Eligible Households		% of ILSFA-Eligible Households in Each Utility's Territory
		#	%	
Ameren	1,171,079	477,718	41%	26%
ComEd	3,438,300	1,284,545	37%	69%
Mid-American	60,551	24,946	41%	1%
Other Electric Utility	161,930	64,755	40%	3%
Illinois	4,831,860	1,851,964	38%	100%

Source: 2016-2018 ACS

C. County Level Analysis

This section provides an analysis of ILSFA-eligible customers by county to assess how the characteristics of these customers vary across the state. Results were calculated individually for counties that directly aligned with a PUMA(s), and jointly for counties that shared a PUMA.

Income and Program Eligibility

Table III-18A displays the number and percent of households that were eligible for the ILSFA in each county or group of counties. The table also shows the percent of households that met each criterion for eligibility. While 38 percent of households in Illinois were eligible for the ILSFA Program, the percent eligible ranged from 27 percent in DuPage County to 46 percent Franklin, Jackson, Perry, and Williamson Counties. For a majority of counties, at least 30 percent of households were eligible for ILSFA.

**Table III-18A
ILSFA-Eligibility, by County
All Households**

County	Below 80% AMI	Below 80% AMI, Has Electric Service	Eligible for ILSFA (Below 80% AMI, Has Elec Service, Does Not Use Solar)	
			Number	Percent
Illinois	39%	38%	4,831,539	38%
Adams, Brown, Mason, Pike, Schuyler	38%	37%	16,447	37%
Alexander, Edwards, Gallatin, Hamilton, Hardin, Johnson, Massac, Pope, Pulaski, Saline, Union, Wabash, White	45%	44%	23,146	44%
Bond, Clinton, Effingham, Fayette, Montgomery	38%	37%	19,871	37%
Boone, Winnebago	37%	37%	49,141	37%
Bureau, Knox, Marshall, Putnam, Stark, Woodford	39%	38%	22,112	38%

County	Below 80% AMI	Below 80% AMI, Has Electric Service	Eligible for ILSFA (Below 80% AMI, Has Elec Service, Does Not Use Solar)	
			Number	Percent
Calhoun, Cass, Greene, Jersey, Macoupin, Morgan, Scott	40%	39%	21,492	39%
Carroll, Jo Daviess, Lee, Whiteside	36%	35%	18,410	35%
Champaign	44%	44%	36,464	44%
Christian, De Witt, Logan, Menard, Moultrie, Piatt, Shelby	38%	37%	21,563	37%
Clark, Clay, Crawford, Jasper, Lawrence, Richland, Wayne	41%	40%	17,104	40%
Coles, Cumberland, Douglas, Edgar	42%	40%	16,252	40%
Cook	43%	42%	823,208	42%
DeKalb	40%	40%	15,155	40%
DuPage	27%	27%	91,016	27%
Ford, Iroquois, Livingston, Vermilion	42%	42%	26,297	42%
Franklin, Jackson, Perry, Williamson	47%	46%	34,840	46%
Fulton, Hancock, Henderson, Henry, McDonough, Mercer, Warren	39%	39%	26,474	39%
Grundy, Kendall	30%	30%	18,072	30%
Jefferson, Marion, Monroe, Randolph, Washington	39%	39%	24,326	39%
Kane	35%	35%	62,860	35%
Kankakee	38%	37%	14,774	37%
La Salle	38%	38%	16,824	38%
Lake	31%	31%	75,930	31%
Macon	41%	41%	17,823	41%
Madison	41%	41%	43,529	41%
McHenry	29%	29%	32,730	29%
McLean	42%	41%	27,008	41%
Ogle, Stephenson	41%	40%	16,336	40%
Peoria	44%	42%	30,519	42%
Rock Island	42%	41%	24,946	41%
Sangamon	41%	40%	33,130	40%
St. Clair	46%	45%	46,876	45%
Tazewell	39%	38%	20,694	38%
Will	29%	29%	66,595	29%

Source: 2016-2018 ACS

Statistics in the remainder of tables in this section were calculated at the PUMA level (as shown above) if there were multiple counties in a PUMA. The PUMA-level statistics were then assigned to each county within the PUMA. This could obscure differences between counties within one PUMA.

Table III-18B provides a summary of the percent of ILSFA-eligible households in each county. The table shows that between 35 and 40 percent of households were eligible for ILSFA in the majority of counties. Only seven counties had less than 35 percent of households that were ILSFA-eligible, and only five counties had more than 45 percent that were ILSFA-eligible.

**Table III-18B
Summary of ILSFA-Eligibility, by County
All Households**

ILSFA-Eligible	# of Counties	% of Counties	County Names
< 35%	7	7%	DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will
35%-40%	60	59%	Adams, Bond, Boone, Brown, Bureau, Calhoun, Carroll, Cass, Christian, Clark, Clay, Clinton, Crawford, De Witt, DeKalb, Effingham, Fayette, Fulton, Greene, Hancock, Henderson, Henry, Jasper, Jefferson, Jersey, Jo Daviess, Kankakee, Knox, La Salle, Lawrence, Lee, Logan, Macoupin, Marion, Marshall, Mason, McDonough, Menard, Mercer, Monroe, Montgomery, Morgan, Moultrie, Piatt, Pike, Putnam, Randolph, Richland, Sangamon, Schuyler, Scott, Shelby, Stark, Tazewell, Warren, Washington, Wayne, Whiteside, Winnebago, Woodford
41%-45%	30	29%	Alexander, Champaign, Coles, Cook, Cumberland, Douglas, Edgar, Edwards, Ford, Gallatin, Hamilton, Hardin, Iroquois, Johnson, Livingston, Macon, Madison, Massac, McLean, Ogle, Peoria, Pope, Pulaski, Rock Island, Saline, Stephenson, Union, Vermilion, Wabash, White
> 45%	5	5%	Franklin, Jackson, Perry, St. Clair, Williamson

Source: 2016-2018 ACS

Table III-18C displays the distribution of the percent of ILSFA-eligible households in each county. The table shows that at least 27 percent were eligible in each county or group of counties. At most, 46 percent were eligible in each county or group of counties. The percent eligible was above 44 percent in ten percent of Illinois counties.

**Table III-18C
Distribution of ILSFA-Eligibility, by County**

Number of Counties	Percent ILSFA-Eligible							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	39%	27%	35%	37%	39%	41%	44%	46%

Source: 2016-2018 ACS

Table III-19A provides a summary of the percent of households that were at or below 200 percent of the FPL, of those households that had electric service and did not use solar heat. The table shows that 26 to 35 percent of these households were at or below 200 percent of the FPL in a majority of counties.

**Table III-19A
LIHEAP and IHWAP Eligibility, by County
Electric Service Households with No Solar**

≤ 200% FPL	# of Counties	% of Counties	County Names
≤ 25%	8	8%	DuPage, Grundy, Kane, Kendall, Lake, McHenry, Tazewell, Will
26%-30%	39	38%	Adams, Bond, Brown, Bureau, Carroll, Christian, Clinton, Cook, De Witt, DeKalb, Effingham, Fayette, Jefferson, Jo Daviess, Kankakee, Knox, La Salle, Lee, Logan, Madison, Marion, Marshall, Mason, McLean, Menard, Monroe, Montgomery, Moultrie, Piatt, Pike, Putnam, Randolph, Sangamon, Schuyler, Shelby, Stark, Washington, Whiteside, Woodford
31%-35%	38	37%	Boone, Calhoun, Cass, Champaign, Clark, Clay, Coles, Crawford, Cumberland, Douglas, Edgar, Ford, Fulton, Greene, Hancock, Henderson, Henry, Iroquois, Jasper, Jersey, Lawrence, Livingston, Macon, Macoupin, McDonough, Mercer, Morgan, Ogle, Peoria, Richland, Rock Island, Scott, St. Clair, Stephenson, Vermilion, Warren, Wayne, Winnebago
> 35%	17	17%	Alexander, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Johnson, Massac, Perry, Pope, Pulaski, Saline, Union, Wabash, White, Williamson

Source: 2016-2018 ACS

Table III-19B displays the distribution of the percent of households at or below 200 percent of the FPL in each county, for households with electric service that did not use solar heat. The table shows that the mean percent at or below 200 percent of the FPL in the county or group of counties was 31 percent. Less than 34 percent had income at or below 200 percent of the FPL in 75 percent of the counties in Illinois, and less than 26 percent had income at or below 200 percent of the FPL in ten percent of Illinois counties.

**Table III-19B
Distribution of Percent of Households ≤ 200% FPL , by County
Electric Service Households with No Solar**

Observations	Percent ≤ 200% FPL Distribution							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	31%	16%	26%	28%	31%	34%	38%	39%

Source: 2016-2018 ACS

Other Household Characteristics

Table III-20A provides a summary of the percent of ILSFA-eligible households that used electricity as their main heating fuel. The table shows that more than 40 percent of ILSFA-eligible households used electric heat in 18 percent of Illinois counties, and less than 30 percent of ILSFA-eligible households used electric heat in 70 percent of Illinois counties.

**Table III-20A
Electric Heating Households, by County
ILSFA-Eligible Households**

Elec Heat	# of Counties	% of Counties	County Names
< 20%	23	23%	Boone, Carroll, Christian, Cook, De Witt, DuPage, Grundy, Jo Daviess, Kane, Kendall, La Salle, Lake, Lee, Logan, McHenry, Menard, Moultrie, Piatt, Rock Island, Shelby, Whiteside, Will, Winnebago
20%-29%	48	47%	Adams, Bond, Brown, Bureau, Calhoun, Cass, Clark, Clay, Clinton, Crawford, Effingham, Fayette, Ford, Fulton, Greene, Hancock, Henderson, Henry, Iroquois, Jasper, Jersey, Kankakee, Knox, Lawrence, Livingston, Macon, Macoupin, Marshall, Mason, McDonough, Mercer, Montgomery, Morgan, Ogle, Peoria, Pike, Putnam, Richland, Sangamon, Schuyler, Scott, Stark, Stephenson, Tazewell, Vermilion, Warren, Wayne, Woodford
30%-39%	13	13%	Coles, Cumberland, DeKalb, Douglas, Edgar, Jefferson, Madison, Marion, McLean, Monroe, Randolph, St. Clair, Washington
≥ 40%	18	18%	Alexander, Champaign, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Johnson, Massac, Perry, Pope, Pulaski, Saline, Union, Wabash, White, Williamson

Source: 2016-2018 ACS

Table III-20B displays the distribution of the percent of ILSFA-eligible households that used electricity as their main heating fuel in each county. The table shows that 29 percent of ILSFA-eligible households used electricity as their main heating fuel in the average county. Less than 27 percent used electric heat in half of Illinois counties, and more than 41 percent used electric heat in only ten percent of Illinois counties.

**Table III-20B
Distribution of Percent of ILSFA-Eligible Households with Electric Heat, by County**

Observations	Percent with Electric Heat							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	29%	12%	18%	20%	27%	34%	41%	56%

Source: 2016-2018 ACS

Table III-21A provides a summary of the percent of ILSFA-eligible households that owned their homes in each county. More than 60 percent of ILSFA-eligible households owned their

homes in 33 percent of Illinois counties, and less than 55 percent of ILSFA-eligible households owned their homes in 25 percent of Illinois counties.

**Table III-21A
Home Ownership Status, by County
ILSFA-Eligible Households**

Own Home	# of Counties	% of Counties	County Names
< 55%	26	25%	Boone, Champaign, Coles, Cook, Cumberland, DeKalb, Douglas, DuPage, Edgar, Franklin, Jackson, Kane, Kankakee, Lake, Macon, Madison, McLean, Ogle, Peoria, Perry, Rock Island, Sangamon, St. Clair, Stephenson, Williamson, Winnebago
55%-60%	42	41%	Adams, Bond, Brown, Bureau, Calhoun, Cass, Clinton, Effingham, Fayette, Ford, Fulton, Greene, Hancock, Henderson, Henry, Iroquois, Jefferson, Jersey, Knox, La Salle, Livingston, Macoupin, Marion, Marshall, Mason, McDonough, McHenry, Mercer, Monroe, Montgomery, Morgan, Pike, Putnam, Randolph, Schuyler, Scott, Stark, Tazewell, Vermilion, Warren, Washington, Woodford
> 60%	34	33%	Alexander, Carroll, Christian, Clark, Clay, Crawford, De Witt, Edwards, Gallatin, Grundy, Hamilton, Hardin, Jasper, Jo Daviess, Johnson, Kendall, Lawrence, Lee, Logan, Massac, Menard, Moultrie, Piatt, Pope, Pulaski, Richland, Saline, Shelby, Union, Wabash, Wayne, White, Whiteside, Will

Source: 2016-2018 ACS

Table III-21B displays the distribution of the percent of ILSFA-eligible households that own their home in each county. The table shows that at least 28 percent of ILSFA-eligible households owned their own home in all Illinois counties, and more than 61 percent owned their home in 25 percent of counties.

**Table III-21B
Distribution of Percent of ILSFA-Eligible Households that Own Home, by County**

Observations	Home Ownership Distribution							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	57%	28%	46%	54%	59%	61%	64%	64%

Source: 2016-2018 ACS

Table III-22A provides a summary of the percent of ILSFA-eligible households that lived in single-family homes in each county. In a majority of counties, at least 60 percent of households lived in single-family homes. In Grundy and Kendall counties, more than 75 percent of households lived in single-family homes. More than 70 percent of ILSFA-eligible households lived in single-family homes in 44 counties.

Table III-22A
Housing Unit Type, by County
ILSFA-Eligible Households

Single-Family	# of Counties	% of Counties	County Names
< 60%	12	12%	Champaign, Cook, DeKalb, DuPage, Franklin, Jackson, Kankakee, Lake, McLean, Perry, St. Clair, Williamson
60%-65%	34	33%	Alexander, Bond, Boone, Clinton, Coles, Cumberland, Douglas, Edgar, Edwards, Effingham, Fayette, Gallatin, Hamilton, Hardin, Jefferson, Johnson, Kane, Marion, Massac, Monroe, Montgomery, Ogle, Pope, Pulaski, Randolph, Rock Island, Saline, Sangamon, Stephenson, Union, Wabash, Washington, White, Winnebago
66%-70%	12	12%	Clark, Clay, Crawford, Jasper, La Salle, Lawrence, Macon, Madison, McHenry, Peoria, Richland, Wayne
71%-75%	42	41%	Adams, Brown, Bureau, Calhoun, Carroll, Cass, Christian, De Witt, Ford, Fulton, Greene, Hancock, Henderson, Henry, Iroquois, Jersey, Jo Daviess, Knox, Lee, Livingston, Logan, Macoupin, Marshall, Mason, McDonough, Menard, Mercer, Morgan, Moultrie, Piatt, Pike, Putnam, Schuyler, Scott, Shelby, Stark, Tazewell, Vermilion, Warren, Whiteside, Will, Woodford
> 75%	2	2%	Grundy, Kendall

Source: 2016-2018 ACS

Table III-22B displays the distribution of ILSFA-eligible households that lived in single-family units in each county. The table shows that more than 69 percent of ILSFA-eligible households lived in single-family units in half of Illinois counties, and more than 74 percent lived in single-family units in ten percent of counties.

Table III-22B
Distribution of Percent of ILSFA-Eligible Households in Single-Family Units, by County

Observations	Percent in Single-Family Units Distribution							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	67%	35%	60%	63%	69%	71%	74%	77%

Source: 2016-2018 ACS

Table III-23A provides a summary of the percent of ILSFA-eligible households that did not speak English at home in each county. The percent of ILSFA-eligible households that did not speak English at home was greater than 15 percent in 13 counties.

**Table III-23A
Language Spoken at Home, by County
ILSFA-Eligible Households**

Non-English Language Spoken	# of Counties	% of Counties	County Names
< 5%	44	43%	Adams, Bond, Brown, Bureau, Christian, Clark, Clay, Clinton, Crawford, De Witt, Effingham, Fayette, Fulton, Hancock, Henderson, Henry, Jasper, Jefferson, Knox, Lawrence, Logan, Macon, Marion, Marshall, Mason, McDonough, Menard, Mercer, Monroe, Montgomery, Moultrie, Piatt, Pike, Putnam, Randolph, Richland, Schuyler, Shelby, Stark, Tazewell, Warren, Washington, Wayne, Woodford
5% – 10%	44	43%	Alexander, Calhoun, Carroll, Cass, Coles, Cumberland, Douglas, Edgar, Edwards, Ford, Franklin, Gallatin, Greene, Hamilton, Hardin, Iroquois, Jackson, Jersey, Jo Daviess, Johnson, La Salle, Lee, Livingston, Macoupin, Madison, Massac, McLean, Morgan, Ogle, Peoria, Perry, Pope, Pulaski, Saline, Sangamon, Scott, St. Clair, Stephenson, Union, Vermilion, Wabash, White, Whiteside, Williamson
11% – 15%	1	1%	Kankakee
> 15%	13	13%	Boone, Champaign, Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Rock Island, Will, Winnebago

Source: 2016-2018 ACS

Table III-23B displays the distribution of the percent of ILSFA-eligible households that did not speak English at home in each county. The table shows that more than 19 percent of ILSFA-eligible households did not speak English in ten percent of Illinois counties. On average, seven percent of ILSFA-eligible households did not speak English.

**Table III-23B
Distribution of Percent of ILSFA-Eligible Households That Do Not Speak English, by County**

Observations	Percent That Do Not Speak English Distribution							
	Mean	Min	Percentile					Max
			10	25	50	75	90	
102	7%	2%	3%	3%	5%	7%	19%	38%

Source: 2016-2018 ACS

Electric Costs and Burden

Table III-24A provides a summary of the mean annual electric bill for ILSFA-eligible households in each county, by whether households use electricity for heating. The mean annual electric bill for ILSFA-eligible households was more than \$2,000 for those that used electric heat in 29 percent of the counties and was more than \$1,750 for those that did not use electric heat in 30 percent of the counties.

Table III-24A
Electric Costs, by County
ILSFA-Eligible Households

Mean Electric Bill		# of Counties	% of Counties	County Names
Electric Heat	< \$1,500	17	17%	Boone, Champaign, Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, McLean, Ogle, Rock Island, Stephenson, Tazewell, Will, Winnebago
	\$1,501-\$1,750	14	14%	Bureau, Carroll, Jo Daviess, Kankakee, Knox, La Salle, Lee, Macon, Marshall, Peoria, Putnam, Stark, Whiteside, Woodford
	\$1,751-\$2,000	42	41%	Adams, Bond, Brown, Calhoun, Cass, Christian, Clinton, Coles, Cumberland, De Witt, Douglas, Edgar, Effingham, Fayette, Ford, Fulton, Greene, Hancock, Henderson, Henry, Iroquois, Jersey, Livingston, Logan, Macoupin, Madison, Mason, McDonough, Menard, Mercer, Montgomery, Morgan, Moultrie, Piatt, Pike, Sangamon, Schuyler, Scott, Shelby, St. Clair, Vermilion, Warren
	\$2,001-\$2,250	22	22%	Alexander, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Jefferson, Johnson, Marion, Massac, Monroe, Perry, Pope, Pulaski, Randolph, Saline, Union, Wabash, Washington, White, Williamson
	> \$2,250	7	7%	Clark, Clay, Crawford, Jasper, Lawrence, Richland, Wayne
Mean Electric Bill		# of Counties	% of Counties	County Names
Non-Electric Heat	< \$1,500	20	20%	Boone, Carroll, Cook, DeKalb, DuPage, Grundy, Jo Daviess, Kane, Kankakee, Kendall, La Salle, Lake, Lee, McHenry, McLean, Ogle, Stephenson, Whiteside, Will, Winnebago
	\$1,501-\$1,750	51	50%	Alexander, Bond, Bureau, Champaign, Clark, Clay, Clinton, Coles, Crawford, Cumberland, Douglas, Edgar, Edwards, Effingham, Fayette, Ford, Fulton, Gallatin, Hamilton, Hancock, Hardin, Henderson, Henry, Iroquois, Jasper, Johnson, Knox, Lawrence, Livingston, Marshall, Massac, McDonough, Mercer, Montgomery, Peoria, Pope, Pulaski, Putnam, Richland, Rock Island, Saline, Sangamon, Stark, Tazewell, Union, Vermilion, Wabash, Warren, Wayne, White, Woodford
	\$1,751-\$2,000	30	29%	Adams, Brown, Calhoun, Cass, Christian, De Witt, Franklin, Greene, Jackson, Jefferson, Jersey, Logan, Macon, Macoupin, Madison, Marion, Mason, Menard, Monroe, Morgan, Moultrie, Perry, Piatt, Pike, Randolph, Schuyler, Scott, Shelby, Washington, Williamson
	> \$2,000	1	1%	St. Clair

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent.

Table III-24B displays the distribution of the mean annual electric bill for ILSFA-eligible households in each county, by heating fuel type. The table shows that the average electric bill was more than \$2,130 for ILSFA-eligible households that used electric heat in ten percent of IL counties and more than \$1,907 for ILSFA-eligible households that did not use electric heat in ten percent of IL counties.

Table III-24B
Distribution of Annual Electric Bill for ILSFA-Eligible Households, by County

Heating Fuel Type	Obs.	Annual Electric Bill Distribution							
		Mean	Min	Percentile					Max
				10	25	50	75	90	
Electric	102	\$1,832	\$1,096	\$1,399	\$1,703	\$1,853	\$2,069	\$2,130	\$2,429
Non-Electric	102	\$1,670	\$1,085	\$1,312	\$1,672	\$1,691	\$1,794	\$1,907	\$2,077

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent.

Table III-25A provides a summary of the electric burden for ILSFA-eligible households in each county, by heating fuel type. The table shows that the mean electric burden for ILSFA-eligible households with electric heat was more than ten percent in 11 percent of IL counties and the mean electric burden for ILSFA-eligible households with non-electric heat was more than eight percent in 11 percent of IL counties.

Table III-25A
Electric Burden, by County
ILSFA-Eligible Households

ILSFA-Eligible Households Electric Burden	# of Counties	% of Counties	County Names	
Electric Heat	< 6%	11	11%	Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, McLean, Tazewell, Will
	6%-8%	19	19%	Boone, Bureau, Carroll, Champaign, Jo Daviess, Kankakee, Knox, Lee, Madison, Marshall, Ogle, Peoria, Putnam, Rock Island, Stark, Stephenson, Whiteside, Winnebago, Woodford
	8.1%-10%	61	60%	Adams, Alexander, Bond, Brown, Calhoun, Cass, Christian, Clinton, Coles, Cumberland, De Witt, Douglas, Edgar, Edwards, Effingham, Fayette, Ford, Fulton, Gallatin, Greene, Hamilton, Hancock, Hardin, Henderson, Henry, Iroquois, Jefferson, Jersey, Johnson, La Salle, Livingston, Logan, Macon, Macoupin, Marion, Mason, Massac, McDonough, Menard, Mercer, Monroe, Montgomery, Morgan, Moultrie, Piatt, Pike, Pope, Pulaski, Randolph, Saline, Sangamon, Schuyler, Scott, Shelby, St. Clair, Union, Vermilion, Wabash, Warren, Washington, White
	> 10%	11	11%	Clark, Clay, Crawford, Franklin, Jackson, Jasper, Lawrence, Perry, Richland, Wayne, Williamson

ILSFA-Eligible Households Electric Burden		# of Counties	% of Counties	County Names
Non-Electric Heat	< 6%	22	22%	Boone, Carroll, Cook, DeKalb, DuPage, Grundy, Jo Daviess, Kane, Kankakee, Kendall, La Salle, Lake, Lee, McHenry, McLean, Ogle, Sangamon, Stephenson, Tazewell, Whiteside, Will, Winnebago
	6%-7%	9	9%	Bureau, Champaign, Knox, Marshall, Peoria, Putnam, Rock Island, Stark, Woodford
	7.1%-8%	60	59%	Alexander, Bond, Calhoun, Cass, Christian, Clark, Clay, Clinton, Coles, Crawford, Cumberland, De Witt, Douglas, Edgar, Edwards, Effingham, Fayette, Ford, Fulton, Gallatin, Greene, Hamilton, Hancock, Hardin, Henderson, Henry, Iroquois, Jasper, Jefferson, Jersey, Johnson, Lawrence, Livingston, Logan, Macoupin, Madison, Marion, Massac, McDonough, Menard, Mercer, Monroe, Montgomery, Morgan, Moultrie, Piatt, Pope, Pulaski, Randolph, Richland, Saline, Scott, Shelby, Union, Vermilion, Wabash, Warren, Washington, Wayne, White
	> 8%	11	11%	Adams, Brown, Franklin, Jackson, Macon, Mason, Perry, Pike, Schuyler, St. Clair, Williamson

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent.

Table III-25B displays the distribution of the electric burden for ILSFA-eligible households in each county, by heating fuel type. Electric burden for electric heating households averaged more than 10.2 percent in ten percent of Illinois counties, and electric burden for electric non-heating households averaged more than eight percent in ten percent of Illinois counties.

Table III-25B
Distribution of Electric Burden for ILSFA-Eligible Households, by County

Heating Fuel Type	Obs.	Electric Burden Distribution							
		Mean	Min	Percentile					Max
				10	25	50	75	90	
Electric	102	8.6%	4.0%	5.5%	7.9%	8.6%	10.0%	10.2%	10.8%
Non-Electric	102	7.0%	3.7%	5.2%	7.0%	7.3%	7.6%	8.0%	9.1%

Source: 2016-2018 ACS

Note: 99,669 households were excluded from this analysis because their electric bill was included in their rent.

IV. Approved Vendor Feedback

APPRISE conducted telephone interviews with 22 of ILSFA’s 30 Approved Vendors (AVs) approved as of November 2019. These interviews assessed vendors’ initial experiences with the ILSFA Program.

This section provides information on the AVs’ views and opinions. Statements that were made by the AVs and that are reported on in this section may include suggestions that are inconsistent with the statutory requirements of the ILSFA and/or the ICC approved program design. Additionally, recommendations in this section are those made by the AVs, and may not represent the opinions of APPRISE or the IPA.

A. Methodology

This section describes the sample selection and the interview implementation.

The 30 Approved Vendors were stratified by several characteristics for selection. There were an additional six vendors that were excluded from the selection process because they were not approved (i.e. “Under Review,” “Rejected,” or “Cancelled”) and/or were Aggregators or Aggregator Designees.²⁹

For the remaining 30 vendors, the preliminary stratum was whether they had submitted projects and had selected projects in program years 2018-2019 and 2019-2020. The vendors were then further stratified by submitted project type, Minority/Women-Owned Business Enterprise (MWBE) status, and whether they resubmitted projects from year one in year two.

Table IV-1 furnishes information on the sample stratification and selection. The table shows that the selected sample and the interviewed sample include vendors from each of the strata present in the sample frame.

**Table IV-1
Sample Stratification and Selection**

Characteristic	Sample Frame	Selected Sample	Completed Interviews
Not Approved Vendor ¹	6	0	0
Submitted Projects & Had Selected Projects	9	9	9
Submitted Only NP/PF Projects	2	2	2
Submitted Only CS Projects	3	3	3
Submitted CS and DG Projects	1	1	1

²⁹ There was only one approved Aggregator and one approved Aggregator Designee. They will be targeted for interviews in the next round of evaluation.

Characteristic	Sample Frame	Selected Sample	Completed Interviews
Submitted NP/PF and CS Projects	3	3	3
MWBE	0	0	0
Not MWBE ²	9	9	9
Resubmitted Projects	4	4	4
Did Not Resubmit Projects	5	5	5
Submitted Projects, No Selected Projects	13	9	9
Submitted Only NP/PF Projects	5	4	4
Submitted Only DG Projects	1	1	1
Submitted Only CS Projects	6	3	3
Submitted NP/PF and CS Projects	1	1	1
MWBE	2	2	2
Not MWBE ²	11	7	7
Resubmitted Projects	5	4	4
Did Not Resubmit Projects	8	5	5
Did Not Submit Any Projects	8	5	4
MWBE	2	2	2
Not MWBE ²	6	3	2
Total Number of Approved Vendors	30	23	22

¹“Not Approved Vendor” includes Aggregators, Aggregator Designees, and AVs that were rejected, cancelled, or under review at the time of sample selection. ²“Not MWBE” includes vendors for which no MWBE information was provided.

The following procedures were used to implement the interviews.

- Vendors were contacted via phone and email to set up an interview. Most vendors responded after the first email and/or phone contact attempt.
- Up to four additional contact attempts were made via phone and up to three additional contact attempts were made via email to vendors that did not respond to the first attempt. Elevate Energy also sent an email to vendors that did not respond to APPRISE’s initial contact.
- Interviews were completed between November 19, 2019 and December 9, 2019.
- The interview length ranged from 17 to 64 minutes. Half of the interviews were 45 minutes or longer, and the average interview length was about 42 minutes.
- Interview summaries were sent to each organization for review and editing. Additional follow-up questions were sometimes included in these emails.

APPRISE initially selected a sample of 20 vendors, but an additional three vendors were selected during survey implementation to ensure that a total of at least 20 interviews were completed. Ultimately, interviews were conducted with 22 of the 23 selected vendors. The 23rd vendor in the selected sample did not respond to any contact attempts.

B. Interview Findings

Findings from the interviews are summarized within the following topic categories.

- Vendor and Staff Background
- Approved Vendor Registration
- Project Submission
- Project Selection
- Income Verification
- Project Submission and Selection Recommendations
- Future Projects
- ILSFA Training and Resources
- Stakeholder Outreach and Feedback
- Grassroots Education

Vendor and Staff Background

Generally, interviews were completed by one respondent from each company. However, there was one company that included two respondents and one company that included three respondents.

Interviewees held various titles at their companies. Twelve of the 25 respondents were Principals (Owners, Presidents, Founders, or Partners). Other interviewees included the Technology Director, Executive Assistant, and Utility Policy Research Specialist.

Interviewees also had varying responsibilities at their companies. The most common responsibility, reported by 13 respondents, was project development and/or project oversight. The next most common response, reported by eight interviewees, was general company oversight. Other interviewee responsibilities included liaising with utility and rebate programs and leading community engagement initiatives.

The interviewee from all but one of the interviewed vendors had primary or shared responsibility for submitting the Approved Vendor registration, and all interviewees had primary or shared responsibility for submitting projects to the ILSFA Program.

Approved Vendor Registration

Approved Vendors were asked questions to assess their registration experience overall, the assistance they received during Approved Vendor registration, and their recommendations for the registration process. This section summarizes those findings.

AV Registration Experience

Vendors were asked how easy or difficult they found the registration process, and 15 of the 22 vendors reported that the process was easy or somewhat easy.

Table IV-2
Approved Vendor Registration Difficulty

Registration Difficulty	Number of Approved Vendors
Difficult	4
Somewhat Difficult	2
Neither Easy nor Difficult	1
Somewhat Easy	1
Easy	14
Total	22

Vendors provided the following additional detail about the difficulty of registration.

- The registration process was easy because the registration questions were released before registration opened, so vendors were able to review the questions ahead of time.
- The registration process was straightforward but difficult due to the volume of information required, including affidavits and requests for additional information from Elevate. Though collecting this information is necessary, the volume of information required could be a barrier to participation.

Twelve vendors reported specific areas of difficulty with AV Registration.

Table IV-3
Vendors Identified Confusing or Challenging Aspects of Registration

Difficult Registration Areas Identified	Number of Approved Vendors
Specified Areas	12
No Aspects Identified	10
Total	22

Details AVs provided about these areas of difficulty are described below and summarized in Table IV-4.

- *Unclear Requirements*
 - Two vendors were initially unaware that they had to register through the Adjustable Block Program (ABP) before registering for the ILSFA Program. One of these vendors noted that Elevate has taken steps to make this requirement clearer.
 - Elevate asked the vendor to provide an additional certification of their minority status that was not requested in any of the program documentation.

- The vendor thought the registration application was a project submission application, so they provided more detail about their planned projects than is necessary for registration. They reported that this was likely just an oversight on their part, rather than an issue that the ILSFA Program needs to address.
- *Level of Detail*
 - Too much detail was required on the community engagement questions.
 - It was challenging to provide detailed information about their planned participation in each sub-program. This vendor ultimately decided not to apply for participation in the Community Solar (CS) sub-program because they were unable to provide the required level of detail about their planned CS projects at the time of registration.
 - The registration process was time-intensive because of the detailed, narrative responses required. Examples of particularly onerous questions included the specific locations of their planned projects (which change as projects develop) and detailed job training plans.³⁰
 - Some of the required documentation seemed unnecessary, though the interviewee could not recall specific examples.
- *Community Engagement*
 - Vendors are expected to have completed some community outreach before registration submission.³¹ However, the vendor felt that if they conduct community outreach too far in advance, then interested community members may forget about the project by the time it is installed. Further, they lose credibility as a company and as a developer if their project does not get selected and they are unable to deliver promised services to customers.
 - Community engagement should be the responsibility of Grassroots Educators, not AVs.
 - The community engagement questions were repetitive.
- *Inexperience with Solar*
 - Two vendors reported that their inexperience in the solar industry made the registration process challenging. One of them specifically noted that they found it difficult to understand the solar terminology used in the registration application.
- *Elevate Energy Contact*
 - They had trouble determining the correct point of contact at Elevate, though the issue has since been resolved.
 - They did not know whom to contact if they had questions about registration.

³⁰ Elevate reported that no specific project location is required at the time of registration.

³¹ This is required by the Long-Term Plan.

**Table IV-4
Confusing or Challenging Aspects of Vendor Registration**

Area of Difficulty	Number of Approved Vendors
Unclear Requirements	4
Level of Detail Required	4
Community Engagement	3
Inexperience with Solar	2
Elevate Energy Contact	2

Note: Vendors could identify more than one area.

Ten vendors reported that they were asked to resubmit/provide additional detail about some aspects of their registration application. Seven of these vendors were able to recall the specific areas for which they provided additional information, and this information is summarized in Table IV-5.

**Table IV-5
Resubmission of Information during Vendor Registration**

Information Resubmitted During Registration	Number of Approved Vendors
Community Engagement/Partnerships	4
Workforce Development or Job Training Plans	2
Illinois Work Scope	1
Sub-Program Plans	1
Subcontractor Non-Profit Status	1
Did not Remember Area	3
None	12

Note: Vendors could identify more than one area.

Vendors were asked how easy or difficult it was to use the portal for registration, and 17 of the 22 vendors reported that the portal was easy or somewhat easy to use.

**Table IV-6
Approved Vendor Registration Difficulty**

Registration Difficulty	Number of Approved Vendors
Somewhat Difficult	1
Somewhat Easy	2
Easy	15
Don't Know	4
Total	22

Vendors varied widely in the number of hours it took them to complete the registration process, from two to three hours to over 80 hours. One vendor that spent roughly 40 hours on registration stated that it was a major investment of their time, but they are hoping it will pay off when some of their projects are selected. Table IV-7 shows that eight of the 22 AVs reported it took them more than 20 hours to complete the registration.

Table IV-7
Hours to Complete AV Registration

Hours to Complete AV Registration	Number of Approved Vendors
<5 Hours	3
5-10 Hours	6
11-20 Hours	4
21-50 Hours	7
>80 Hours	1
Don't Know	1
Total	22

AV Registration Assistance

Vendors were asked whether Elevate proactively reached out to them to see if they needed assistance with the registration process and if they reached out to Elevate. Table IV-8 shows that 14 AVs reported that Elevate reached out to them and nine vendors reported that they reached out to Elevate.

Table IV-8
Communication with Elevate Energy about AV Registration

Communication	Elevate Reached Out to AV	AV Reached Out to Elevate
Yes	14	9
No	5	9
Not Sure	3	4
Total	22	22

The nine vendors that reached out to Elevate for registration assistance were asked which aspects of the registration process they requested assistance for. Two of the nine vendors did not remember what they asked Elevate. The remaining seven vendors contacted Elevate for the following reasons.

- Express frustrations with the community outreach/community engagement questions.
- Request referral to community organizations that the vendor could connect with.
- Obtain the ABP identification number needed for the application.
- Clarify Elevate's requests for additional information.

- Clarify the AV certification requirements. This vendor believed they only needed to be approved through the ABP before registering for the ILSFA Program, but Elevate informed them that they also needed Illinois Commerce Commission (ICC) approval.³²
- Determine level of detail required in their responses.
- Request assistance uploading files to the portal.

All nine vendors that asked Elevate for assistance with registration reported that Elevate was responsive and helpful. One vendor noted that Elevate was more responsive by phone than by email.

AV Registration Comments and Recommendations

Vendors' recommendations to improve the AV registration process are described below and summarized in Table IV-9.

- *Clarify the application instructions.*
 - Provide a video on the ILSFA website that walks vendors through the registration process.
 - Clearly state on the application what details Elevate is looking for in the vendor responses. This would reduce time spent providing additional information after the initial submission.
 - Use clearer and more concise language.
 - Clearly emphasize that vendors must first register through the ABP before registering for the ILSFA Program.
- *Reduce the length of the application.*
 - Only require information needed to approve registration applications.
 - Remove redundant questions in the application. The question about the project sites and the question about the communities where projects will be located are examples of redundant questions.
 - Require fewer narrative responses. For example, questions about whether vendors will comply with program requirements could be answered by clicking a checkbox instead of providing a narrative response.
- *Collect some information during project application instead of during registration.*
 - Two vendors reported that they were unable to submit CS projects, because they did not apply to pursue these projects on their registration application. One of these vendors felt that they should not have to choose the sub-program(s) they wish to pursue during registration.³³
 - The registration application could ask about intended community outreach plans, but vendors should not be required to engage with communities until they have a selected project.

³² This is only required for DG installer certification.

³³ The AVs are not required to submit this information during AV registration as they are asked the information again during project application. AVs can submit CS projects even if they do not complete this section of the AV registration.

- *Provide more feedback/updates about the registration process.*
 - Provide vendors with more frequent updates about the status of their registration application. This vendor reported following up with Elevate several times to inquire about their registration status.³⁴
 - Provide information about the experience level of Approved Vendors in the ILSFA. Specifically, provide information on how many developers with no prior solar experience are actively submitting projects and having projects selected.
 - Provide detailed feedback to vendors about their registration application, regardless of approval status. Receiving detailed feedback would help vendors understand why they were approved, and if they need to change their plans in any way.
- *Two vendors provided recommendations for the portal with respect to registration.*
 - Allow vendors to edit their responses in the portal. This vendor noted that they were unable to edit their responses once they were entered, even though they had not yet submitted their application.
 - Rather than handling requests for additional information/resubmissions via email, Elevate should request additional information and vendors should provide the requested information within the portal.
- *Other recommendations.*
 - Create an email address for vendors to contact with questions about registration.
 - Streamline the registration process so that vendors only need to apply once for approval through both the ABP and the ILSFA Program.
 - Require vendors to sign the attestation that they will follow all laws, rules, and guidelines only once, at the time of registration.

Table IV-9
AV Registration Recommendations

AV Registration Recommendation	Number of Approved Vendors
Clarify Application Instructions	4
Reduce AV Registration Application Length	3
Collect Information During Project Application	3
Provide More Frequent Updates on Registration Process	3
Portal Recommendations	2
Other	3

Note: Vendors could identify more than one recommendation.

³⁴ Elevate reported that their current practice is to inform AVs that their application has been received, their place in the review queue, and the expected date for completion of the initial review. If the review goes beyond that period, Elevate will inform the AV. Nearly all communications are via email, but Elevate often answer questions about the application process in phone conversations. AVs are always invited to contact Elevate with questions.

Vendors also provided the following comments about the registration process.

- Three vendors noted that, overall, the ILSFA registration process was well-organized.
- One vendor noted that while the registration process is more detailed and time-consuming than registration for similar programs, the level of detail is necessary because it helps to weed out vendors who are not serious about the program.
- One vendor reported that they never received official confirmation from the ILSFA Program that they were an Approved Vendor.
- One vendor noted that they do not believe any changes need to be made to the registration process.
- One vendor reported that they ultimately decided to participate in the ILSFA Program because it aligned with the company's belief that the full societal and economic benefits of solar have not yet reached the low-income community.

Project Submission and Selection

Approved Vendors were also asked questions to assess their project submission experience overall, their experience with the vendor portal, the assistance they received during project submission, the project selection process, and income verification. This section summarizes those findings.

Project Submission Experience

The four vendors that had not submitted any projects at the time of the interview provided the following information about why they had not done so.

- The first submission window was too short to develop and submit a project.³⁵ Though there is more time in the second submission window, they are still developing a better understanding of the program requirements and finding customers who are interested in participating.
- They designed a CS project but were notified that it was too big and would not qualify for the program. They are considering submitting this project through the competitive bid process for CS Pilots instead.
- They did not receive their AV status until recently, and they are presently working on finding interested consumers.
- They have not yet submitted any projects due to an "internal operational barrier," unrelated to the ILSFA Program.

Seven vendors reported that they started project submittals that are not yet complete. Table IV-10 displays the reasons why these projects have not been submitted.

³⁵ The IPA noted that while the submission window was short, there was significant advance notice.

**Table IV-10
Reasons Project Submittals Were Incomplete**

Reasons Why Projects were Not Submitted	Number of Approved Vendors
Working on Interconnection Agreement	3
Roofs Were Not Good Candidates (NP/PF Projects)	1
Projects Under Development	1
Working on Project Resubmission	1
Will Submit Under CS Pilot Sub-Program	1
Obtaining Standard Disclosure and Site Usability	1

Note: Vendors could identify more than one reason.

Vendors were asked how challenging they found the project submission process, and 14 of the 22 vendors reported that the process was at least somewhat challenging. Notably, seven of the eight vendors that reported the process was not challenging were vendors with selected projects.

**Table IV-11
Project Submission Difficulty**

Project Submission Difficulty	Number of Approved Vendors
Very Challenging	4
Challenging	7
Somewhat Challenging	3
Not at all Challenging	8
Total	22

Some vendors provided the following additional details when asked this question.

- One vendor reported that the process was so “unbelievably challenging” that it has cast doubt on whether they will ever submit projects to the ILSFA Program again. The only reason they may consider participating in the future is because they have already invested money into the program and because they believe in the program’s mission.
- The project submission process is much more challenging than many other programs this vendor has worked with.
- One vendor that found the process challenging noted that this may be due to their lack of familiarity with the ILSFA Program and the solar industry.

When asked what aspects of project submission they found to be challenging, vendors shared many complaints and reported facing many challenges in various aspects of the project submission process. These areas are summarized in Table IV-12.

Vendors reported that the following areas of the application are unclear and/or challenging.

- The most recent version of the portal asks for a new line item called a “Structural Report,” but neither the portal nor the AV manual explain what such a report should include. It is unclear if the Site Suitability Report requested in the manual is the same as the “Structural Report”.³⁶
- There are some parts of the application in which it is unclear whether the question is asking about technical specifications or project financing.
- Whenever the submission application requests an address, it is unclear whether it is requesting the owner address or the project site address (which could be different).
- The “subjective” questions that require narrative responses are challenging to answer because they require details that are not explicitly stated.
- There is no resource that clearly states all the submission requirements in one place. The requirements are spread throughout the AV manual.
- The requirements for ILSFA project submissions are much more detailed and specific than the ABP. As a result, the main challenge is understanding what exactly the ILSFA Program is looking for in the submissions.

Vendors faced the following challenges obtaining the interconnection agreement.³⁷

- For ILSFA projects, vendors must either pay the full upgrade costs before they know if their project will be funded or let their interconnection agreement lapse.³⁸
- It takes about 60 days to obtain an interconnection agreement, so vendors must initiate the interconnection process at least a couple months ahead of the submission deadline if they have a project over 25 kW. Because the vendor was unaware of how long this would take, they were unable to submit projects within the first submission window.
- Because they were unable to obtain and submit their signed interconnection agreements within the Cure Period or the extension window after the Cure Period, they must now resubmit all the information for their projects, instead of simply amending their previous submissions.
- When one of their projects fell through, they could have increased the project size of one of the other projects in their batch to meet the minimum batch size³⁹, but they chose not to do so because the increased project size would mean that they would need to obtain an interconnection agreement, which they did not want to do before project selection.
- Utilities take longer than promised to provide a signed interconnection agreement. Further, they do not provide the full costs for interconnection upfront, so vendors are required to invest money in a project without knowing what the full project costs will be. Vendors can lose a significant financial investment if they are unable to obtain an interconnection agreement, and for-profit companies are better equipped to handle that potential loss than non-profits. The potential losses that vendors could incur are a barrier to program participation for many non-profit and MWBE vendors.

³⁶ Elevate clarified that these are two different reports.

³⁷ The interconnection agreement is between the system host and the utility, and is external to the ILSFA Program.

³⁸ Vendors only are required to make a deposit, and that deposit is refundable (net any costs incurred by the utility).

³⁹ This is addressed in the Revised Long-Term Plan.

Vendors reported the following about the volume of information required for project submission.

- Two vendors reported that the amount of detailed information required for project submission is time-consuming to provide.
- The level of detail required for project submission can be cumbersome. However, the detailed requirements make sense because they filter out AVs that are not serious about their project, and consequently protect consumers from signing up for projects that may fall through.

Vendors reported that the following project eligibility requirements were unclear or unfair.

- The requirement that Critical Service Providers (CSPs) must be located within the city they are serving is not stated in any of the program documents.⁴⁰
- The information about project eligibility is unclear overall.
- The program guidelines seem to be tailored towards projects in Chicago and the Chicago suburbs, so it is difficult for vendors and projects in rural areas to participate. For example, one of the program requirements is to obtain a signature on the project's electric permit from an official located in the City of Chicago, which is difficult for vendors located elsewhere in the state to obtain.⁴¹
- The NP/PF cost savings requirement was increased from 50 percent to 65 percent⁴² if the project takes the investment tax credit (ITC), which the vendor feels benefits projects that have angel donors willing to finance projects for little or no return, while squeezing out projects that require outside investors (typically the neediest NP/PF projects) from the market.

Vendors faced the following challenges with Elevate Energy.

- The day that submissions were due, Elevate sent several emails about items in their application that were incomplete or needed to be updated. The vendor felt that Elevate was hoping for immediate responses, which was unreasonable given the timeline.
- There were times when they had to correct Elevate staff about program guidelines. For example, the AV manual states that vendors working on NP/PF projects for CSPs in EJ communities do not need to provide information on community outreach/community engagement, but Elevate was initially unaware that this was not required.

Vendors reported the following about finding eligible customers.

- Finding customers that meet the very specific eligibility requirements is “immensely difficult.”⁴³
- Finding eligible customers has been a barrier to submission.

Vendors faced the following challenges with the program timeline.

⁴⁰ Elevate reported that the NP/PF is not eligible if they serve an EJ or low-income community but are located outside of that community.

⁴¹ This is not correct.

⁴² This is included in the Revised Long-Term Plan. The change has not yet gone into effect.

⁴³ FEJA requires customers to be income-eligible. The ABP is available for non-income-eligible customers.

- The fact that the second project year deadline was only two months after the first project year deadline was challenging. It was unclear when the new program year started, and the vendor would have missed the deadline if Elevate had not notified them.⁴⁴
- The short submission window in the first round was a barrier to project submission.

Vendors faced the following challenges with project financing.

- They had a hard time understanding how project financing would work in the ILSFA Program. They had many conversations with Elevate to understand project financing, and though Elevate was very responsive, “there were limits to how much [Elevate] felt comfortable helping them” figure out how to finance their projects.
- Buildings in the communities that the ILSFA Program aims to reach often require mitigation (e.g. rooftop repairs, electrical infrastructure repairs) to participate in the program. However, the program incentives are not sufficient for vendors to cover the costs associated with these repairs.

Vendors faced the following additional challenges in project submission.

- The ILSFA Low-Income Distributed Generation Disclosure Form for Power Purchase Agreements (PPAs) used the word “Lease” instead of “PPA” in many places.
- Some of the tasks that must be completed for project submission are “onerous and irrelevant”. For example, vendors must submit information about community engagement during project submission despite having already submitted this information during the registration process.⁴⁵
- The ILSFA project requirements are more numerous and more rigorous than for many other programs. However, they understand why the requirements are so rigorous, as the program aims to assist and protect low-income consumers, while providing “very lucrative” incentives to vendors.

Table IV-12
Confusing or Challenging Aspects of Project Submission

Challenge	Number of Approved Vendors
Unclear Application	6
Interconnection Agreement	5
Project Eligibility Requirements	3
Volume of Required Information	3
Elevate Energy	2
Finding Eligible Customers	2
ILSFA Timeline	2
Project Financing	2
Other	3

⁴⁴ Announcements were sent out about the program deadlines.

⁴⁵ This is required by the plan to demonstrate the applicant’s capacity to participate.

Note: Vendors could identify more than one area.

Vendor Portal for Project Submission

Fourteen of the 22 vendors reported that the portal was easy or somewhat easy to use for project submission.

Table IV-13
Difficulty Using Portal for Project Submission

Project Submission Difficulty	Number of Approved Vendors
Very Difficult	1
Difficult	2
Somewhat Difficult	4
Somewhat Easy	2
Easy*	12
Have Not Yet Used	1
Total	22

*Two said the portal was initially difficult to use but is now easy to use.

With respect to the project submission process, AVs reported that they faced challenges uploading information, accessing applications, and understanding instructions in the portal. Specific detail AVs provided about these areas of difficulty were as follows and are summarized in Table IV-14.

- *Uploading Information to the Portal*
 - Four vendors reported that there were times when documents were unsuccessfully uploaded to the portal.⁴⁶
 - Two vendors reported that there are not spaces in the portal to upload certain required documents, like the equipment specifications.⁴⁷
 - Two vendors reported that once vendors submit their application, they cannot make changes or add new documents, so if Elevate asks a vendor for additional or revised information, vendors must email that information.⁴⁸
 - Two vendors reported that there is no confirmation if documents are successfully received in the portal.
 - One vendor reported that the portal does not pre-populate information from uploaded CSV files, so vendors must re-enter information after uploading their spreadsheets.⁴⁹
 - One vendor reported that the current portal requires vendors to manually enter information that was accepted in a spreadsheet in the previous portal. Items that

⁴⁶ Elevate reported that they were aware of one case where the AV was not able to upload a file because the file size was too large. The AVs have also had questions about where to upload some documents.

⁴⁷ Elevate reported that this was corrected prior to the start of the program year two application window.

⁴⁸ Elevate reported that this was corrected prior to the start of the program year two application window.

⁴⁹ Elevate reported that this was corrected prior to the start of the program year two application window.

- vendors must now submit manually include information about the arrays, whether the projects require mitigation, and the capacity factor.⁵⁰
- One vendor reported that the portal asks vendors to submit some information in the wrong places.
 - One vendor reported that there is a maximum file size for photos uploaded to the portal, but this restriction was not listed on the portal.
- *Understanding Portal Instructions*
 - One vendor reported that the information about energy supply and energy cost was difficult to understand.
 - One vendor reported that instructions about the required addenda were difficult to understand.
 - One vendor reported that the portal requested vendors to provide a disclosure agreement for NP/PF projects, but there were no instructions about what the agreement should include.⁵¹
 - One vendor reported that they were unsure what to provide with regards to subscriber information, partnering community organizations, and the technical specifications spreadsheet.
 - *Accessing Applications on the Portal*
 - One vendor reported that they were unable to log into the portal to complete any project submissions. It was later determined that they were unable to log in because they had not yet been officially approved as a vendor in the program.
 - One vendor reported that they could re-open saved applications in the portal; however, when selecting an application to re-open, the portal does not list a name for the application, only the timestamp of when it was last saved, which makes it difficult for vendors to find the right application.
 - One vendor reported that they were unsure how to save their application in the portal, so if they did not complete their submission in one sitting, they had to reenter information in the next sitting.
 - *Other Areas of Difficulty in the Portal*
 - One vendor reported that there were times when they were unable to send customers the disclosure form through the online portal.
 - One vendor reported that there were a few glitches in the portal. For example, during the second project round, the portal did not give them the option to state that their project was a ground installation – they were forced to select the “roof installation” option.

⁵⁰ Elevate reported that this was corrected prior to the start of the program year two application window.

⁵¹ There is a standard form with documentation on what is required.

**Table IV-14
Portal Challenges Faced During Project Submission**

Challenge Area	Number of Reported Challenges in Area
Uploading Information to Portal	8
Project Application Instructions	4
Accessing Project Application	3
Disclosure Forms	1
Portal Glitches	1

Project Submission Assistance

Vendors were asked whether Elevate proactively reached out to them to see if they needed assistance with the project submission process and whether they reached out to Elevate. Table IV-15 shows that 19 AVs reported that Elevate did reach out to them and 20 vendors reached out to Elevate.

**Table IV-15
Communication with Elevate Energy about Project Submission**

Communication	Elevate Reached Out to AV	AV Reached Out to Elevate
Yes	19	20
No	3	2
Total	22	22

The 20 AVs that requested assistance were asked which aspects of the project submission process they requested assistance with. Nineteen AVs were able to recall and reported asking Elevate for the following, summarized in Table IV-16.

- Five vendors asked for assistance with some of the project submission requirements. Specific requests for assistance were as follows.
 - Three vendors asked for confirmation that the information they were providing met the submission requirements/the level of detail Elevate was expecting.
 - Assistance when they were unable to obtain a required signature from the head of their public facility.
 - Clarification about the price of RECs and the calculation of the kWh rate.
 - Whether questions were referring to technical specifications of the project or project financing.
 - Clarification on the savings calculation process.
 - Clarification on how to calculate the capacity factor.

- Five vendors asked for assistance with some of the required documentation. Specific requests were as follows.
 - An example Structural Report.

- Clarification on how the savings calculation spreadsheet accounts for a vendor offering an immediate system purchase.
- Additional details about the spreadsheets that were required for project submission; including clarifying some of the terminology, and how to calculate the anticipated energy generation and cost of generation of the solar system.
- More detailed instructions about the contract between the property owner and the AV, as the instructions on the portal were difficult to understand.
- Information on how to document the historical energy costs for NP/PF buildings.
- Six vendors asked for assistance with the portal. Specific requests were as follows.
 - Assistance logging into the portal.
 - Information on what to upload in the portal when a requested document was not applicable.
 - Assistance when documents were not successfully uploaded to the portal.
 - Glitches in the submission portal.
 - Errors in the SDA forms.
 - Errors in the Excel sheet used for project modeling.
- Other requests for assistance related to ILSFA guidelines.
 - Clarification on how projects were scored and ranked in the selection process.
 - Clarification about project eligibility requirements, because the program rules were constantly changing. For example, CSPs that rented their facility were previously eligible for the program, but the guidelines were changed so that CSPs only qualify if they own their building.
 - Clarification about the income verification process.
 - Assistance with the interconnection agreement process.
 - Clarification about the way REC quantities and values were calculated.

Table IV-16
Areas for Assistance During Project Submission

Areas for Requested Assistance	Number of Approved Vendors
Portal	6
Project Submission Requirements	5
Required Documentation	5
ILSFA Guidelines	4
Did Not Remember	1

Note: Vendors could identify more than one area.

The 20 vendors that requested assistance were asked how helpful Elevate was in answering their questions, and 18 of the 20 reported that Elevate was at least somewhat helpful.

**Table IV-17
Elevate Energy Helpfulness with Project Submission Questions**

Elevate Energy Helpfulness	Number of Approved Vendors
Very Helpful	9
Helpful or Somewhat Helpful	9
Not Helpful	2
Did not Request Assistance	2
Total	22

A few vendors provided the following additional detail when asked this question.

- Two vendors noted that it was more difficult to reach Elevate staff via phone than email. One vendor reported that this was frustrating because there were times when it would have been more efficient to discuss a question over the phone rather than over email.
- Elevate was helpful, but the vendor still found the program guidelines difficult to understand, even after receiving assistance.
- One vendor reported that they “can’t say enough good things about Elevate Energy” and that Elevate did a superb job of helping with the project submission process.
- Elevate was generally helpful, but it was difficult for Elevate to answer questions about the income verification process because that process is handled by a third party.
- None of Elevate Energy’s Vendor Managers have experience building solar projects, so they sometimes request project changes that the vendor feels are impractical.
- Elevate was responsive but not helpful. When the vendor was facing issues obtaining the interconnection agreement, Elevate told them to submit their projects in the next program round, but this disadvantaged their projects because projects submitted in round one were prioritized on the waitlist.⁵²

Project Selection

Vendors were asked how they felt about the project selection process. Five of the 22 vendors expressed dissatisfaction with parts or all of the project selection process.

- Two vendors reported that the project selection process is unclear.
- One vendor reported that the current competitive procurement process for CS Pilots is antithetical to the ILSFA Program goals for these projects – instead of rewarding innovation, the ILSFA is only looking at who can provide the lowest bid.
- One vendor felt that Elevate disqualifying their projects because they were received just a few minutes past the deadline was “absurd.”
- One vendor felt that the project selection process was one of the worst elements of the ILSFA Program. They noted the prioritization of projects submitted in year one over projects submitted in year two as one of the poorly designed aspects of the process.⁵³

⁵² The Revised Long-Term Plan removes this prioritization for subsequent program years.

⁵³ The Revised Long-Term Plan removes this prioritization for subsequent program years.

Three vendors reported the following challenges/areas of confusion with the project selection process.

- One vendor reported that the project selection process is incredibly complex because project scores are “weighted” based on the number of submitted projects in each utility service territory, which makes it difficult for vendors to predict whether their project will be selected.
- One vendor was confused about how the scoring system accounts for whether a project is in an EJ community.⁵⁴
- One vendor reported that it is difficult to determine project sizing for the ILSFA Program. Because each sub-program has a limited REC budget, whether a project will get selected is partially determined by the size of the projects submitted by other vendors in that sub-program.⁵⁵

However, five of the 22 vendors reported satisfaction with project selection.

- Three vendors reported that they were satisfied with the project selection process.
- One vendor reported that the project selection process is straightforward.
- One vendor expressed gratitude for being selected, stating that the savings from the ILSFA Program will result in increased funding for students in the school district.

Table IV-18
Satisfaction with Project Selection Process

Satisfaction	Number of Approved Vendors
Expressed Dissatisfaction	5
Expressed Satisfaction	5
Did Not Express	12
Total	22

Other comments vendors made about the project selection process were as follows.

- One vendor noted that there are not many projects approved for Cook County, even though roughly 40 percent of the state’s population lives in and around Chicago.
- One vendor noted that some counties in Illinois have not had any projects selected, which indicates that the project selection process should be reevaluated to ensure that all areas of Illinois have equal access to the program.⁵⁶
- One vendor stated that the fact that very few DG projects were submitted and that none were selected is evidence that the requirements for DG – specifically the income requirements – are too stringent.

⁵⁴ The project selection protocol does account for projects located in EJ communities.

⁵⁵ The program was designed in this manner to reach program goals. Selection protocols will be revamped for the next program year.

⁵⁶ Given the number of projects selected in the ILSFA Program, it is not possible for all counties to contain projects.

Income Verification

Two of the 12 vendors that submitted CS and/or DG projects reported that they had performed the income verification process (one for a DG project, and one for a CS project). Three of the 12 vendors that had not yet performed the process reported that they were not planning to do so until they had a selected project.

One of the vendors that had performed the income verification process reported that they faced challenges. They stated that the income verification process is burdensome and that it is nearly impossible to find people who meet the eligibility requirements.

Both vendors that performed the income verification process reported that customers have been reluctant to divulge the requested information. One vendor elaborated that customers are skeptical of whether the program is legitimate. To overcome this skepticism, the vendor provides customers with the informational materials from the ILSFA website. Once customers have reviewed the ILSFA information, they are generally willing to provide the requested income information.

Vendors provided the following additional comments about the income verification process.

- The income verification process seems reasonable.
- It is inappropriate for the ILSFA Program to require vendors to directly handle customer financial information and perform income verification.
- The issue in getting customers to provide required documentation is not that they are reluctant to provide it, but that they do not respond to contact attempts.
- The process will be challenging because the program does not provide significant savings for consumers in the short-term, so low-income consumers may not feel motivated to complete the process.

Project Eligibility, Submission, and Selection Recommendations

Vendors provided recommendations about project eligibility and submission that are summarized in Table IV-19.

- *Project Submission Instructions*
 - Two vendors stated that the project submission instructions should be simpler and clearer.
 - Two vendors recommended releasing the updated version of the AV manual several months to a year in advance of the project submission deadline to give vendors adequate time to prepare their applications according to the guidelines in the manual.
 - Review the project submission application to make sure that the same questions are not being asked multiple times.
 - Provide examples of submission-worthy documents. This could include examples of the shading analysis document and examples of the document with historical energy costs for NP/PF buildings.
 - Have one clear place where all the project submission guidelines can easily be found.

- Group all technical specification questions in one section and all financing questions in a separate section to avoid confusion about whether the question is asking about project financing or technical specification.
- Clearly specify whether the application is requesting the owner address or the project site address.
- *Interconnection Agreement Process*
 - Three vendors recommended that the ILSFA Program allow vendors to wait to complete their interconnection agreements and pay the full upgrade costs for projects over 25 kW until after the project is selected.⁵⁷
 - The ILSFA Program and Illinois' major utility companies should create a team dedicated to handling the interconnection process for ILSFA projects, so that the interconnection process for those projects can be expedited.⁵⁸
 - Utilities should prioritize Solar for All projects, potentially by creating a separate interconnection queue.
 - Utilities should provide vendors with the full interconnection costs upfront.
- *Project Submission Timeline*
 - Do not require community engagement until after the projects have been selected.
 - Implement a “pre-qualification” process, in which vendors first provide information on the size and scope of a project. If the project meets the basic project design requirements (in terms of sizing and energy generation), then vendors can move forward with the full project submission application.
 - Allow vendors to upload submission applications at any time (even before the submission window is opened).⁵⁹
 - Do not require expensive and burdensome requirements, such as site inspections and income verification, until after projects are selected.⁶⁰
 - Provide a two-week extension window after the Cure Period.
- *Income Verification*
 - Two vendors suggested that the ILSFA Program have customers send their income verification documents directly to the IPA or Elevate Energy.⁶¹ One vendor felt that this would help alleviate some of the skepticism about the program. The other vendor stated that because the ILSFA aims to protect low-income homeowners, their financial information should not be available to the vendors.
 - One vendor recommended that the ILSFA Program change the income eligibility requirements for DG projects to match the requirements for CS projects (i.e. if a customer lives in a low-income census tract, that customer should be eligible for the

⁵⁷ This is not under the control of the ILSFA Program. Only a deposit is required.

⁵⁸ The interconnection rules may not allow for this.

⁵⁹ Elevate reported that this was addressed at the start of the program year two applications.

⁶⁰ This could result in selection of ineligible projects.

⁶¹ The Revised Long-Term Plan includes the development of an option for the Program Administrator to perform the income verification.

program without having to verify their income). This would simplify the income verification process.⁶²

- *EJ Community Self-Designation*
 - Provide more feedback about EJ community self-designation decisions.
 - Take a more qualitative approach when evaluating EJ community self-designation forms. This vendor was disappointed that Elevate rejected an application submitted by a community that came together to provide extensive quantitative and qualitative support of the history of systemic poverty in their area. Their application also provided quantitative and qualitative information on the community's environmental issues, including severe weather history and water quality.
 - Make it easier for towns to self-designate as EJ communities. This will make participation more feasible for vendors in rural Illinois.

- *Standard Disclosure Agreements (SDAs)*
 - Eliminate the seven-day waiting period between signing the SDA and the PPA/lease agreement. The ABP does not have this waiting period, and customers may feel that the waiting period is preventing their project from moving forward “in a timely manner.”⁶³
 - Reduce the level of detail in the SDA so that it does not have to be re-signed each time there is a minor change. The SDA should only state that the vendor reviewed the program with the customer, that the customer will have no upfront costs, and that the customer will achieve an {X} percent savings.

- *DG Sub-Program Guidelines*
 - Allow virtual net-metering for the DG sub-program, instead of requiring roof installations, to make DG sub-program participation more feasible.⁶⁴
 - Allow vendors to submit single projects without having to meet the minimum batch requirement.⁶⁵ The minimum batch size requirement is a barrier to participation in the DG sub-program because most residential systems are roughly 2 kW; so vendors would need to identify, design, and submit about 25 DG projects to meet the batch requirement, which is unrealistic.

- *Other Recommendations*
 - Require 50 percent of all project crew to be job trainees. This would allow for a one to one ratio between skilled tradespeople and newly trained workers.

⁶² The IPA did not (and does not) support this idea, as it developed the Revised Long-Term Plan. With the Revised Long-Term Plan now approved by the ICC, any changes to the income eligibility verification would require a subsequent modification to the Long-Term Plan.

⁶³ This is based on best practices in other jurisdictions. This change would require a revision to the Long-Term plan.

⁶⁴ This is permitted for multi-family DG.

⁶⁵ This is included in the Revised Long-Term Plan for AVs who have previously had a batch of projects approved by the ICC.

- Accept application signatures from other NP/PF officials, particularly for large organizations.
- Allow vendors to report on solar panel specifications by project rather than by array.⁶⁶
- Encourage collaboration between vendors. This would generate increased program participation from local developers with less solar experience by giving them opportunities to connect with more experienced vendors. Elevate could encourage this collaboration by creating an online forum in which vendors could post questions or requests for subcontractors or trainees.
- Have more flexibility when a project is located just outside of/across the street from a low-income census tract.
- Assess what information is necessary to make project selection decisions, and only require that information on the submission application.
- Allow vendors to amend previous submissions instead of resubmitting entire submissions if they miss the Cure Period.
- Increase incentives and connect vendors with other funding sources to fund any necessary mitigation.
- Create a forum/space for a dialogue about Elevate Energy’s project application decisions, so that vendors can communicate when/why they disagree with Elevate Energy’s findings.

**Table IV-19
Project Eligibility and Submission Recommendations**

Recommendation Area	Number of Recommendations in Area
Clearer Instructions	7
Project Submission Timeline	5
Interconnection Agreements	4
EJ Community Self-Designation	3
Income Verification	2
DG Sub-Program Guidelines	2
Standard Disclosure Agreements	2
Other	9

Vendors provided the following recommendations for additional information they would like to receive from the ILSFA Program.

- Communicate to vendors that “project readiness” is a huge advantage in the program. This vendor elaborated that projects that are already far along in the development cycle when the submission window opens are at an advantage because they have more time to obtain required documentation, including interconnection agreements.

⁶⁶ Elevate reported that individual arrays must be entered separately to allow for the production calculation. The ABP also requires information to be submitted on each array.

- Provide the name and contact information for vendors with selected projects.⁶⁷
- Provide the project size, location, and vendor for selected projects.⁶⁸
- Provide more information about the feasibility of large projects in the program (e.g. are large projects less likely to be selected?).⁶⁹

AV portal project submission recommendations related to information/document uploading, additional capabilities, and clearer instructions. Specific recommendations in each of these areas were as follows and are summarized in Table IV-20.

- *Uploading Documents and Entering Information*
 - Three vendors recommended that Elevate allow vendors to include all information in one workbook, instead of various uploads.
 - Use the submission portal as a central repository for submitted documents. Vendors should be able to upload additional and/or revised documents to the portal, even after the project has been submitted (rather than needed to email these documents).
 - Allow vendors to upload information in spreadsheets, instead of manually entering information.
 - Allow vendors to edit response fields once they have entered information.⁷⁰
- *Additional Portal Capabilities*
 - The portal currently calculates the max REC value for a project. For CS projects, the REC value calculation should show the value based on the type of subscribers and anchors that were indicated.⁷¹
 - Provide a confirmation message when batches have been successfully submitted.
 - Provide a confirmation message once documents have been successfully uploaded.
 - Include a field for vendors to upload an “additional information” document that could include any additional clarification that vendors want to provide.
 - Include a “notes” section for the questions which have drop-down answers to select.
 - Include a “Not Applicable” checkbox that vendors can select if a requested document is not applicable to their project.
 - Add a capacity factor calculator to the application. Vendors could input project attributes, including system size and degradation rate, and the calculator would provide a capacity factor, so that vendors would not have to calculate the factor themselves.
- *Clearer Instructions*
 - Clearly list information about the maximum file size for photos.
 - Provide an information icon next to each question to see more a more detailed explanation of that question.

⁶⁷ This information is available on the ILSFA website.

⁶⁸ This information is available on the ILSFA website.

⁶⁹ The project selection protocol provided the criteria for weighted selection and will be updated for the next program year.

⁷⁰ Elevate reported that this was addressed prior to the start of the program year two application window.

⁷¹ Elevate reported that this was addressed prior to the start of the program year two application window.

- Provide more detailed descriptions of what Elevate is looking for in the vendor’s responses.
 - Ensure that the instructions in the portal match the information in the Approved Vendor manual (e.g. the portal should have a place to upload the equipment specifications document that is discussed in the manual).
 - Include a “test” project submission page, in which vendors can click through each page of the portal without having to input any information, to determine what information is required for project submission.
- *Other Recommendations*
 - Look into hiring the company that designs and operates the vendor portal for Illinois Shines because that portal works much better.
 - On the portal screen, there are several scroll bars – one for the entire web page, and then a bar for the response box for each question. Only use one, long scroll bar for the entire webpage.
 - Accept DocuSign as an authorized signature capture process.
 - Provide a project name, not just a timestamp, for all applications that are in progress to make it easier for vendors to return to and navigate between multiple applications.
 - Pre-fill or do not ask about the standard degradation rate, because the manual states that a standard degradation rate of 0.5% is used for all calculations.

Table IV-20
Project Submission Portal Recommendations

Project Submission Portal Recommendation Area	Number of Recommendations in Area
Additional Portal Capabilities	7
Clearer Instructions	5
Uploading Documents and Entering Information	4
Other	5

When asked to provide recommendations for the project selection process, vendors made suggestions about project selection criteria, MWBE scoring, and the transparency of project selection, in addition to other recommendations. These recommendations are summarized in Table IV-21.

- *Project Selection Criteria*
 - Score CS projects without an anchor higher than projects with an anchor.⁷²
 - Increase the requirements for first year savings or give more points to projects that provide higher first-year savings.
 - Look at project selection more qualitatively by asking consumers to share on the project submission application why they feel they/their community are deserving of

⁷² This is addressed in the Revised Long-Term Plan.

- the program. This would be a useful way to identify which projects are most deserving of program participation.
- Account for the fact that projects in Chicago or located on brownfields may have higher costs due to location and existing conditions.
 - Give preference to vendors with projects that are further along in the interconnection process.
 - Provide point(s) for projects that are located on brownfield sites.
 - The score for each project should not be contingent on projects submitted by other vendors (e.g. the utility territory of other projects submitted in that sub-program in that submission window).
- *Transparency of Project Selection*
 - Three vendors requested that the ILSFA Program provide more feedback about why projects were/were not selected.⁷³
 - Provide additional information about the project selection process.⁷⁴
 - Provide additional clarity about why each project was awarded the points that it received. This information could be sent in an email to the developers.⁷⁵
 - Provide more specific guidelines for selecting between projects with the same score.
 - *MWBE Scoring*
 - Two vendors recommended that the ILSFA Program provide point(s) for vendors that are committed to working with MWBEs. One vendor specified that this could be treated in the same way small subscriber adders are treated (i.e. vendors could indicate the percentage of the project value they intend to give to MWBEs and be held to the that range). However, they noted that vendors should not be expected to have solidified relationships with MWBEs prior to submission.⁷⁶
 - Consider the demographic makeup of a company's salaried employees – not just the demographics of the owners – when awarding points for minority/female presence at the company.
 - *Other Project Selection Recommendations*
 - Provide more time for vendors to make corrections and provide additional documentation, if required.
 - Consider transferring funds from the DG sub-program budget to the NP/PF and/or CS sub-program budget, given that very few DG projects have been submitted/selected thus far.

⁷³ Scoring of projects was based on a protocol published prior to the scoring, and the scoring for each project was released prior to the final selection. Seed values for the random selection generator were provided on the website so that the results could be confirmed.

⁷⁴ Scores from the project selection were published.

⁷⁵ AVs were sent their scores. There is a scoring rubric that was announced prior to the submission window.

⁷⁶The Revised Long-Term Plan broadens the definition of a MWBE and provides for a substantial overhaul of the project selection protocol.

- Simplify the project selection design. The only information Elevate should provide is that there are three subcategories (EJ, low-income, and general selection), and projects scoring the most in each subcategory will be selected.
- Do not make changes to the selection guidelines because the program has already used the same guidelines for two submission windows.
- Ensure that program funding is evenly distributed throughout Illinois. This will show potential participants that the program has an equitable selection process.

Table IV-21
Project Selection Recommendations

Project Selection Recommendation Area	Number of Approved Vendors
Project Selection Criteria	7
Transparency of Project Selection	6
MWBE Scoring	3
Other	5

Note: Vendors could identify more than one recommendation area.

Future Projects

Vendors' responses to the types of future projects considered are summarized in Table IV-22. While 20 AVs were considering NP/PF projects, 12 were considering CS projects, and nine were considering DG projects. Seven additional vendors reported that they may consider submitting DG projects in the future.

Table IV-22
Future Projects Considered

Sub-Program Considered for Future	Number of Approved Vendors
Non-Profit / Public Facility	20
Low-Income Community Solar	12
Low-Income Distributed Generation	9

The two vendors that reported they were not considering NP/PF projects provided the following detail.

- They exclusively do solar projects for single-family homes.
- They do not plan to design any additional projects for the ILSFA Program due to their negative experiences in the program thus far.

The ten vendors that were not considering CS projects provided the following detail, summarized in Table IV-23.

- Two vendors reported that a subscription-based model would not align with their current business model.

- Two vendors are focusing on NP/PF projects and one vendor exclusively does solar projects for single-family homes.
- Two vendors reported that CS projects are not feasible in the rural areas where this vendor works or that there is too much competition and development costs are extremely high.
- One vendor reported that they would like to submit CS projects, but the ILSFA Program is not accepting additional CS project submissions.
- One vendor reported that the process to get the necessary documentation from potential subscribers is “extremely difficult” because they are not responsive to contact attempts.
- One vendor reported that they would like to, but they elected not to apply for CS certification in their vendor registration because they were unable to provide the requested information about their planned CS participation. (Note that this AV is eligible to apply for CS projects.)

Table IV-23
Reasons for Not Considering Community Solar Projects

Reason Community Solar Not Considered	Number of Approved Vendors
Not Aligned with AV’s Business Model	2
Focusing on NP/PF Projects	2
Not Feasible for AV	2
Focuses on Single-Family Homes	1
Too Difficult to Get Subscriber Documentation	1
Did not Apply in AV Registration	1

Nine AVs reported that they would consider submitting Distributed Generation (DG) projects to the ILSFA Program in the future. One of these vendors specified that their company’s mission is to deliver sustainable improvements to affordable housing.

Seven vendors reported that they might consider submitting DG projects in the future, but they were not certain. Some of these vendors provided the following additional detail.

- One vendor wanted an acknowledgement from the IPA and Elevate that the program has not been managed properly up to this point and that they are dedicated to making changes to the program structure. If the vendor receives that acknowledgement, they may submit DG projects.
- They have been looking into these projects, but they are used to working with large property owners, not homeowners. Finding low-income households that meet the structural requirements for the program would be too cumbersome for them at this time.
- If they could find a qualifying residence, they would pursue a DG project, but it is incredibly difficult to find a home with qualified low-income residents that would accommodate a solar installation on the roof.

- Under the current program design, the risk of installing rooftop solar on low-income households is greater than the benefit that vendors could receive from these projects, but they would be willing to pursue the DG sub-program if they find a feasible project.

Six vendors were not considering DG projects and provided the following reasons why.

- Three vendors reported that they are only focusing on NP/PF projects, not DG projects.
- One vendor does not plan to design any additional projects for the ILSFA Program due to their negative experiences in the program thus far.
- One vendor felt that the income verification process would be too challenging. Further, in order to meet the minimum batch size requirement, they will have to complete the income verification process for multiple projects.⁷⁷
- One vendor does not work with residential projects.

ILSFA Training and Resources

Vendors were asked questions to assess the Approved Vendor training sessions, the AV manual, and the ILSFA website. This section summarizes their responses.

Approved Vendor Training Sessions

All respondents reported that they or another representative from their company attended at least one Approved Vendor training session.

**Table IV-24
Number of Approved Vendor Training Sessions Attended**

Number of AV Training Sessions Attended	Number of Approved Vendors
1-3 Training Sessions	8
5 Training Sessions	1
8-10 Training Sessions	2
All Training Sessions	7
Don't Know	4
Total	22

Vendors attended the training sessions virtually or in-person. One vendor reported that they attended all training sessions via webinar because the trainings were held in Chicago, which is too far a distance for them to travel from their location in Southern Illinois.

Vendors were asked how useful the training sessions were, and all but one of them reported that the sessions were at least somewhat useful.

⁷⁷ This is addressed in the Revised Long-Term Plan.

Table IV-25
Usefulness of Approved Vendor Training Sessions

Usefulness of AV Training Sessions	Number of Approved Vendors
Useful	18
Somewhat Useful	3
Not Useful	1
Total	22

A few of the vendors that found the trainings sessions to be useful provided the following additional detail.

- The training sessions were a great way to learn about the program and its requirements.
- The training sessions were useful, but this vendor was able to find all the information they needed on the website.
- The most useful training sessions, such as those about the income verification process, were held too close to the submission deadline for this vendor to really make use of the information.⁷⁸
- They appreciated the opportunity to ask questions, hear questions from other vendors, and get a general sense of the industry’s feelings about the program.
- The Q&A parts of the sessions were particularly helpful.
- In general, program implementation has been great so far. The ILSFA Program administration and training are “head and shoulders above” similar programs in other states.

One vendor that found the trainings somewhat helpful stated that an issue with the trainings was the fact that many AVs were asking vendor-specific questions that were not applicable to all attendees, but they were not sure if there is a way to address this.

The vendor that said the trainings were not useful felt that the IPA was still solidifying and changing the program guidelines at the time of the training sessions, so the training session information may not have always been accurate or up to date. Additionally, they felt that the training sessions simply provided information that was already in the AV manual, without providing any additional information or detail.

The important topics that AVs reported were covered in the training sessions are summarized in Table IV-26.

⁷⁸ The DG sub-program remains open for project submissions as of the time of the release of this Report.

Table IV-26
Important Topics Covered in Approved Vendor Training Sessions

Important AV Training Topics	Number of Approved Vendors
Project Submission Process	10
AV Registration Process	4
ILSFA Guidelines	3
Project Selection Process	2
AV Manual Revisions and Timelines	2
Job Training Requirements	1
Income Verification Requirements	1
Opportunity to Meet Program Administrator	1
AV Manual Breakdown	1

Note: Vendors could report more than one topic.

The AV that did not find the training sessions to be useful reported that they did not learn any important information from the training sessions. Six vendors could not recall the specific information they learned from the sessions.

Table IV-27 summarizes the areas that AVs recommended for future training sessions.

- With respect to project financing, one vendor noted that there is a tool on the website that helps vendors report their project financing, but it would be helpful if the ILSFA filled out the tool using information from an example project.
- Solar and ILSFA basics requested included the following.
 - Basic terminology used in the industry and the ILSFA.
 - REC definition, calculation, and payout.
 - How vendors make money through the program.
 - How consumers benefit from the program.
 - How vendors can market the program to consumers.
- One AV suggested that Elevate provide “case studies” of successful projects, which would include information on how the vendors designed the project and recruited participants, and what information was included on the submission application.

Table IV-27
Topics Recommended for Future Approved Vendor Training Sessions

Topics for Future AV Training Sessions	Number of Approved Vendors
Project Selection	3
Project Financing	2
Solar Basics	2
Project Funding Remaining	1
Identifying and Designing Projects	1

Topics for Future AV Training Sessions	Number of Approved Vendors
Technical Project Submission Information	1
Financial Project Submission Information	1
Grassroots Education	1

Note: Vendors could report more than one topic.

Other AV recommendations for the training sessions are summarized in Table IV-28. Additional detail on discussion and mentorship recommendations is provided below.

- Host small group sessions, in which vendors can discuss their experiences and ask each other questions. These sessions could increase vendor success in the program by allowing them to share ideas and strategies.
- Provide a mentorship program that connects ILSFA developers with no prior solar experience to experienced solar developers outside of Illinois. Though Elevate is encouraging AVs in the ILSFA Program to connect with each other, the experienced ILSFA AVs may not want to help the less experienced AVs because they are competing for project selection.

Table IV-28
Other AV Training Session Recommendations

AV Training Sessions Recommendations	Number of Approved Vendors
More Frequent, Shorter Training Sessions	2
Discussion and Mentorship Opportunities	2
Training Sessions in Springfield	1
Request Portal Familiarity Before Attending	1
Record Training Sessions	1
Provide Written Training Summary	1

Note: Vendors could recommend more than one topic.

Approved Vendor Manual

Twenty of the 22 AVs reported that the AV manual is at least somewhat helpful. A few vendors that found the manual helpful or very helpful provided the following detail.

- It is generally the first resource they use to find information.
- They appreciate the ability to “control f” and find the information they need in the manual. It is a useful resource because they can reference it at any time.
- The manual has a large amount of information, but the hyperlinks in the PDF make navigation easier.

One vendor that found the manual somewhat helpful noted that it is very detailed, but it does not provide sufficient information about what should be included in the registration application. For example, the manual does not include guidelines about the exact information Elevate is looking for in response to the community engagement questions.

The vendor that did not find the manual to be helpful stated that it was too lengthy and detailed to be useful.

**Table IV-29
Helpfulness of Approved Vendor Manual**

Helpfulness of Approved Vendor Manual	Number of Approved Vendors
Very Helpful	8
Helpful	9
Somewhat Helpful	3
Not Helpful	1
Don't Know	1
Total	22

Vendors were asked whether they are able to find the information they need in the manual, and they provided the following responses.

- 20 vendors are able to find the information they need.
- 1 vendor is sometimes able to find the information they need, when the topic is “easily searchable”.
- 1 vendor has never tried to find information in the manual because they are able to find the information they need on the ILSFA website.

A few of the vendors that are able to find the necessary information in the manual provided the following additional detail.

- Three vendors sometimes ask Elevate for assistance in locating information in the manual. Once Elevate directs them to the right place, they are able to obtain the information they need.
- One vendor reported that there were a few “line items” in the manual that were too vague and consequently could be interpreted differently by each reader. When they encounter these areas of the manual, they contact Elevate for clarification.

Table IV-30 displays the frequency with which AVs refer to the AV manual.

**Table IV-30
Frequency of Use of Approved Vendor Manual**

Frequency of Use of AV Manual	Number of Approved Vendors
Frequently – Daily to Weekly	14
Initially Frequently, Now Less Frequently	2
Infrequently	6
Total	22

Vendors provided recommendations for the manual to consolidate the information in the manual, make it easier to navigate, and clarify the registration and project submission processes.

- Improve organization of the manual.
 - Clearly state the most important points that vendors will need to know for project submission. Currently, the program requirements are scattered throughout the manual, which makes it difficult to find the necessary information.
 - Format so that key items, such as project size requirements, are easier to find.
 - Include clickable links to other vendor resources.
 - Provide information in the manual in the same order as the questions on the registration and project submission applications to make information in the manual easier to find.
 - Add an appendix that shows the step-by-step process of project submission. This could include examples of submission-worthy documents.
- Provide summaries and samples.
 - Provide sample project submission reports/forms in the manual so that vendors can have a better idea of what Elevate is looking for in each document.
 - Provide information on the exact information that should be included in the registration applications so that Elevate does not need to request additional information from vendors.
 - Provide a video that consolidates the most important aspects of the ILSFA Program and the AV Manual.
- Send notifications whenever a revised manual is published.⁷⁹

Table IV-31
Recommendations for Approved Vendor Manual

Recommendations for AV Manual	Number of Approved Vendors
Improve Organization	5
Provide Summaries and Samples	3
Send Notification When Revision Published	1

Note: Vendors could provide more than one area of recommendation.

Two vendors that did not make any recommendations provided the following additional detail.

- The manual is already quite comprehensive.
- They were impressed with the amount and quality of thought that went into the program and manual design.

ILSFA Website

Fifteen of the 22 vendors reported that they use the ILSFA website frequently (from daily to weekly). The remaining seven vendors reported that they did not use the website frequently.

⁷⁹ Elevate reported that announcements are sent and direct emails are also sent to AVs.

Table IV-32 summarizes the uses that AVs reported for the ILSFA website.

Table IV-32
Use of ILSFA Website

Use of ILSFA Website	Number of Approved Vendors
Project Dashboard	6
EJ and LI Maps	6
AV Manual and Other AV Resources	5
ILSFA Brochure	3
Program Updates	3
Funding Updates	2
AV Registration & Project Submission	2
Forms and Contracts	2
Access Portal	1
Answer ILSFA Questions	1

Note: Vendors could provide more than one area of use.

All AVs reported that the ILSFA website is at least somewhat useful. Two AVs specifically noted that they appreciate the “For Vendors” page of the website. A few vendors provided the following additional detail about the website’s usefulness.

- The website is very easy to use and easily searchable. It is one of the best parts of the program.
- There is a lot of information that can be accessed without having to log in, which improves the transparency and reliability of the program.
- The website was useful when they were initially looking for information about the program.
- It is useful, but it is not very user-friendly, so it can be hard to find information.
- The current website structure (i.e. an “announcements” page, an “events” page, and a “for vendors” section) is not very intuitive for users.

Table IV-33
Usefulness of ILSFA Website

Usefulness of ILSFA Website	Number of Approved Vendors
Very Useful	4
Useful	12
Somewhat Useful	6
Total	22

Vendors made the following recommendations for the project dashboard on the website.

- Two vendors would like the ILSFA Program to clearly provide information about how much funding is left in the program on the project dashboard.
 - One vendor specified that this should show the amount of funding that is pending distribution, that has already been distributed, and that is still unclaimed.
- Two vendors would like Elevate to update the dashboard more frequently (daily, weekly, or every two weeks) so that vendors can have more up-to-date information about the funding remaining in each sub-program. One vendor specified that Elevate should tell vendors how frequently the dashboard will be updated.

Vendors made the following recommendations for consumers to connect with vendors through the website.

- Indicate the types of projects that vendors are pursuing so that consumers can easily identify which vendors they can contact.⁸⁰
- Add a tool that allows potential low-income clients to enter their address or zip code and see which AVs are willing to work in their area.

Vendors would like to see the following additional information on the website.

- Version numbers on downloadable documents.
- AV template for the required workforce training reporting.
- Frequently Asked Questions page for AVs and for consumers.
- Menu, to make it easier to find information.
- Up-to-date graphic of the program timeline, including past and future submission windows.

When asked how else they felt the website could be improved, vendors provided the following recommendations.

- Make the website more user-friendly.
- Create a separate website for Approved Vendors. This way, the information that is most pertinent to AVs can be prominently featured on the web page.
- Fix the EJ community lookup tool. This vendor reported that they are currently unable to input an address into the tool to determine whether the address is in an EJ community.⁸¹
- Make the ribbon at the top of the website smaller when scrolling through the page. Currently, it takes up a large part of the screen when scrolling.

Stakeholder Outreach and Feedback

This section summarizes vendors' responses to questions about the stakeholder outreach and feedback process.

Twelve of the 22 vendors reported that they were aware of opportunities to participate in the stakeholder outreach process for the ILSFA Program. Three of the ten vendors that were not

⁸⁰ This information is available on the ILSFA website.

⁸¹ Many reported that this tool currently works well.

aware of the stakeholder outreach noted that though they personally were unaware, someone else from their company may have been aware.

Table IV-34 summarizes how AVs learned about the opportunities for stakeholder participation.

**Table IV-34
Stakeholder Outreach Awareness**

Source of Stakeholder Outreach Information	Number of Approved Vendors
Email	11
Elevate Energy	1
ILSFA Working Group	1
Not Aware	10

Note: Vendors could provide more than one source of information.

Eight of the twelve vendors that were aware of the stakeholder outreach process reported that they participated in the process. The four vendors that were aware of the process but did not participate provided the following reasons for their nonparticipation.

- They were too busy to attend any of the stakeholder outreach sessions.
- They only received notice for one stakeholder outreach event, but they were busy that day so could not attend. This was a one-time scheduling conflict, and they do not anticipate any future barriers to participation.
- They felt that they were not experienced enough in the solar field to provide feedback.
- After reviewing the materials that were posted about the ILSFA, they chose not to participate in the stakeholder outreach process because they did not have any concerns about the provided information. However, they plan to participate in future stakeholder outreach opportunities, now that they have gone through the submission and selection process.

All twelve vendors that were aware of opportunities to participate in stakeholder outreach reported that the program provided sufficient notice to participate. Nine of these 12 vendors reported that there were no barriers to their participation. The three vendors that did experience barriers provided the following detail.

- The deadline for stakeholder feedback was too close to the project submission deadline.
- The only barrier to participation was this vendor's lack of familiarity with the solar industry.
- The short window to provide feedback was a barrier because they are a small organization, and it can be challenging for them to stay abreast of all the feedback opportunities and webinars about the ILSFA Program.

The two vendors that felt that the deadline to submit feedback was a barrier provided the following recommendations.

- Set the deadline for feedback at least ten days after the project submission deadlines. This will allow vendors to give feedback based on their recent experience submitting their projects.
- Create a place to provide feedback in the portal.
- Lengthen the feedback submission window.

Vendors that participated in the outreach process were asked which parts of the outreach process they participated in/submitted comments about. They provided the following responses.

- “All parts” of the process (2 vendors)
- The Revised Long-Term Renewable Resources Procurement Plan (1 vendor)
- MWBE certification (1 vendor)
- Solar Investment Tax Credit eligibility (1 vendor)
- Don’t recall (3 vendors)

Two of the eight vendors that participated in stakeholder outreach noted that they also provide feedback through participation in the ILSFA Working Group.

Several of the vendors that participated in stakeholder outreach provided the following additional detail about the feedback they submitted.

- They provided feedback on the fact that the program is less feasible for vendors and projects in rural Illinois. For example, Carbondale has an EPA-designated brownfield within city limits, but (for reasons unknown to the vendor) it has been unable to self-designate as an EJ community.
- It is unrealistic to expect community organizations to participate without the assistance of an experienced solar installer or AV in the ILSFA because less experienced installers/AVs do not have the knowledge, systems, or working capital to finance projects that have no upfront costs for participants.
- Developers should be able to apply for EJ community self-designations on behalf of communities they are working with. Even if the community organization submits the application, the AV (or developer) still writes the document for the potential beneficiary (e.g., church, resident) to submit.
- Initially, the ILSFA Program would only accept MWBE certifications from state, county, or federal agencies. However, there are some non-governmental agencies that also provide this certification, and utility companies like ComEd will accept certifications by these agencies. Therefore, the vendor suggested that the ILSFA Program accept any MBWE certification approved by utilities, even from non-county/state/federal agencies. This recommendation was adopted.

The eight vendors that participated in stakeholder outreach reported that the following factors contributed to their ability to participate.

- Sufficient notice of feedback opportunities (5 vendors)
- The option to submit feedback virtually (3 vendors)
- Notification of opportunities via email (1 vendor)

- Ability to attend sessions via webinar (1 vendor)

Table IV-35 summarizes information on whether AVs felt that their ideas were heard and taken into account and whether they had an impact on the ILSFA Program.

Two of the vendors that did not feel like their ideas were heard and taken into account provided the following additional detail.

- They will likely provide less feedback in the future, due to the lack of responsiveness.
- They never received confirmation from the IPA about whether their letter was received.

**Table IV-35
Stakeholder Participation and Impact**

Vendor Response	Ideas Heard and Taken Into Account	Impacted ILSFA Development
Yes	4	6
No	3	12
Unsure	1	4
Did not Participate	14	--
Total	22	22

Grassroots Education

This section summarizes vendors' responses to questions about the Grassroots Education component of the ILSFA Program.

All 22 interviewed vendors reported that they were aware of the Grassroots Education initiative, though three of the vendors noted they were not very familiar with the specifics of the initiative.

Table IV-36 summarizes responses about AV participation in Grassroots Education activities and impact of Grassroots Education.

**Table IV-36
Participation in Grassroots Education Activities**

Grassroots Education Activities	Participated in GE Event	Received ILSFA Interest and Questions as a Result
Yes	4	4
No	15	13
Don't Know	3	5
Total	22	22

Some of the vendors that had not participated in any Grassroots Education activities provided the following detail.

- They are in Southern Illinois, and none of the events have been located close to them. They were invited to one event in downstate Illinois, but it was still located two hours away, so it was not feasible to attend.
- They were connected to job trainees for their project after contacting a Grassroots Educator.
- They have been receiving regular emails from one of the Grassroots Educators, but they have not attended any of the Educator's events. The vendor was disconcerted by the fact that this Educator was asking vendors if they would be willing to pay for access to a list of interested customers.⁸²

Three of the four vendors that had participated in Grassroots Education activities provided the following information about the events they attended.

- They attended a meeting in the Pilsen neighborhood of Chicago. They were invited by the Educator to answer customer questions.
- They participated in a local event held at the nearby community housing authority. However, they are based in Southern Illinois, and there are not many Grassroots Education events in their area.
- They participated in a few events and meetings with Grassroots Educators. One of the Educators connected them with a non-profit anchor for one of their CS projects.

AVs that attended Grassroots Education events were asked how helpful they felt those activities were, and three of the vendors reported that the activities were at least somewhat helpful.

- 1 vendor reported that the activities were helpful. The vendor elaborated that the event seemed to generate interest in the program among attendees, and they were able to get contact information from clients who were interested in the program.
- 2 vendors reported that the activities were somewhat helpful.
 - One vendor elaborated that the Educator did a nice job explaining the program; however, there were only two attendees. Additionally, it seems that Grassroots Educators are frustrated because they are unable to connect customers with vendors that are willing to do single-family DG projects in their service territory.
 - The other vendor noted that because the program is still in the early stages of implementation, the Educators do not have much experience or knowledge about solar and the ILSFA Program, but this will improve as the program continues.
- 1 vendor reported that the activities were not helpful and explained that the event was focused on homeowners and renters interested in the DG sub-program, which this vendor is not pursuing.

Four AVs that had not received inquiries as a result of Grassroots Education, and two vendors that were unsure if they had, reported that they had received interest and questions as a result of other marketing initiatives. These other marketing methods were as follows.

⁸² One of the Grassroots Educators was considering the creation of a referral service to connect AVs with job trainees for a fee. This was pursued prior to the time that the organization became a Grassroots Educator. The organization agreed not to pursue this activity any further as a condition of becoming a Grassroots Educator.

- Being listed on the ILSFA website (5 vendors)
- Advertising through the Black Pages (1 vendor)

Vendors recommendations for community educators to generate more interest in the ILSFA are summarized in Table IV-37.

Table IV-37
Recommendations for Grassroots Education

Recommendations for Grassroots Education	Number of Approved Vendors
Connect AVs with Potential Customers	3
Focus More on DG Sub-Program	2
Invite Successful Participants to Speak at Events	1
Connect AVs with Job Trainees	1
Conduct More Visible Outreach	1
Target Communities Most Likely to Benefit	1
Hold One-on-One Meetings with AVs	1

Note: Vendors could provide more than one area of recommendation.

Additional comments about Grassroots Education were as follows.

- Educators should stop generating interest in the program because the program is running out of funds.⁸³ The vendor does not want interested consumers to be disappointed when they realize there are no projects in which they can participate.
- More projects should be established before vendors or community educators can effectively market the program to customers.
- Illinois consumers are particularly skeptical of programs like the ILSFA Program because of negative experiences with Alternative Retail Energy Suppliers (ARES) after the electric market in Illinois was deregulated.

⁸³ This is not accurate for DG projects. The ILSFA is organized by program years and subsequent program years will have additional funds available.

V. Stakeholder Outreach Design and Feedback

This section summarizes the findings related to stakeholder outreach. Findings in this section are based on review of ILSFA Program materials available on the website, interviews with the IPA and Elevate Energy managers and staff, the ILSFA Evaluation Workshop held on December 10, 2019, interviews with 11 ILSFA Program stakeholders who participated in the stakeholder feedback process, and with seven ILSFA Program stakeholders who did not participate in the process.

This section provides information on the stakeholders' views and opinions. As these statements were made by stakeholders, and they may not have a complete understanding of all details of the ILSFA Program design and requirements, some of the statements in this section may be inconsistent with the statutory requirements of the ILSFA and/or the ICC-approved ILSFA Program design. Additionally, recommendations in this section are those made by the stakeholders, and may not represent the opinions of APPRISE or the IPA.

A. Overview

Stakeholder engagement is an important aspect in the development and implementation of the Illinois Solar for All (ILSFA) Evaluation. The Future Energy Jobs Act (FEJA), which required the development of this program, specifically stated that an objective was to include interaction with stakeholders.

Stakeholders for the Illinois Solar for All Program include the following.

- Environmental Justice Communities
- Low-Income Households
- Affordable Housing Owners
- Job Training Organizations
- Job Trainees
- Community Organizations
- Non-Profit and Public Sector
- IL Commerce Commission
- Investor-Owned Electric Utilities

The IPA began workshops and solicitation of stakeholder feedback in May 2017. Many opportunities for feedback were related to the Long-Term Plan, Grassroots Education, Approved Vendor registration, EJ community designation, third party evaluation, job training requirements, participant eligibility and verification, quality assurance, REC contracts, project selection, and the Community Solar Pilot sub-program.

Elevate reported that they had good attendance at the stakeholder outreach presentations, ranging from 60 to 70 attendees at the smaller events and up to 120 at the larger events, depending on the subject matter.

Much of the stakeholder feedback has come through the ILSFA Working Group, a coalition of many organizations which provides a single comment document for each topic that has been filtered through a consensus-building process. It may be useful for the IPA and Elevate to receive a wider variety of comments that express the diverse viewpoints that are likely to exist within the Working Group. In some cases, individual groups within the ILSFA Working Group sent additional feedback.

The ILSFA Program adopted many of the recommendations received in the stakeholder feedback process.

B. Stakeholder Evaluation Workshop

FEJA directed that, “At least every two years, the Agency shall select an independent evaluator to review and report on the Illinois Solar for All Program and the performance of the third-party program administrator of the Illinois Solar for All Program. The evaluation shall be based on objective criteria developed through a public stakeholder process. The process shall include feedback and participation from Illinois Solar for All Program stakeholders, including participants and organizations in environmental justice and historically underserved communities.”

The IPA held a Third Party Evaluation feedback session on January 29, 2019, posted the session and video on the ILSFA website, and invited written comments on the information. The session reviewed the statutory framework and reporting requirements, performance measurement, evaluator qualifications, and the evaluator selection process. The IPA sought feedback on the scope of the evaluation and evaluator requirements.

Comments on the evaluation were received from the ILSFA Working Group. They emphasized the need to give the program time to develop and address barriers prior to shifting funds between sub-programs. They also noted the following.

- While the job training programs are separate from the ILSFA, the evaluation should assess how the job training is working and make recommendations even if they are not within the IPA’s or Program Administrator’s control. Data should be collected on salaries, job types, and coordination between solar companies and job training providers.
- Additional breakdowns beyond those discussed by the IPA should include rural, suburban, and urban; and homeowners and renters. The evaluation should also examine the scores of the EJ communities where projects are located.
- The evaluation should look at multiple definitions of low-income.
- The evaluation should assess whether systems are owned by the participants.
- The evaluation should measure additional non-energy benefits including community pride and other measures of well-being.

- Program Administrator assessment should include success of outreach that is undertaken, education of program vendors, and surveys with Approved Vendors.
- The evaluator should have experience with low-income and environmental justice programs, solar programs, jobs programs, and in Illinois. The evaluator should also have experience in public participation and community engagement.

Because of the importance of stakeholder feedback in the ILSFA, the evaluation included two stakeholder workshops to engage stakeholders in the process and seek their feedback on the evaluation plan and the final report.

The first workshop to seek input on the evaluation was held on December 10, 2019 in Chicago, and participants were also given the opportunity to participate by webinar. Approximately 20 attended in person and 37 attended the webinar.

The presentation covered the following topics.

- APPRISE Background
- ILSFA Overview
- Phase I Evaluation Research Conducted, Findings, and Recommendations
- Phase II Evaluation Plan Metrics, Research Activities, and Timeline

Questions were fielded throughout the presentation to allow for a more interactive format. Following the presentation there was significant time for additional questions and discussion.

Many of the questions that were asked focused on the design and implementation of the ILSFA rather than on the evaluation, the findings, and future evaluation research. The IPA and Elevate participated in the response to questions that were more related to program design and implementation than to the evaluation.

Questions and comments related to evaluation were raised in the following areas.

- Utility interconnection agreements and cost
- MWBE vendor participation
- Vendor diversity (awarding projects to a greater number of vendors)
- Stakeholders who participated in the feedback process
- Projects in Ameren and ComEd territories
- DG sub-program barriers (and specifically to multi-family), participation, and eligibility
- Bringing more vendors into DG
- Grassroots Education and educators
- Coordination with energy efficiency providers and mitigation providers
- Knowledge of ILSFA among energy efficiency providers
- Economic benefit calculation
- Small number of CS projects selected
- Quantification of ILSFA savings

Questions and comments related to program design and implementation were as follows.

- EJ community designations
- Locations of selected projects
- Coordination of ILSFA and utility interconnection timelines
- MWBE point awards
- Approved Vendor list, territories, and sub-programs
- AVs partnerships with installers
- ILSFA website feedback
- Status of selected projects
- Job training programs
- ILSFA budget (compared to ABP budget)
- Interconnection agreement requirement
- Project design flexibility
- ILSFA barriers

Following the workshop, an announcement was posted on the ILSFA website and emailed to the subscriber list. The announcement provided the following information.

- Comments on the presentation, especially feedback on additional metrics that the evaluation should address, were requested by January 3, 2020. (No comments were received in response.)
- Link to ILSFA Evaluation Presentation PowerPoint
- Link to ILSFA Evaluation Presentation Recording
- Link to the ILSFA Phase I Evaluation Report

The discussion during the workshop showed that many are still confused about aspects of the ILSFA and have concerns about program requirements, access by minorities and underserved communities, barriers to participation, and lack of participation in the DG sub-program. Several questions addressed the difficulty of locating information on the ILSFA website and the need for greater outreach to underserved communities.

C. Stakeholder Interview Methodology

The Phase I Evaluation targets for the stakeholder interviews included representatives from the ILSFA Working Group and individuals and organizations that responded to invitations to comment on ILSFA Program guidelines and materials. This second round of research targeted those individuals, but also included potential stakeholders who had not participated in the feedback process.

The following numbers were identified in each group and targeted for interviews.

- Participating Stakeholders
 - Low-Income Community Solar Pilot Commenters: 2 targeted
 - ILSFA Working Group Members and Other Earlier Commenters Not Interviewed Phase I: 2-3 targeted
- Nonparticipating Stakeholders

- Community Action Agencies: 3-4 targeted
- Environmental/Solar Organizations: 3-4 targeted
- Low-Income Advocacy Organizations: 3-4 targeted
- Neighborhood Organizations: 3-4 targeted
- Solar Companies: 3-4 targeted

The following interviews were conducted.

- Participating Stakeholders
 - Three interviews were conducted with non-profit advocacy organizations that focus on environmental protection and social and economic justice.
 - Three interviews were conducted with solar consultants and sub-contractors.
 - Two interviews were conducted with ILSFA Approved Vendors.
 - Two interviews were conducted with ILSFA Grassroots Educators.
 - One interview was conducted with an equity housing cooperative.

- Nonparticipating Stakeholders
 - Three interviews were conducted with Community Action Agencies that provide energy assistance, weatherization assistance, housing assistance, and other forms of assistance to low-income households.
 - Two interviews were conducted with non-profit advocacy organizations that focus on environmental protection and sustainability.
 - Two interviews were conducted with local government agencies with responsibilities for providing energy, weatherization, and housing assistance to low-income households.

D. Nonparticipating Stakeholder Interviews

Six of the seven nonparticipating interviews were conducted with the Executive Director or CEO of their organization, responsible for overseeing all of the operations. The other interviewee was on the management team at her organization and is responsible for writing state and federal grant applications.

Stakeholders were asked if their organization conducts advocacy work or typically participates in opportunities to offer comments on public programs. Six interviewees said their organization frequently participates in advocacy and public feedback and one interviewee indicated their organization occasionally engages in those types of activities.

Stakeholders were asked about their understanding of the ILSFA design.

- Three said they had a very basic understanding of the ILSFA.
- Three said they had heard about the ILSFA but did not know much about it.
- One said that she had not heard of the ILSFA Program.

Respondents were asked if anyone at their organization had attended any of the informational meetings that were held during the ILSFA Program development process. Six respondents reported they had not attended any sessions and one respondent said she had not attended, but could not say for sure whether anyone else at her organization had done so.

When asked if they had listened to the online recordings of the information and/or feedback sessions posted on the ILSFA website, all seven respondents indicated they had not.

Stakeholder Outreach Process

Nonparticipating stakeholders were asked if they were aware that there had been several opportunities to provide feedback on the ILSFA. All seven of the respondents indicated they had not been aware of such opportunities.

Stakeholders offered the following comments when asked where they might expect to learn about opportunities to provide feedback on the ILSFA.

- Three said they would expect to receive notifications from ILSFA directly.
- Two said they might hear about ILSFA through the Illinois Commerce Commission.
- One said they would expect to receive communications through the state housing authority.
- One said they would expect to hear about ILSFA through their membership in an association for Illinois Community Action Agencies.

Stakeholders were asked if they felt the program had provided a sufficient amount of outreach to encourage stakeholder participation in the ILSFA development process. Six of the respondents said they did not feel the outreach effort had been sufficient given their lack of awareness of the opportunities to participate. The remaining respondent said that she did not know whether the outreach had been sufficient because she did not know what outreach efforts had been undertaken.

When asked if they felt the program could have taken other actions to solicit additional stakeholder feedback, all seven respondents indicated that the program could have done more. They recommended the following additional outreach actions.

- Four felt that the ILSFA Program should be reaching out to relevant stakeholder organizations directly via email, phone, and mail.
- One said that the ILSFA should be tapping into larger networks such as the Illinois Association for Community Action Agencies.⁸⁴

Stakeholders were asked if there had been any barriers to their participation in the ILSFA development process.

- Four said that a lack of awareness of the opportunities to participate was the primary barrier to their engagement.
- One said that a lack of funding and limited personnel were barriers to their participation.
- One said that not knowing if their community would meet the low-income qualifications for the program was a barrier to their engagement.

When asked if their organization planned to provide feedback on the ILSFA in the future, six respondents said that they would provide feedback if they are made aware of

⁸⁴ Elevate reported that they provided an overview of the ILSFA Program at a CAA meeting on 5/7/2019.

opportunities to do so. The remaining respondent said that they do not see any benefit to providing feedback this far along into the program.

Respondents were asked if they had any other comments on the stakeholder outreach process or stakeholder participation. Two respondents did not have further comments to add, while five respondents indicated they would like to learn more about the ILSFA Program. Those that indicated a desire to learn more offered the following details.

- Two said that ILSFA should reach out to the Illinois Association for Community Action Agencies and that they would be happy to pass along the relevant contact information.⁸⁵
- One said that phone or email were the best ways to reach her and that she would like to be alerted when ILSFA informational events are scheduled.
- One said that an ILSFA representative should present at the annual conference for Habitat Illinois.
- One recommended that ILSFA include information in the “Earth Connect Newsletter” that is sent out to environmental non-profit organizations.

ILSFA Design and Implementation

Nonparticipating stakeholders were asked if they had any specific comments on the four ILSFA sub-programs. Six said they did not know enough about the ILSFA Program to comment on the sub-programs.

Stakeholders were asked if they had any comments on the Grassroots Educator selection or role and if they felt that Grassroots Educators are meeting the goals of reaching hard-to-serve communities across the state. They offered the following responses.

- Five said that they did not know enough about ILSFA Grassroots Education to provide comments.
- One said that Grassroots Education will be most effective if educators focus on working through community organizations and groups working to provide low-income energy assistance rather than trying to contact individuals.
- One said they should be canvassing neighborhoods, hosting community events, and leaving flyers at CAAs where low-income residents come to sign up for energy assistance.

When asked if they had any comments on the guidelines and materials that have been developed for the ILSFA, all seven respondents said they had not seen or received any such materials.

ILSFA Evaluation

Nonparticipating stakeholders were asked if they had any comments on the ILSFA’s key evaluation metrics (Installations, Capacity, Costs, Jobs Created, and Non-Energy Impacts). They offered the following responses.

- Four said they did not know enough about the evaluation metrics or evaluation process to provide comments.

⁸⁵ Elevate reported that they provided an overview of the ILSFA Program at a CAA meeting on May 7, 2019.

- One said that the metrics for Community Solar should include the number of people served, the number of farms created, and the geographic location relative to other projects (i.e. ensuring that projects are dispersed around the state). This respondent also said that the metrics should compare cost of installation to realized savings in order to determine the overall effectiveness of each project.
- One said that the installed capacity metrics should be broken down by sub-program and also that the quality of the jobs created, and the demographics of the people selected to fill those jobs, need to be monitored carefully (i.e. ensuring that women, minorities, and low-income residents are benefitting from the job creation).
- One said that the evaluation metrics need to include measures to determine whether participating low-income households are actually experiencing savings, and if so, by what percentage.

ILSFA Recommendations

Respondents were given the opportunity to provide any other comments or recommendations for the ILSFA Program. They offered the following responses.

- Six of the respondents said that the ILSFA should increase their outreach efforts and do more to ensure that CAAs and non-profits, as well as targeted municipalities, are receiving direct contact from ILSFA representatives. They feel it is important to reach out to stakeholders directly rather than expecting them to discover the program on their own.
- One respondent said he is concerned about the ongoing availability of funding for the Future Energy Jobs Act (FEJA). He feels that the uncertainty surrounding future funding makes it unappealing for small businesses to commit to projects and could create disastrous consequences for low-income households that buy into projects that fail when the funding dries up. He feels that measures need to be taken to ensure that funding continues to flow.⁸⁶

E. Participating Stakeholder Interviews

Stakeholders provided information on how they had participated in the feedback process.

- Seven said they had offered public comments during the designated submission window.
- Five said they had attended a meeting or workshop where they were able to provide feedback.
- Four said they were involved in the ILSFA Working Group.
- Three said they could not say for certain because they were not the person at their organization who had participated in the ILSFA feedback process.

Respondents provided more detail when asked about specific participation opportunities.

- Eight of the 11 participating stakeholders who were interviewed said that they had attended presentations regarding the ILSFA Program. Respondents reported that these presentations included basic information on the ILSFA design and grassroots education efforts.

⁸⁶ ILSFA has an annual program year structure with funding identified for each program year. It is not impacted by broader funding issues facing other aspects of the Illinois RPS.

- Seven said they had listened to recordings of the information and/or feedback sessions posted on the ILSFA website.
- Seven said they had offered comments on the ILSFA and two respondents said they personally had not offered comments but did not know whether anyone else at their organization had done so. The comments that respondents provided covered the following topics.
 - Three said the ILSFA should do more to mitigate the systematic barriers preventing people of color and extremely low-income households from participating in the program. For example, they pushed for the ILSFA to include funding for roof repair.⁸⁷
 - Two lobbied to loosen the income verification requirements for low-income participants, especially in the DG sub-program.
 - One expressed concern that designating Environmental Justice communities using census tracts was improperly segregating communities that would otherwise be viewed as a whole.
 - One recommended simplification of the Consumer Benefit Calculation.
 - One opposed re-allocating the ILSFA budget to provide more funding for CS projects and less funding for DG projects.
 - One submitted several recommendations regarding Grassroots Education.

When asked if their organization planned to provide feedback on the ILSFA in the future, all 11 indicated that they plan to continue providing feedback.

Stakeholders were asked about their understanding of the ILSFA design.

- Three said they had a good understanding of the ILSFA.
- Four said they had a decent understanding of the ILSFA.
- Four said they had a basic understanding.

Respondents offered the following additional details about their understanding of the various components of the ILSFA design.

- Two felt least qualified to discuss the Non-Profit and Public Facilities sub-program.
- Two were only familiar with the Low-Income CS Pilots sub-program.
- One said his organization was not familiar with Low-Income CS projects of any kind.

Stakeholder Outreach Process

Participating stakeholders were asked how they had learned about opportunities to provide feedback on the ILSFA Program. They offered the following sources of information.

- Three learned about feedback opportunities via emails from the IPA.
- Two heard about feedback opportunities through the Illinois Solar Energy Association.
- One read about the stakeholder feedback process on the ILSFA website.
- One heard about ILSFA feedback opportunities at an informational event for Approved Vendors in the ABP.

⁸⁷ The ILSFA Program only provides for the purchase of RECs.

- One learned about the feedback sessions while working as a consultant for an ILSFA Approved Vendor.
- One learned about feedback opportunities through the Illinois Clean Energy Jobs Coalition.
- One heard about opportunities to provide feedback from a member of the Cook County Board of Commissioners.

Stakeholders were asked if they felt the ILSFA Program provided a sufficient amount of outreach to encourage participation in the development process.

- Five felt that the outreach efforts were sufficient.
- Two said that the outreach had not been sufficient, especially in minority communities.
- Four did not feel like they had enough information about the outreach efforts to answer this question.

When asked if they felt the ILSFA Program could have taken any other actions to solicit additional stakeholder feedback and participation, eight of the 11 participating stakeholders said that the program could be doing more. They recommended the following actions to improve participation.

- Two said the ILSFA should engage in grassroots organizing to demonstrate a genuine interest and commitment to low-income communities.
- Two said the program should engage more stakeholders from minority communities by advertising on Black media outlets and building relationships with local elected officials and church leaders.
- One said the program should shift its outreach efforts from DG projects to CS and NP/PF projects to encourage more participation from community-based organizations.
- One said the program is at the point where they should be shifting outreach efforts away from workforce development programs that are already largely engaged and focus instead on organizations that work with potential low-income participants.
- One said the program should engage a greater number of potential vendors by publishing their RFP's to a wider audience. For example, they could advertise to vendors in the Coalition for Community Solar Access.

Stakeholders were asked if there were any barriers to their participation in the ILSFA development process. Five respondents said they experienced barriers, four respondents said they did not experience barriers, and two respondents said they did not know if their organization had experienced barriers. The respondents who said they experienced barriers offered the following additional details.

- Two said that due to systematic/structural racism, ILSFA outreach efforts have been focused mainly on low-income white communities at the expense of African American and other minority communities.⁸⁸

⁸⁸ Our analysis did show that communities with Grassroots Education events had a lower percentage minority composition. While cities with GE events had an average minority composition of 14 percent, cities without GE events had an average minority composition of 21 percent. While 73 percent of the cities with GE events had less than 10 percent minority composition, only 41 percent of census tracts without GE events had less than ten percent

- One said that information on feedback opportunities was not very specific and difficult to find.
- One said that the complexity of the ILSFA brochures is a barrier to participation because they are cumbersome to read and make the program seem unappealing to stakeholders and potential participants.

Stakeholders provided the following additional comments on the stakeholder outreach process.

- Two said the ILSFA needs to do more to encourage the participation of minority and low-income community members and organizations, including offering financial incentives to help offset the costs incurred by taking time away from work to participate.⁸⁹
- One said that the ILSFA brochures and marketing materials should be simpler so that the program seems more salient and appealing to relevant stakeholders in the low-income community.
- One recommended an informational event targeted specifically at housing cooperatives in the Chicago area.
- One stated that the Illinois State Government should do more to promote the program using known entities such as the Illinois Department of Energy.
- One commented that the outreach efforts had been excellent.

Stakeholder Participation

Participating stakeholders were asked if they felt there was sufficient stakeholder participation in the ILSFA development process.

- One respondent said that stakeholder participation had been sufficient.
- Three said it had not been sufficient.
- Three said they did not know enough about the overall level of stakeholder participation to comment.

Respondents who felt that stakeholder participation had been insufficient were asked where additional participation was needed. They offered the following areas for improvement.

- One said that the ILSFA needs to build better relationships with members of minority communities.
- One said that the ILSFA needs to obtain more feedback from grassroots educators and community-based organizations.
- One said that there was not enough participation from faith-based organizations and labor unions.

Respondents were asked if they felt the program was open to feedback and ideas from stakeholders.

- Six said the program was open to feedback.

minority composition. However, the analysis only allowed for an examination of the city as a whole, as the specific address for the event was not available.

⁸⁹ The ILSFA Program does not provide funding for this purpose.

- One said it was not open to feedback.
- One respondent said they did not know enough to comment on the program's openness to feedback.

Interviewees were asked if they felt the program responded appropriately to stakeholder comments.

- Four said that the responses they received had been appropriate.
- One said the program's responses to his comments were not appropriate because they failed to address the issues he raised on multiple occasions.
- One said he did not receive a direct response to his comment, but acknowledged that the issue did appear on the Evaluation Report.
- One said that the program "sometimes" responded appropriately to her comments. She attributed the lapses to the fact that ILSFA does not have a clear management structure to be held accountable.

Stakeholders were asked if they felt their ideas were heard and taken into account.

- Six felt their ideas had been heard.
- One felt that his ideas were not heard and taken into account.

When asked if they had an impact on the development of the ILSFA, four respondents felt they definitely had an impact while one respondent felt he had not had any impact at all. Additionally, four respondents said they were unsure if their organization's efforts had factored into the program's development.

Stakeholders were asked if the ILSFA had incorporated stakeholder comments into the program design where feasible and beneficial.

- Three felt their comments had been incorporated into the program design.
- One felt that some of his comments had been incorporated.
- Two felt their comments had not been incorporated at all.

Stakeholders offered the following additional comments on the stakeholder outreach process.

- One noted that he was impressed with the ILSFA stakeholder process, especially when compared to other feedback processes he has been involved in.
- One said that the ILSFA should give stakeholders more notice before opening a feedback window.
- One indicated that his organization runs a weekly radio show and invited the ILSFA to send a representative to discuss the program on the air.

ILSFA Design and Implementation

Participating stakeholders were asked if they had any specific comments on the four ILSFA sub-programs.

- Six respondents commented on DG.
 - Two acknowledged that DG projects are not popular among vendors because it is difficult to find homes that meet the income criteria and have a suitable roof.

- One said they are only pursuing DG projects and are disappointed that so few projects were funded in the first two rounds.
- One said they would like RECs to flow directly to homeowners because it is difficult to find institutions to provide loans to potential participants.
- One recommended implementing a matching service to put Approved Vendors in contact with homeowners that have been pre-approved for the ILSFA based on income and site suitability.⁹⁰
- One said that the income verification process needs to be simplified so that households without extensive documentation can still participate in the program.
- One said that smaller vendors would be more likely to engage in the ILSFA if the savings requirements were lowered.
- Three respondents commented on CS.
 - Two expressed concern that the current CS projects are all located in a select few locations. They indicated that the program should reduce the maximum project size or implement a geographic quota to ensure that CS projects are more evenly distributed across the state.
 - One said that it is not clear if CS projects refer to onsite installations on multi-family dwellings or offsite installations that anyone can subscribe to. He feels that these two types of CS projects are different enough that they should have separate regulations and applications.
- Two respondents commented on NP/PF.
 - One said that REC values need to be higher for NP/PF projects because they will be more expensive to install and operate.⁹¹
 - One said that some NP/PF funds should go to organizations that help connect job trainees and potential program participants with Approved Vendors.
- Two respondents commented on CS Pilots.
 - One said CS Pilots need to be more focused on promoting community ownership rather than just subscriptions and discounts on participants' monthly electric bills.
 - One said he is frustrated because he has been promoting CS Pilot Projects to his congregation but has yet to hear about any of these projects being built in or around his neighborhood in Cook County.

Stakeholders were asked if they had any comments on the incentive structure and levels offered by the program.

- One thought the incentives were very well aligned with the varying opportunities.
- One said that the REC values should be adjusted to match varying costs in different geographic locations. For example, it is more expensive to do installations near Chicago, so REC values should be higher in Cook County.

⁹⁰ The Revised Long-Term Plan includes a provision for the Program Administrator to explore this approach.

⁹¹ The NP/PF REC values are high for this reason.

Five stakeholders commented on ILSFA's low-income eligibility requirements.

- Four said they were pleased with the eligibility requirements and felt that 80 percent of Area Median Income would make the program accessible for many families in need.
- One said he believes that there should be a third party non-profit that handles income verification so that individual vendors do not need to handle sensitive personal documents.

Three stakeholders commented on the ILSFA savings requirements to ensure that low-income customers benefit economically from the program.

- One said she is enthusiastic about the 50 percent savings requirement.
- One said that 50 percent savings is a very noble goal but might be unattainable. He thinks there is a risk that participants will be promised 50 percent savings but will not actually realize all of those savings due to unforeseen issues.
- One respondent said that he hopes 50 percent savings is enough to keep participants satisfied with the program.

Stakeholders were asked if they had any comments on the ILSFA requirement that 25 percent of all funds be allocated to projects in designated Environmental Justice communities. All four of the respondents who chose to answer this question indicated their approval of the requirement.

Stakeholders were asked if they had any comments on the requirements for ILSFA Approved Vendors. Five vendors provided the following responses.

- Two said they were happy with the Approved Vendor requirements.
- Two said that the program should include provisions to ensure that minority-owned vendors are included in the process and that other vendors hire their workforce from minority and low-income communities.
- One said that the consumer protection guidelines concerning vendor marketing materials are too stringent. He felt that any materials that clearly are not predatory should be acceptable.⁹²

Stakeholders provided the following comments on the ILSFA's project selection guidelines.

- One thought the project selection process was fair and reasonable.
- One said the current project selection process is fine as long as ILSFA never introduces a lottery-based system.
- One expressed concern that the current project selection process does little to ensure that ILSFA projects are spread out geographically across Illinois.
- One said he thought it was an undue burden to have vendors perform a site suitability inspection prior to project submission. He believes that this burden dissuaded vendors from submitting DG projects, and explains why only one DG project was selected in the first two submission rounds.

⁹² The IPA strongly disagrees with this comment.

Stakeholders were asked if they had any comments on the GE selection or role and if they felt that GE are meeting the goals of reaching hard-to-serve communities across the state.

- One expressed appreciation for the Grassroots Education efforts.
- One said that Grassroots Educators are trying their best, but that there is still a profound lack of awareness of the ILSFA Program in low-income communities.
- One noted that the Grassroots Education efforts are strong, but that many potential participants want to get involved in DG projects, and relatively few vendors are offering these right now.
- One felt that the ILSFA should have reached out to more Community Action Agencies and encouraged them to apply.
- One expressed concern that minority-run organizations were underrepresented among the Grassroots Educators selected for the program.

Five stakeholders commented on the ILSFA guidelines and materials

- Three thought the materials should be simplified so that the target audience can easily understand the core components of the program and what will be expected of participants.
- One said the materials are decent, but that he has had a hard time finding the information and material templates every time he has visited the ILSFA website.
- One recommended that Elevate send a trained employee to all grassroots education events to answer difficult policy-related questions.

ILSFA Evaluation

Six participating stakeholders provided comments on the ILSFA's key evaluation metrics.

- Three felt the key evaluation metrics need to include the demographic makeup of participants served by each project to ensure that the program is not neglecting minority communities.
- One said the key evaluation metrics should include the number of participants served and the savings realized by participants for each project.
- One said the key evaluation metrics should include the geographic location of each project to ensure that ILSFA projects are available across the state and not just in a few select locations.

Respondents were asked to discuss anything else they thought would be important to include in the evaluation of ILSFA.

- One said that vendors and projects should be evaluated based on their ability to connect potential program participants with affordable access to credit for roof repairs and other buy-in costs.
- One would like the evaluation to report the number of program applicants that are rejected along with the primary reasons cited for those rejections.
- One said that the evaluation team should include minority evaluators and individuals who live in the affected communities.

ILSFA Recommendations

Participating stakeholders were given the opportunity to provide any final comments or recommendations for the ILSFA Program. They offered the following responses.

- One reiterated that the ILSFA brochures and informational materials need to be simplified to appeal to a wider audience.
- One indicated that the website should be reorganized to facilitate easier navigation.
- One recommended that the ILSFA provide a report specific to non-profit community organizations detailing opportunities for them to get involved in the NP/PF and CS sub-programs.
- One said the DG sub-program should be restructured so that the vendor is no longer responsible for customer identification, income verification, and aggregation. He believes that a non-profit organization should be set up to handle all of those elements to reduce the burden placed on small vendors.
- One recommended that the ILSFA reach out to organizations operating in minority communities more frequently to build a better relationship with minority community members.
- One recommended that the ILSFA hire a firm to facilitate connections between the program and members of minority communities.
- One said the size of his company, and limited access to financial resources, was a barrier to participation.
- One would like to see the ILSFA do more to encourage small businesses to participate in the program.

VI. Program Administrator Assessment

This section provides a brief summary of Elevate Energy's responsibilities in the ILSFA Program, information on challenges and accomplishments, and assessment of Elevate Energy's performance to date. Findings in this section are based upon review of publicly available material on the ILSFA website, additional program information and data provided by Elevate, interviews with the IPA and Elevate Energy staff, interviews with AVs, and interviews with participating and nonparticipating stakeholders.

A. Overview

Following approval of the Long-Term Plan, Elevate Energy was hired to administer the ILSFA Program. Elevate Energy is responsible for the DG, CS, NP/PF sub-programs. NERA Economic Consulting (NERA), the IPA's Procurement Administrator, is responsible for the CS Pilot sub-program. Because the CS Pilots were first implemented in the last quarter of 2019, the NERA assessment will not be conducted until a future evaluation report.

B. Outreach

Elevate Energy has wide-ranging responsibilities with respect to outreach to stakeholders, low-income households, energy efficiency vendors, and job training organizations. Their proposal for program administration noted specifically that they would conduct outreach to "...execute an initial awareness campaign for ILSFA that reaches all targeted stakeholder groups, including the solar industry, low-income households, job training organizations and job trainees, and community organizations across the state."

As discussed in the nonparticipating stakeholder research section, Elevate's outreach did not appear to reach many potentially important stakeholder groups. This has resulted in a lack of information about and participation in the ILSFA across many relevant organizations including Community Action Associations, low-income advocacy organizations, environmental and sustainability groups, and neighborhood organizations.

Elevate also appears to be taking a somewhat more narrow role in connection-building than one might expect, given the importance of connections in the success of the ILSFA.

- **Low-Income Households:** Elevate has stated that they hope to help the Grassroots Educators (GEs) connect with community action groups that administer energy assistance programs to disseminate messages to low-income households. They noted that it is the responsibility of the GEs to engage low income households in the areas in which they're working and that the role of Elevate Energy is mainly to mostly facilitate the content and questions. Elevate noted that they have the staff that are skilled to do the work but that their role as defined by IPA does not include this outreach. They noted that their call center and outreach coordinators are educated to answer questions, but they have been pulled back when they tried to do more proactive outreach.
- **Job Training Programs:** Elevate has held a training for AVs that discussed the job training resources. They provided advice on how to reach out and talk to these partners and what types of graduates the job training programs are developing.

- **Energy Efficiency Programs:** Elevate has created a resource guide with all of the energy efficiency programs in the state. AVs are required to share these guides with the participants. Elevate noted that the energy efficiency actors are aware of the ILSFA but that Elevate has not conducted outreach to these groups.

Future success of the ILSFA may depend on forging greater connections, and Elevate should discuss a broader outreach and communications role with these audiences to promote these important linkages.

C. Call Center

Elevate Energy has a call center to field questions about the ILSFA and provide guidance and information. They reported that since the launch of the ILSFA, the call center has received about 200 calls about the ILSFA Program. While many of the initial calls came from vendors, the call center now receives more calls from homeowners and non-profit organizations.

The initial vendor calls requested general information, inquired about the benefits of installing solar given the upfront costs, and asked how to apply to become an AV. Homeowners calls addressed whether they qualified to participate in the program given their income, what the ILSFA could do for them, and vendor referrals.

Elevate databases caller contact data in a Salesforce-driven information system that records information about every call, such as the contact date and time of the call, caller contact information, phone number, nature of inquiry, etc. This information is shared with the IPA via a monthly email, and Elevate provided these reports for the evaluation.

Elevate's call center metrics report does a very good job of providing information on the volume and type of calls handled. The report shows that from January through November 2019, a total of 248 incoming calls were handled, 31 voicemails were received, and 51 outgoing calls were made. Calls were most likely to be received from vendors, followed by homeowners and renters, and then non-profits and public facilities. The most common topics covered were general program information, AV requirements and registration, NP/PF participation, and project applications.

D. Program Materials

Elevate is responsible for developing the program manual and related documents for use by AVs. They are also responsible for assisting in the development of contracts, disclosure forms, and brochures used by ILSFA AVs and CBOs. Elevate has developed most of these materials with detailed review and edits provided by the IPA. Elevate has designed these materials to incorporate their consistent branding strategy.

Elevate developed many guidelines and materials for the ILSFA Program before and shortly after the launch within a short period of time. Users of these materials, including stakeholders, AVs, and GEs, have noted that they are complicated, unclear, and difficult to navigate. The Phase I Evaluation Report made recommendations for organization and

reading level. Elevate noted that they keep track of comments and edits and have periodically updated the AV manual.

Elevate is still in the process of implementing recommendations from the Phase I Evaluation Report. Elevate reports that they are creating a document separate to the AV manual that will detail the steps required in the project application process, but this has not yet been published. Conversation with Elevate's marketing manager found that they need to still address the usability and reading level issues. She noted that they need to develop an understanding, through research, of how to talk to the audiences, including AVs, GEs, environmental justice groups, and community members. She stated that they may also need to do brand positioning research to determine how to define and differentiate ILSFA as a brand.

E. ILSFA Website

Elevate Energy created the ILSFA website and works to ensure that all ILSFA Program information is on the website and up-to-date. They are working to make sure that the website is easily accessible on smart phones. They use Google Analytics to track how individuals use the website and respond to marketing emails.

Initial response to the website acknowledged the vast amount of information that is available, and the usefulness of that information. However, there is agreement that the website is not well-organized and information can be difficult to locate. These recommendations were made in the Phase I Evaluation report, but Elevate described only minor modifications that have been made to date.

- Added tabs to the top of the screens to help visitors navigate the site more easily and find content they are looking for.
- Moved announcements up to the top of the page so that important information can be read first.
- Updated the AV list on the website. The list previously only included the AV name and the utility territories served. It now also includes the AV's contact information, regions served, and sub-programs.

Elevate acknowledged that they had not yet made many revisions to the website based on the feedback that they received and they still need to streamline the website based on recommendations in the Phase I Evaluation Report. They noted the following planned improvements.

- They are planning to implement user-based scenarios that show how different households achieve different levels of savings via solar installation.
- They are working to update the events page to be more inclusive of all program events and timelines, not just Grassroots Educator events.
- They plan to add a resources page to the AV page to make it easier to navigate.
- They plan to reorganize the For Residents page to make information about how to participate more prevalent.
- They want to focus on how to communicate "savings" to low-income households.

- They are working to further improve the information on AVs.

The ILSFA website is the most common source of information for the ILSFA Program, and it is critical that this resource is improved for easier navigation and access to important information. This should be a priority for Elevate Energy going forward.

F. Approved Vendor Portal

Elevate Energy maintains a portal that includes information on AVs, projects, participants, and Grassroots Education.

There are several users of the database system.

- Elevate Energy, AVs, and GEs, for data entry and review
- Grid Alternatives, for job training oversight
- Shelton Solutions and Elevate Energy staff responsible for recipient verification
- Elevate Energy IT staff
- Elevate Energy Call Center staff

This portal has many uses, including the following.

- Vendors complete applications to become Approved Vendors.
- AVs submit project applications.
- AVs submit job training, income verification, and other data during later project phases.
- GEs submit information on education events.
- Elevate's call center staff enter information on calls received.

Elevate Energy designed the portal using the Salesforce platform. They have a team of developers and have also worked with external contractors to assist with the development. Elevate has noted that the system was being developed as the rules and the parameters for the ILSFA Program were still under development. They had a short window to design and implement the portal before the program went live, and some of the details and internal checks in the system were still being improved at that time. They stated that they continue to face challenges due to the fact that the requirements are still developing and the scope continues to change, with updates that need to be made on quick turnaround.⁹³

Elevate Energy reported that they worked to design the system to be as simple as possible for the users. However, they found that the AVs needed reinforcement of what is expected in each field, so they provided training sessions on this topic. The AVs reported many challenges with the portal, and Elevate's vendor managers have spent a great deal of time supporting AVs in using the portal and responding to their questions and problems.

Elevate reported that they have made some improvements to the portal since the initial implementation.

- They improved the user interface so users don't have to jump back and forth between the portal and the forms.

⁹³ The IPA noted that there have not been changes to the requirements and scope for some time.

- The vendors can now enter information directly into the database, and the database performs many of the calculations. The information that the AV can enter directly includes the make, model, quantities of AC and DC components, and the design specifications (array and site suitability conditions).
- The portal calculates production and REC values automatically, and presents them to the Approved Vendor.
- The disclosures are automated so that when the user enters information, the system generates a PDF disclosure for the vendor and then they can actually send that via an email and get it e-signed by the participant (or the AV can print it).
- Data are tracked at various points through the process. The system accommodates the data values submitted by the Approved Vendor and values edited/approved by the vendor management team. This allows for the original submittal to be captured and left unedited as the project moves through approval. This is useful because there are times when the review process may result in system design changes.
- They added the CS and NP/PF disclosures.

They would like to make the following additional improvements.

- Eliminate all forms with all data inputs built directly into the portal. Such a change would require much additional coding and would be expensive.
- Improve the user interface.

Based on feedback from the AVs, including specific information about challenges with and errors on the site, it appears that additional improvement is needed. One Elevate Energy staff member noted that during beta testing, he found that the system was onerous and tiring to use, even for a knowledgeable staff member who participated in development. He noted that it can take three hours to complete an application because there are so many questions and so much information that must be provided. He noted that it is important to add a feature that allows vendors to save parts of their application as they are completed, and to return to the application at a later time, because there are so many files and attachments that the project application requires. This is one of the comments that the AVs made and a very important update to implement.⁹⁴

As with the ILSFA website, Elevate has not made many of these important updates to the portal to make it more user-friendly and ease the project submission process. They should be doing extensive planning and development at this time to improve the initial project application stage, prevent similar issues with later stages of project application, and ensure a smoother AV application process going forward.

G. Grassroots Education

Elevate Energy is responsible for coordinating the distribution of funding for Grassroots Education by CBOs and overseeing the Grassroots Educators' work.

⁹⁴ Elevate reported that this was corrected prior to the start of the program year two application window.

GEs are required to report information on education events held, type of event, topics covered, and number of attendees. Elevate is considering having GEs follow up with attendees to assess their interest and determine if they would like to be on a list for AVs to reach out to. Elevate would like GEs to move a step toward customer acquisition.

Elevate also expects GEs to educate low-income community members about CS projects that they may be able to subscribe to, and Elevate is putting together a summary of approved projects that the GEs can use as reference.

Elevate worked with the IPA to develop a second RFP for GEs. The RFP was released in January 2020 and the second round of GEs are expected to begin work in June 2020.

This evaluation report provides detailed information about the Grassroots Education that has been conducted by the initial round of educators. While the evaluation research found that 119 events had been completed or planned and these events reached a total of more than 2,500 participants, no events were held in 79 of the 102 counties and there are very large regions in the western and southern parts of the state where no activities had been held. However, the counties where the events were held made up approximately 59 percent of ILSFA-eligible households. The next GE RFP should work to recruit and contract with organizations in these other parts of the state.⁹⁵

H. Vendor Administration and Support

Elevate Energy has responsibilities for administering and supporting the vendor registration and project submission process. They are responsible for assisting the AVs to meet the ILSFA Program requirements by acting as a liaison with job training organizations and informing AVs of energy efficiency, weatherization, lead abatement, and other program opportunities that could provide additional benefits to participants.

Elevate's vendor management team works directly with the vendors. This involves supporting vendors through the application and vetting process, reviewing vendor applications, and making recommendations to the IPA about whether they should approve each vendor. Once vendors are approved, Elevate performs the vendor onboarding process, provides them with vendor credentials to access the portal, trains them on how to access the system, helps them submit projects, and answers questions on their projects. Elevate assesses the needs of each AV and tailors specialized training to those needs.

Elevate has trainings set up as webinars, but can have vendors at their office or share screens remotely to provide additional support. The vendor team provides one-on-one training to walk vendors through the process of submitting projects. They have offered live trainings to both prospective vendors and AVs, and these have been recorded and are available online to users at any time.

⁹⁵ Elevate reported that they are working to reach as many areas of the state as they can with the current GE RFP. They have shared the RFP through their usual channels and have reached out to partner organizations to ask them to share the information. Elevate stated that the Illinois Association of Community Action Organizations and the Illinois Environmental Council shared the RFP with their memberships. Elevate is also sending press releases to central and southern Illinois news outlets.

The AV training covers Part I project application topics such as: how to create a project, entering the Part I form, recipient verification, and batch submittal. Topics included the following.

- Approved Vendor Registration
- Approved Vendor Portal Training
- Batch and Disclosures
- Job Training Requirements
- Submitting Projects and Batches
- Project Selection
- Income Verification

Elevate has plans to redo some of the training webinars into shorter presentations on specific topics, to allow the AVs to go directly to the topic they have questions about instead of needing to watch a full webinar. Elevate plans to deliver content in five-to-ten-minute training vignettes with appropriate labels and headings so vendors easily can find training segments to match their needs.

Grid Alternatives was subcontracted by Elevate Energy to perform the workforce program management part of the Solar for All Program. This work entails building relationships with the job training organizations, understanding their curriculum and student population, and helping them connect with AVs and other potential employers. It involves building the pipeline between the FEJA-funded job training organizations and the AVs. Elevate/Grid is also developing an inventory of the class offerings, eligibility, and requirements so they can better support the AVs. They will be working with the AVs on funded projects to ensure that they complete their job training affidavits correctly and verifying the information that is provided. The verification will include speaking with the job trainee and verifying information listed on the affidavit. They will review hours worked and roles taken on the projects.

If job training programs do not exist where the AVs are located, Elevate/Grid will work with the AVs to develop a solution. The majority of the job training organizations are in the Chicago area, but the International Brotherhood of Electrical Workers (IBEW) has coverage across the state. There's currently a project in Rockford where the project managers were hoping the local Rockford IBEW would provide job training to provide local job trainees to work on the Rockford project.

The IBEW training in Rockford had not been rolled out, so Elevate/Grid is working with the local carpenters' union in Rockford to help them become one of the "other qualifying programs". The carpenters' union has a solar skills course that many of their union members take to understand the solar installation and solar construction process. Elevate/Grid is hoping to certify them as an "other qualifying program", so that individuals who go through their program can be counted towards the AVs job training requirement hours.

Interviews with Elevate staff and AVs show that Elevate has provided extensive support to the AVs throughout the registration and project submission process. AVs spoke favorably about their experience with Elevate and the tremendous assistance that Elevate provided. The AV support is clearly an area where Elevate has excelled. Further improvement of the portal will reduce the need for assistance from many of the AVs. However, due to the fact that some of the AVs have limited experience with databases, some will continue to require such support.

I. Environmental Justice

Elevate was responsible for working with the IPA to develop the EJ determination process and the self-designation process. They developed a rigorous and well-documented process for determining the EJ communities, and the map and list of EJ communities is provided on the ILSFA website.

Elevate now continues to work with the IPA and community groups to score incoming EJ self-designation applications. They have also developed a systematic process for this scoring and meet with the scoring group on a regular basis to score EJ self-designation applications as they come in.

In the scoring process, Elevate found that a large number of the initial applications were coming from AVs, or solar developers. Elevate had initially thought that the self-designation applications would be coming from the Community Action Groups, but they could tell the solar vendors were driving the process based on how the applications were written. Instead of designating a community, the applications appeared to be trying to get qualification or points for a project. This is an issue that the scoring committee should continue to review moving forward.

J. Reporting

Elevate is responsible for providing quarterly reports to the IPA and the ICC on the status of the program, including number of applications received, number of applications approved, number of projects completed, REC payments, payments for grassroots education efforts, status of grassroots education, and technical assistance provided. Elevate has been working to develop these drafts and discussing the proposed reports with the IPA. The report format was recently finalized with the IPA and the ICC, and a draft is currently under review by the IPA.

Elevate has developed the following reports to update the IPA on the ILSFA progress and also met with the IPA on a regular basis to provide updates.

- **Call Center Metrics:** This report provides information on the number of calls by month, inbound versus outbound, type of caller, and topic. This report does a good job of presenting the important information about the call center.
- **Technical Assistance:** This separate report provides information on the date, organization, contact, and nature of the inquiry each month. This is a useful report to understand the types of questions received by Elevate Energy.

- **Newsletter Report:** This report provides information on the date of the report, the recipients, a summary of the information provided, a link to the report, the delivery and opening rate, the rate at which hyperlinks were clicked, and a table that provides statistics for all newsletters, and recommendations for future newsletters. This is a detailed and informative report that does a good job of presenting the information.
- **Website Report:** This report provides information on use of the ILSFA website, where users originate from (such as search, email, and referral), specific referral sources (such as Illinois.gov and elevateenergy.org), the pages within the ILSFA website that had the most views, and the email campaign that led to the website visit. This is a detailed and informative report that does a good job of presenting the information.

Elevate has done a good job of developing reports that provide important information to the IPA. However, they have not provided a report that summarizes the progress of the program. Prior to approval of the quarterly report format, Elevate should have delivered a periodic report to the IPA that summarized the program progress as required in the planned quarterly report. This would be useful information for the IPA to have in summary format, even if the eventual report format was to be revised by the IPA or the ICC.

K. Quality Assurance

Elevate is responsible for developing a process for quality assurance, including photos of projects under construction and on-site inspection of a random sample of installations. Projects have not yet reached the stage when quality control would be undertaken. However, Elevate has developed an Onsite Inspection Checklist. This document provides an overview of the inspection requirements and tables that record information on the systems, scoring and approval instructions, and an overall scoring rubric. The document provides separate instructions and scoring for various types of systems. The document also provides an AV rating and correction action that is required, if applicable.

The Onsite Inspection Checklist is a comprehensive form that will systematically collect important information on the quality of the installation and the AV's work.

VII. Findings and Recommendations

This section provides a summary of findings and recommendations from all of the research summarized in this report.

A. Key Findings

The key findings are summarized below.

- *Vendor Participation:* Vendor participation, if measured by the number of AVs, is sufficient to implement the program. However, more vendors will need to participate in the DG component as the program moves forward to ensure success of that program.
- *Vendor Diversity:* None of the selected projects were submitted by MWBEs, and there is a concern that there is a lack of vendor diversity.
- *Project Submission:* The project submission process is challenging and cumbersome. This prevents some AVs from submitting projects and others from submitting projects that are deemed eligible.
- *Participation:* The ILSFA Program has now been successful in accomplishing participation in all four sub-programs. However, the DG sub-program only had one maximum-sized project for a large multi-family building, and there is still concern about the feasibility of participation in the single-family DG program with individual participant-sized systems.
- *Project Size:* Four of the eight selected CS projects were larger than 1,000 AC kW. The DG project was 2,000 AC kW. There is a concern about the economies of scale for smaller projects.
- *Marginalized Communities and Diversity:* The program has reached EJ communities and LI communities. However, there are opportunities to ensure that there is more diversity in geography and urbanity, as well as participation by minority businesses.
- *Program Administrator Assessment:* Elevate developed the foundation for the ILSFA Program and has facilitated participation in all sub-programs. They have a dedicated and invested team of professionals that are committed to developing this important program. However, there are several areas where improvements are suggested.

Elevate's many accomplishments include the following.

- Call Center: The call center responded to calls and information requests from a diverse group of program actors.
- Materials and Guidelines: Numerous documents, created during a brief program development period, provide the key requirements and forms for the program.

- ILSFA Website: The ILSFA website provides a wealth of information on the program and serves as an important information source for stakeholders, GEs, vendors, and potential participants.
- Portal: The Salesforce-based system collects and manages information on AVs, projects, participants, and Grassroots Education.
- Grassroots Education: 11 GEs were contracted, and they conducted over 100 activities and reached over 2,500 individuals.
- AV Support: AVs received extensive support from Elevate in the registration and project submission process and view Elevate as a critical program resource.
- EJ Community Designation: The EJ determination uses a rigorous and well-documented process, and the self-designated EJ component has a systematic process for assessing and scoring self-designating EJ communities.
- Reporting: Comprehensive and well-organized reports provide information on call center metrics, technical assistance, newsletters, and use of the ILSFA website.
- Quality Assurance: An Onsite Inspection Checklist provides a comprehensive form to systematically collect important information on the installation quality and the AV performance.

There are some key areas for improvement.

- Outreach did not connect with key stakeholder groups. More proactive engagement with energy efficiency providers and job training organizations would be beneficial.
- Program materials are complex, and the AV manual does not provide a clear process for AV registration and project submission steps and requirements.
- The ILSFA website is not well-organized and information can be difficult to locate.
- The portal could be improved to be more user-friendly and informative, and to simplify the project submission process.
- Grassroots Education was not held in 77 percent of IL counties, and there are very large regions in the western and southern parts of the state where no Grassroots Education activities have been held.
- Reports on key program progress have not been delivered while awaiting approval for report content and formatting. While Elevate has delivered other reports, they had not delivered reports on some of the key performance metrics. The quarterly report format was recently approved by the IPA and the ICC and a draft is currently under review by the IPA.

B. Recommendations

Recommendations from the initial Phase II Evaluation are summarized below.

Design and Management

- *Program Management:* Elevate staff members focus on meeting implementation deadlines. There can be a lack of proactive planning, and there does not appear to be enough of a strategic management approach. Elevate should designate individuals who are focused on addressing identified barriers, more efficiently implementing Elevate-identified program improvements, planning the next stages of program implementation, and implementing several of the important improvements that were identified in the Phase I Evaluation and in this evaluation report. They may want to consider hiring external consultants to revamp the website and to improve the usability and features of the portal.
- *DG Requirements and Support:* Consider changes to DG requirements and increased support to DG vendors to develop participation in small DG projects.
 - *DG Vendors:* Reach out to AVs to assess what support is needed to develop participation in smaller DG projects.
 - *Batches:* Allow for smaller project size batches to be submitted so that as many as ten projects do not have to be included for a DG batch to be eligible.⁹⁶
 - *Site Suitability:* Assess whether coordination with energy efficiency or other programs can address mitigation requirements that have been identified.
- *DG Redesign:* If participation in small DG projects continues to fall well short of expectations, consider a complete redesign of this sub-program where an implementation contractor is hired to recruit participants and install PV systems in the homes of low-income households.⁹⁷ This could have the following advantages.
 - *Economies of Scale:* The financials are difficult for AVs developing small DG projects that each individually have more paperwork requirements than one large CS project. Having one contractor implement part or all of the DG sub-program could help to develop the economies of scale that are not present for vendors submitting small batches of projects.
 - *Participant Diversity:* This method would allow the program to design targeting and participation criteria that increase the diversity of participants.
 - *Coordination:* The program could direct and support the contractor to coordinate with energy efficiency programs.

⁹⁶ This is addressed in the Revised Long-Term Plan.

⁹⁷ This would require revisions to the Long-Term Plan.

- *Vendor Development*: The program could direct the contractor to work with a certain number of small and MWBE installation companies to help develop the market for low-income solar across the state of IL.
- *Minority Firm Support*: Support participation by MWBE vendors.
 - *Outreach*: Conduct additional outreach to the four AVs that are MWBEs. Assess why they have not submitted projects or why their projects have not been selected. Determine what additional support is needed.
 - *Partnerships*: Provide opportunities for the MWBEs to meet with AVs that have had selected projects to potentially facilitate a partnership process.
 - *Certification*: Determine if there are provisions available in state MWBE certification to remove barriers to the process for solar companies seeking such certification.
- *Project Selection*: Consider a revised project selection process to provide more diversity in vendors and projects.⁹⁸ This may include some of the following components.
 - *Vendor Diversity*: Award points for vendor diversity as is done with diversity of other project characteristics (project size, utility territory, etc.) to increase the number of different vendors that have selected projects. This will have a greater impact on the development of a low-income solar market in IL.
 - *Small Businesses*: Award points for small Illinois businesses to assist with the development of new solar vendors in the state.
 - *Minority Vendors*: Award points for vendors located in minority communities.
 - *Geographic Diversity*: Provide points for more granular geographic diversity than only the one division by utilities separated into two groups.
 - *Urbanity*: Provide points for projects in urban areas.
 - *Project Size*: Increase the scoring advantage for smaller projects, especially those in the CS sub-program.
 - *Utility Diversity*: Award points for projects in the territories of municipal utilities and rural electric cooperatives.

Program Implementation

- *Outreach*: Expand outreach to a more diverse group of stakeholders and work proactively to develop linkages with low-income communities, energy efficiency programs, and job training organizations.

⁹⁸ The Revised Long-Term Plan includes changes to the project selection process.

Community Action Agencies and other organizations that provide assistance with utility bills and weatherization are key resources for outreach and collaboration. Other organizations that are key targets include the following.

- State government offices, such as the Illinois Department of Commerce, which runs low-income energy assistance and weatherization programs.
 - City government offices (e.g. City of Champaign), targeting local employees who lead low-income energy assistance or housing programs for their cities.
 - State-level organizations with many community participants, such as Habitat Illinois, Illinois Association of Community Action Agencies, Housing Action Illinois, etc.
 - State-level organizations that serve targeted audiences, such as low-income individuals, people of color, people of faith, etc.
- *ILSFA Website:* The ILSFA website is the most common source of information for the ILSFA Program, and it is critical that this resource is improved for easier navigation and access to important information. This should be a priority for Elevate Energy going forward.
 - *Program Materials:* Simplify program materials and ensure that consumer-facing materials are at an appropriate reading level. Create a list of key steps and requirements for the vendor registration process and the project submission process.
 - *Grassroots Education:* Expand Grassroots Education to cover more of the state.
 - *Vendor Training:* Introduce an AV training session on interconnection in collaboration with the utilities.
 - *Vendor Portal:* Conduct extensive planning and development to improve the initial project application stage, prevent similar issues with later stages of project application, and ensure a smoother AV application process going forward.
 - *Income Verification:* Consider moving the income verification process from the AVs to Elevate or to a non-profit organization.