



## **ENVIRONMENTAL LAW & POLICY CENTER**

**Protecting the Midwest's Environment and Natural Heritage**

October 19, 2018

**TO: Program Administrator - Adjustable Block Program and the Illinois Power Agency**

**FROM: MeLena Hessel, Policy Advocate, Environmental Law & Policy Center (ELPC);  
Brad Klein, ELPC; Will Kenworthy, Regulatory Director, Vote Solar**

**SUBJECT: Comments on Draft Approved Vendor Application and Standards**

The Environmental Law and Policy Center (ELPC) and Vote Solar appreciate the opportunity to provide comments to the Illinois Power Agency (IPA or Agency) and the Adjustable Block Program (APB) Administrator in response to the release of its draft Approved Vendor application and standards. ELPC has spent years advocating for the expansion of clean energy in Illinois, specifically to ensure the success of Illinois' Renewable Portfolio Standard. ELPC was a party in the proceeding to approve the Long-Term Renewable Resources Procurement Plan (Plan) and has engaged in extensive outreach, both with the renewables industry and environmental advocates. ELPC is also an active participant in the Illinois Solar for All Working Group. ELPC draws on this experience to inform our comments on the draft application and standards. Vote Solar is a non-profit, non-partisan, grassroots organization working to fight climate change and foster economic opportunity by bringing solar energy and other distributed energy resources ("DER") into the mainstream.

The Approved Vendor construct is a key piece of the consumer protection infrastructure for the Adjustable Block Program (and the Illinois Solar for All Program), as put forward by the IPA and approved by the Illinois Commerce Commission in the Long-Term Renewable Resources Procurement Plan (Plan). Strong consumer protection is vital to maintaining market confidence as the distributed and community solar markets scale up in Illinois. It also ensures a level playing field amongst distributed and community solar providers. At the same time those protections must be reasonable, to not hamper the market's ability to scale up as envisioned by the legislature when it passed P.A. 99-0906.

The Approved Vendor construct for the Adjustable Block Program will also be an important instrument for the IPA and its Administrators to use to coordinate between the Adjustable Block Program (ABP) and the job training programs.

35 East Wacker Drive, Suite 1600 • Chicago, Illinois 60601

(312) 673-6500 • [www.ELPC.org](http://www.ELPC.org)

David C. Wilhelm, Chairperson • Howard A. Learner, Executive Director

Columbus, OH • Des Moines, IA • Duluth, MN • Jamestown, ND • Madison, WI • Sioux Falls, SD • Washington, D.C.



While ABP Vendors are under no obligation to utilize trainees or hire employees out of the job training program, the Approved Plan explicitly calls for the IPA to “encourage the hiring of graduates of job training programs...to work on installations of projects supported by the Adjustable Block Program,” and the ABP Administrator to “provide information to Approved Vendors to support this goal,” (Plan at 6.9, p. 120). As such Approved Vendors should arguably be required to receive information on solar job training programs and, potentially contact from said programs.

The IPA and its Administrator should therefore make sure its final Approved Vendor Application and Standards

- (1) Provide the tools necessary to weed out bad actors and address any problems that arise.
- (2) Are not overly burdensome or cumbersome to hamper market growth at the start.
- (3) Work for all scales of potential Approved Vendors – from new, small companies that do not yet have a track record to long-established solar and distributed resource providers that are part of large, complex companies.

Sincerely,

MeLena Hessel  
Environmental Law & Policy Center  
35 E. Wacker Drive, Suite 1600  
Chicago, Illinois 60601  
(312)-795-3738  
[mhessel@elpc.org](mailto:mhessel@elpc.org)

Bradley Klein  
Environmental Law & Policy Center  
35 E. Wacker Drive, Suite 1600  
Chicago, Illinois 60601  
(312)-795-3746  
[bklein@elpc.org](mailto:bklein@elpc.org)

Will Kenworthy  
Vote Solar  
18 S. Michigan Avenue, Suite 1200  
Chicago, IL 60614  
(704)-241-4394  
[will@votesolar.org](mailto:will@votesolar.org)