

**Adjustable Block Program Request for Feedback**  
**Annual Report Job Training and Solar Workforce Diversity Reporting**

June 17, 2020

**Background**

The [Revised Long-Term Renewable Resources Procurement Plan](#) (“Revised Plan”) includes a provision to add a new component to the Approved Vendor Annual Report:<sup>1</sup>

*Other information related to ongoing program participation, including use of graduates of job training programs and other information related to increasing the diversity of the solar workforce.*

In ICC Docket No. 19-0995 approving the Revised Plan, the Illinois Power Agency (“IPA”) committed to seeking stakeholder feedback on how this information should be reported. As stated in that proceeding, this trainee and diversity information would be collected for informational purposes; the Agency will not consider failure of an Approved Vendor to hire trainees or diversify their workforce as criteria for continuation of the Approved Vendor’s status.<sup>2</sup>

The Program Administrator expects to open the Annual Report portal for Approved Vendors on June 22, 2020. The portal will *initially* not include spaces for entries related to hiring of graduates of job training programs and workforce diversity; instead, those will be added after the completion of this stakeholder feedback process. Approved Vendors will be required to submit Annual Reports to the Program Administrator by July 15, 2020. For many other components contained in the Annual Report, the Approved Vendor will only need to verify that the information in the portal is correct, and provide updated information where applicable. Additional time will be granted, as described below, for the submittal of information related to the use of graduates of job training programs and increasing the diversity of the solar workforce.

**Request for Feedback**

Below the IPA proposes what information Approved Vendors would provide and how this information would be collected in Annual Reports; comments are sought on this proposal. Please email your comments on this proposed approach to [admin@illinoisabp.com](mailto:admin@illinoisabp.com) with the subject line “Annual Report Training and Diversity Stakeholder Comments – [STAKEHOLDER NAME]” no

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<sup>1</sup> For the other requirements of the Approved Vendor Annual Report, see page 164 of the Revised Plan.

<sup>2</sup> IPA Response in ICC Docket No. 19-0995 at 65. The ICC accepted this approach in their Final Order approving the Revised Plan (See Docket No. 19-0995, Final Order dated February 18, 2020 at 87).

later than **Friday, June 26, 2020**. To the extent possible, if you propose alternative information to be collected, please include specific proposed changes as part of your comments.

Responses will be made public and published on the ABP's website (<http://illinoisabp.com/>). Should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions (entire submittals may not be designated confidential). Independent of that designation, if the Agency or the ABP Program Administrator determines that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions.

### **Proposed Information Reporting**

- A. Reporting of job training and workforce diversity information will be at the Approved Vendor level rather than reporting for each Adjustable Block Program project separately. Approved Vendors will be expected to report on the use of job training graduates and the Approved Vendor's workforce diversity in aggregate.
- B. For the Annual Report, information should be reported in two categories, Direct and Indirect.
  - a. Direct means hiring and employment by the Approved Vendor, e.g., staff on the Approved Vendor's payroll. For Approved Vendors that are LLCs without any employees, this hiring and employment information should be reported at the parent company level. Reporting should be limited to activities undertaken in relation to the marketing, sale, development, and operation of projects participating the Adjustable Block Program.
  - b. Indirect means hiring and employment conducted by the Approved Vendor's designees, installers, marketing/sales sub-contractors, etc. as it relates to the marketing, sale, development, and operation of projects participating in the Adjustable Block Program.
- C. Reporting on hiring of graduates of Job Training Programs should only include graduates working in Illinois. Likewise, workforce diversity reporting should only include Illinois-based workforce.
- D. For this first Annual Report, reporting will be based on all the Approved Vendor's activities related to the Adjustable Block Program through May 31, 2020. Future Annual Reports will cover activities correlated to energy delivery years (June 1 to May 31). To the extent divisible, work related to the Illinois Solar for All Program should not be included, as that will be reported on separately.

- E. The Future Energy Jobs Act (“FEJA”) created and provided funding for three specific job training program categories (Solar Training Pipeline Program, Craft Apprenticeship Program, and Multi-Cultural Jobs Programs).<sup>3</sup> Quantitative reporting concerning trainees hired will distinguish between graduates of each of these programs and graduates of other training programs.
- F. The Agency will publicly report aggregated data and other information from the Annual Reports that does not identify the specific Approved Vendor.
- G. The Annual Report is due on July 15, 2020. In recognition of the short time to consider these draft requirements, and the subsequent finalized version, Approved Vendors may use the 90-day period specified in the Revised Plan to update and/or cure any deficiencies in the Annual Report to submit this information. In other words, Approved Vendors should endeavor to submit job training and workforce diversity information by July 15, 2020 if they have the necessary information already collected and available, but may submit job training and workforce development information at a later date. The 90-day period ends October 13, 2020.

Each Approved Vendor will be asked to submit:

- 1. Narrative Information (to be submitted via document uploads)
  - a. A narrative description of the use of job training program graduates in connection with the Approved Vendor’s Adjustable Block Program projects during the reporting period.
    - i. Examples of information that could be provided would include, but is not limited to, efforts undertaken to recruit/hire trainees (including successes as well as challenges found), if trainees were hired on a temporary or permanent basis, a part-time or full-time basis, and retention rates.
    - ii. If graduates of training programs other than those in the three FEJA-categories were used, a description of those other training program(s).
    - iii. Approved Vendors should distinguish between information related to their Direct and Indirect activities based on the description in B. above.
  - b. A narrative description of the Approved Vendor’s efforts related to increasing the diversity of its solar workforce working on Adjustable Block Program projects during the reporting period.

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<sup>3</sup> For more information on job training programs, see: <https://www.illinoissfa.com/job-training/>.

- i. This description should distinguish between increasing diversity of the installation workforce and workforce in administrative, sales, marketing, and technical roles.
  - ii. Approved Vendors should describe the diversity of management and/or supervisory positions compared to their overall workforce working in connection with the Adjustable Block Program.
  - iii. Approved Vendors should distinguish between information related to their Direct and Indirect activities based on the description in B. above.
- 2. Quantitative Information
  - a. For reporting quantitative information, the Approved Vendor will submit information separately for Direct and Indirect work (as described in B. above).
  - b. Percentage of workforce should be calculated based only on workforce working on Adjustable Block Program projects. The Approved Vendor should specify how calculated (e.g., hours worked, Full-Time Equivalents (“FTE”), or another methodology as described by the Approved Vendor).
  - c. Approved Vendors should clearly differentiate between information that is not available (“N/A”) and where the response is that no one was hired (“0” or “None”). For information that is not available the Approved Vendors should provide an explanation in the narrative on why the information was not available.

### Sample Templates<sup>4</sup>

#### Job Training Hiring for Development of Adjustable Block Program Projects

	# Full-Time	# Part-Time	# Temporary <sup>5</sup>	# Hired (Total)	Average Wage (\$/Hour)
Solar Training Pipeline Program					
Craft Apprenticeship Program					
Multi-Cultural Jobs Programs					
Other Job Training Program					
_____ (add rows as needed)					

<sup>4</sup> Suggested edits and comments are also sought on these sample templates.

<sup>5</sup> Workers hired on a temporary basis should be included only in this category, and not as full-time or part-time in the preceding columns.

### Illinois-based Workforce Diversity

	FTE	% of workforce <sup>6</sup>
<b>Race</b>		
Black or African-American		
Hispanic or Latino		
Asian		
American Indian or Alaska Native		
Native Hawaiian or Other Pacific Islander		
<b>Gender Identity</b>		
Female		
Non-binary		
<b>Disabled</b>		
<b>Veteran</b>		
Workforce percentage calculation methodology		

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<sup>6</sup> The workforce denominator used to calculate this percentage should refer only to work done in Illinois in connection with the Adjustable Block Program (i.e., it should feature the same methodology as when reporting on the numerator).