

ILLINOIS POWER AGENCY  
Low-Income Community Solar Pilot RFP

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**Stakeholder Request for Feedback**

The Illinois Power Agency's ("IPA" or "Agency") Revised Long-term Renewable Resources Procurement Plan provides for the procurement of RECs under 15-year contracts from projects selected under the Low-Income Community Solar Pilot sub-program.<sup>1</sup> This sub-program of the [Illinois Solar for All Program](#) is separate and distinct from the low-income community solar program.<sup>2</sup> Rather than applying to the Illinois Solar for All Program and receiving an administratively determined REC price (as is the case for the other Illinois Solar for All sub-programs including the low-income community solar program), projects selected through the Low-Income Community Solar Pilot receive a \$/REC price determined through a competitive bidding process. Projects must result in economic benefits for the members of the community in which they are located and must include a partnership with at least one community-based organization.

The IPA, through its Procurement Administrator NERA Economic Consulting, previously conducted a competitive procurement under the Low-Income Community Solar Pilot sub-program in 2019 with a budget of \$20 million. Documentation pertaining to that procurement is available on the procurement website (<https://www.ipa-energyrfp.com/2019-low-income-community-solar-pilot-procurement-ipa/>). A second procurement under the Low-Income Community Solar Pilot is planned to be held late this year with a budget of up to \$17.5 million.<sup>3</sup>

**To prepare for this procurement, the IPA and the Procurement Administrator seek stakeholder feedback on several topics**, including successful business arrangements that include community ownership by low-income subscribers, appropriate methods to define the community for a project, and how emergency measures in place due to COVID-19 have impacted outreach and engagement with the community and low-income subscriber recruitment.

Specific questions on which feedback is sought are found below. Commenters need not respond to every question (some may not be applicable) and commenters should not feel limited by these questions in providing feedback. Comments are welcome from both participants in the first competitive procurement under this sub-program as well as from other interested parties. **Responses are due by May 17, 2021 and should be sent to [Illinois-RFP@nera.com](mailto:Illinois-RFP@nera.com).**

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<sup>1</sup> See Sections 2.6.3 and 8.6.4 of the Revised Long-Term Renewable Resources Procurement Plan. This sub-program is pursuant to Section 1-56(b)(2)(D) of the Illinois Power Agency Act.

<sup>2</sup> Information for the low-income community solar program is available on the Illinois Solar for All website (<https://www.illinoissfa.com/>)

<sup>3</sup> The Agency understands that several proposals currently under consideration by the General Assembly would modify the budget available for the Low-Income Community Solar Pilot sub-program and thus result in this second procurement not being held. Should such legislative changes be enacted the Agency and Program Administrator will update stakeholders on the status of the procurement.

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In general, responses will be made public and published on the IPA's website ([https://www2.illinois.gov/sites/ipa/Pages/Renewable\\_Resources.aspx](https://www2.illinois.gov/sites/ipa/Pages/Renewable_Resources.aspx)). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions. Independent of that designation, if the IPA or its Procurement Administrator determines that a response contains confidential information that should not be disclosed in connection with a competitive procurement event, it reserves the right to provide its own redactions.

Some elements of the Low-Income Community Solar Pilot sub-program are prescribed by Public Act 99-0906, the Revised Long-term Renewable Resources Procurement Plan, or relevant Illinois Commerce Commission Orders and cannot be changed.

Please direct all questions to the Procurement Administrator at: [Illinois-RFP@nera.com](mailto:Illinois-RFP@nera.com)

## TOPIC 1: Project Ownership by Low-Income Subscribers

**The Low-Income Community Solar Pilot sub-program includes a requirement that a portion of the funds must be used for projects that are owned by low-income subscribers. The Procurement Administrator and the Agency are seeking feedback on successful business arrangements that would meet this requirement.**

1. Are you aware of successful business arrangements that have been deployed for community solar projects in Illinois or in another state that include community ownership by low-income subscribers? If so, please provide the following information if available:
  - a. Who are the parties in the arrangement? What percentage of the capacity of the project is owned by low-income subscribers? Are there limitations on the number of low-income subscribers and if so, what are those limitations?
  - b. What was the development timeline for the project that meets the community ownership requirement above and how does that timeline differ from a community solar project that does not include a community ownership aspect?
  - c. Was there a required upfront payment by the low-income subscribers? What are the benefits from ownership to the low-income subscribers? How long do the low-income subscribers receive these benefits?
  
2. In the 2019 competitive procurement held under the Low-Income Community Solar Pilot sub-program, a project could seek to qualify as a project owned by low-income subscribers. The requirements were:
  - a. The project was required to demonstrate that it was at least 50% owned by low-income subscribers. Is 50% an appropriate milestone?
  - b. The participant presenting such a project was required to provide the following documentation to substantiate ownership of the project by low-income subscribers:
    - i. the list of low-income subscribers within the community with project ownership;
    - ii. documents to substantiate ownership of the project for each low-income subscriber; and
    - iii. income-verification for each low-income subscriber.In regard to ii, what documentation could be provided to substantiate ownership of the project by low-income subscribers within the community?
  
3. What are the challenges that developers face when a project is owned by subscribers, and by low-income subscribers in particular?

## TOPIC 2: Defining the Community

**Projects must include a partnership with at least one community-based organization (“CBO”) and the community in which the Project is located must be identified.** In the 2019 competitive procurement held under the Low-Income Community Solar Pilot sub-program, **participants were required to geographically identify the community.** Participants had the option to geographically define the community either as: (i) the area and the group of residents to whom the CBO was providing programs and services; or (ii) an area smaller and entirely contained within the relevant geographical boundaries of the CBO’s operating boundaries. Furthermore, **participants were required to provide evidence that the community’s residents associate themselves with the community.** Such evidence could include copies of community newsletters or screenshots of social media posts by residents or organizations including local businesses, groups, and clubs located within the community that ties the name of the community to that resident or local organization (and therefore the residents). **The Procurement Administrator and the Agency are seeking feedback on these requirements related to defining the community in which the Project is located.**

4. Is using the operating boundaries of the CBO, or a subset within, a practical way to define the community for the project? What other methods for defining the community could be used?
5. Is there additional evidence that should be considered to show that the community’s residents associate themselves with the community?

## TOPIC 3: Effects of COVID-19 on Outreach

In the 2019 competitive procurement held under the Low-Income Community Solar Pilot sub-program, **participants were required to provide information regarding outreach and engagement efforts with the community and to provide information regarding activities to recruit subscribers.** Participants were required to describe their outreach and engagement efforts with the community and to provide specific information regarding at least two events, including the date of the event, the topics covered, and the number of individuals in attendance. Participants were also required to provide examples of marketing materials provided to potential subscribers, to describe the manner in which these subscribers would be recruited, and to describe the type of subscribers that was being recruited. **The Procurement Administrator and the Agency are seeking feedback on how emergency measures in place due to COVID-19 have impacted these efforts.**

6. Have developers changed their methods of outreach and engagement due to the emergency measures in place due to COVID-19? If yes, please provide examples

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of methods used to engage the community, and/or attract and recruit subscribers in the current environment.<sup>4</sup>

7. What information or documentation could be provided as evidence of outreach and engagement?

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<sup>4</sup> Please see the Agency's most recent update on COVID-19 related marketing guidelines:  
<https://www.illinoissfa.com/announcements/2021/04/updated-covid-19-related-marketing-guidelines-5/>.