



Program Reopening Updates

Monday December 13, 2021

11:00 AM – 1:00 PM CPT

Agenda

- **Introduction – Goals for today**
- **Climate and Equitable Jobs Act (CEJA) Background & Goals**
- **Main Program areas that are changing:**
 - **Prevailing wage**
 - **Capacity allocations for waitlisted Traditional Community Solar (TCS) applications**
 - **Equity Eligible Contractor (EEC) requirements**
 - **EEC registration**
 - **Part I application updates**
 - **Waitlisted distributed generation (DG) projects**
 - **Revised REC contracts**

- **Presenters**

- **Brian Granahan – IPA, Chief Legal Counsel**
- **Kelly Turner, IPA, Deputy Legal Counsel**
- **Sarah Duffy, IPA, Associate Legal Counsel**
- **Sharon Johnson, IPA, Diversity, Equity, and Inclusion Manager**
- **Audrey Steinbach – IPA, ABP Program Manager**
- **Kevin Quilliam – InClima (Program Administrator), CEO**
- **Alex Rein – InClima (Program Administrator), COO**

- **Goals**

- **Recap of CEJA**
- **Highlight changes to the ABP as a result of CEJA**
- **Questions – Submit via the Q&A feature**
 - They will be answered at the end of the presentation

How did we get here?

- **Various ingredients came together to provide the right formula for a bill**
 - **Need to support nuclear plants at risk of closure**
 - **Strong desire for more equitable outcomes from the clean energy economy**
 - **Need for additional funding (as well as changes to the budgeting approach used to support new renewable energy projects)**
 - **Ethics and ratemaking reform**
 - **Ensuring strong labor standards on new projects**
 - **Need to handle coal plant closure and communities in transition**

- **From RPS standpoint, we had both massive successes and serious challenges from FEJA**
 - **Incented the development of over 25,000 projects between all programs, competitive procurements, etc.**
 - Previously 80 MW of solar in Illinois
 - Now over 2000 MW of solar in Illinois
 - Over 670 MW of new distributed generation and community solar developed
 - Over 2300 MW of new utility scale wind and utility scale solar developed
 - **Still well behind the percentage-based targets of the RPS (only at around 8%, even with all of these new projects)**
 - **Funding largely exhausted, due to participation levels/contract payment structure/inability to roll over funds**
 - **Sense that weren't seeing the benefits of the clean energy economy spread equitably across our state**

Changes in ABP Scale

- **RPS budget**
 - From 2.015% of 2007 rates to 4.25% of 2009 rates with capacity
 - From ~230m to well over \$500m
- **REC delivery targets**
 - 45,000,000 RECs from new projects delivered annually by 2030
 - No longer 1m, 1.5m, 2m ABP targets
 - If 55% from solar, and 50% of solar from ABP, then 12.375m
 - But need to back our existing contracts and work
 - Even just 10,000,000 RECs delivered annually = 6,500+ MW
- **Long-Term Plan role**

Changes in ABP Structure

- **Shift from three to six categories (with size changes to some)**
- **New focuses**
 - **Specific project types**
 - **Equity block**
- **Different contract terms**
 - **No more either full up-front (Small DG) or 20% up-front and remaining 80% across next four years (Large DG and CS)**
- **No discretionary capacity**
 - **Uncontracted capacity is allocated to waitlist from other categories**
- **Annual block structure**

Updated Diversity and Equity Focus in ABP



- **Dedicated block for EEC applicants**
- **Workforce requirements after Long-Term Plan**
- **Data reporting**
- **Diversity report**
- **Disparity study**



Categories & Block Capacities

Program Categories

- **Small Distributed Generation (≤ 25 kW)**
- **Large Distributed Generation (> 25 kW and ≥ 5 MW)**
- **Traditional Community Solar (250 MW allocation for waitlisted CS projects only)**
- **Public Schools ***
 - Priority for projects on Tier 1/Tier 2 public schools or in EJ communities
- **Community-Driven Community Solar ***
 - Selection is points-based
- **Equity Eligible Contractor ***
 - Approved Vendor that meets specific criteria

*** New category established through CEJA**

Program Categories, continued

- If a project is eligible for more than one category, the Approved Vendor must select only one of the eligible categories into which to submit the application.
- Applications that were not in a REC contract at the time of the portal reopening on December 14, 2021, will fall under one of the 2021 REC Delivery Contracts, depending on the category into which those applications are submitted.
- [Link to REC Prices](#)

Block Capacities

Group	Small Distributed Generation (MW AC)	Large Distributed Generation (MW AC)	Traditional Community Solar (MW AC)	Community Driven Community Solar (MW AC)	Equity Eligible Contractor (MW AC)	Public Schools (MW AC)
A	37.43	42.90	75*	3	22.5	50
B	95.82	103.96	175	7	52.5	
Total	133.25	146.86	250**	10	75	50

* Please note in the December 13, 2021, presentation of this PowerPoint, this was listed as 85 MW AC, a mistake that has since been corrected to 75 MW AC.

** Please note in the December 13, 2021, presentation of this PowerPoint, this was listed as 260 MW AC, a mistake that has since been corrected to 250 MW AC.



Prevailing Wage

Prevailing Wage

- **Prevailing wage applies to all construction activities**
- **Prevailing Wage Act includes notice and reporting requirements**
 - **Renewable energy projects are now “public works” within PWA**
- **[Link to Prevailing wage rates by county](#)**
- **[Link to Illinois Department of Labor Prevailing Wage Contractor FAQ](#)**
- **[Link to Illinois Department of Labor Prevailing Wage General FAQ](#)**
- **Detailed questions about prevailing wage should be emailed to the Program Administrator.**

- **All projects are required to pay prevailing wage with the following exceptions:**
 - **Distributed Generation projects >10kW AC that were on a waitlist prior to the portal reopening on December 14, 2021**
 - **Distributed generation projects (Large or Small) that either:**
 - Serve a single-family or multi-family residential facility, or
 - Serve a house of worship and are not greater than 100 kW AC (aggregated with any co-located projects), or
 - Completed construction on or before September 15, 2021, the effective date of Public Act 102-0662.

Prevailing Wage

- **Part I of the project application will include a required certification that the applicant understands that prevailing wage requirements apply to that project if it does not qualify for an exception.**
- **During project construction, contractors must submit Certified Transcripts of Payroll to the Department of Labor.**
- **In Part II of the project application, the Approved Vendor will be required to certify to and document compliance with prevailing wage requirements, if applicable.**



Capacity Allocations for Waitlisted Traditional Community Solar (TCS)

Capacity Allocations for Waitlisted TCS

- **CEJA allocates 250 MW (30% or 75 MW to Group A, and 70% or 175 MW to Group B) of new capacity to Approved Vendors of waitlisted Community Solar applications proportional to their capacity of waitlisted applications**
- **Approved Vendor affiliations were considered as of the September 15, 2021 effective date of the legislation and confirmed with Approved Vendors in November 2021.**
- **A 500 kW minimum is applied to each Approved Vendor across both Groups in aggregate and on a pro rata basis if an Approved Vendor has capacity on the waitlist of both Groups.**

Capacity Allocations for Waitlisted TCS



- **Each Approved Vendor is subject to a 20% maximum of each Group's capacity**
- **Approved Vendors may select waitlisted applications up to their allocated capacity and are permitted to adjust the system size (up to and including 2 MW) and associated specifications**
- **Traditional Community Solar applications are not being accepted at this time. More information on when these applications will be accepted will be available once the approval of the Revised LTRRPP is complete in 2022**

Capacity Allocations for Waitlisted TCS



- **Allocations to Approved Vendors will be announced on December 14, 2021**
- **Approved Vendors will then have 90 additional days to offer a portfolio of projects back to the IPA, with a statutory deadline of March 14, 2022**
- **Waitlisted projects may be resized up to 2 MW in size, but must be sized at a level commensurate with that Approved Vendor's allocated capacity**
- **No Approved Vendor (or its affiliates) may have more than 20% of a Group's capacity (e.g., no more than 15 MW for Group A or 35 MW for Group B) in those project application portfolios submitted back to the Program Administrator on March 14, 2022**

Capacity Transfer for Waitlisted TCS

- **Approved Vendors may transfer some or all of their allocated capacity within a Group to other Approved Vendors**
- **Transfers must be completed and memorialized no later than February 28, 2022**
 - **Community Solar Waitlist Capacity Transfer Confirmation form**
- **Associated specifications that may be updated include number and size of panels and inverter, capacity factor, type (e.g., fixed or tracking), and layout**
- **A project must remain on the same parcel(s) as noted in the original Part I application**



Equity Eligible Contractor (EEC) Requirements

EEC Requirements

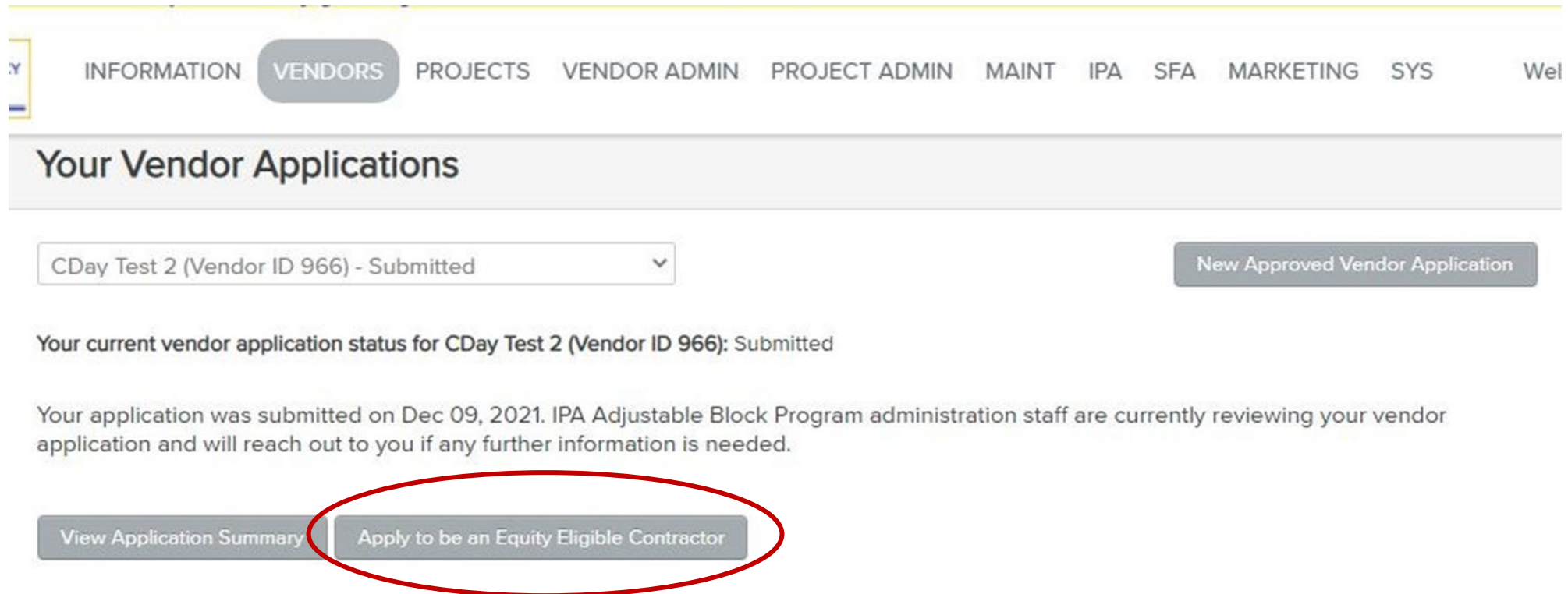
- **A majority of the owners (by % owned) or a majority of a non-profit's governing board must be EEC-eligible individuals**
- **Each qualifying person that meets one of the following criteria must complete an attestation:**
 - A. persons who graduated from an approved job training program**
 - B. persons who are graduates of or currently enrolled in the foster care system**
 - C. persons who were formerly incarcerated**
 - D. persons whose primary residence is in an equity investment eligible community**



Equity Eligible Contractor Registration

EEC Registration

- **EEC application is available at any time after submission of the Approved Vendor application.**



The screenshot shows the 'VENDORS' section of the IPA website. The navigation menu includes INFORMATION, VENDORS (highlighted), PROJECTS, VENDOR ADMIN, PROJECT ADMIN, MAINT, IPA, SFA, MARKETING, and SYS. The main heading is 'Your Vendor Applications'. Below this, there is a dropdown menu showing 'CDay Test 2 (Vendor ID 966) - Submitted' and a button for 'New Approved Vendor Application'. A status message reads: 'Your current vendor application status for CDay Test 2 (Vendor ID 966): Submitted'. Below that, a paragraph states: 'Your application was submitted on Dec 09, 2021. IPA Adjustable Block Program administration staff are currently reviewing your vendor application and will reach out to you if any further information is needed.' At the bottom, there are two buttons: 'View Application Summary' and 'Apply to be an Equity Eligible Contractor', with the latter button circled in red.

EEC Registration

- If the Approved Vendor's entity type is Corporation, General Partnership, LLP, LLC, or LP, the applicant will be asked to designate which owners, partners, or proprietors meet the EEC eligibility criteria.

Equity Eligible Contractor Application

Your EEC Application for CDay Test 2 (Vendor ID 966)

Please designate which Owners, Partners or Proprietors meet the EEC eligibility criteria

Select number of people to enter **REQUIRED**

EEC Registration

- If the Approved Vendor's entity type is non-profit, the applicant will be asked to provide the board membership of the non-profit and designate which board members meet the EEC eligibility criteria.

Please provide the total number of Board Members of the non-profit and each of their names **REQUIRED**

Please designate which Board Members meet the EEC eligibility criteria

Select number of people to enter **REQUIRED**

EEC Registration

- For each person entered, the applicant will be prompted to select from the following categories for which they seek EEC certification

Name of 1st Person **REQUIRED**

Select one or more of the following categories under which you seek Equity Eligible Contractor Certification **REQUIRED**

- i. persons who graduated from or are current or former participants in the Clean Jobs Workforce Network Program, the Clean Energy Contractor Incubator Program, the Illinois Climate Works Preapprenticeship Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multi-cultural jobs program created in paragraphs (a)(1) and (a)(3) of Section 16-108.21 of the Public Utilities Act;
- ii. persons who are graduates of or currently enrolled in the foster care system;
- iii. persons who were formerly incarcerated;
- iv. persons whose primary residence is in an equity investment eligible community

Submit EEC Part 1

EEC Registration

- Persons selecting option 'a' or 'd' will be requested to upload proof of status.
- All applicants are required to attest to their answer.

Equity Eligible Contractor Application

Your EEC Application for CDay Test 2 (Vendor ID 966)

[Return to Part 1](#)

[Download Attestation](#)

Required Uploads for A Name

EEC Upload Proof of Clean Job Workforce Network or similar status **REQUIRED**

[Choose File](#) No file chosen

EEC Upload ABP Attestation for EEC Eligible Persons **REQUIRED**

[Choose File](#) No file chosen

Required Uploads for D Name

EEC Upload Proof of Primary Residence in Equity Investment Eligible Community **REQUIRED**

[Choose File](#) No file chosen

EEC Upload ABP Attestation for EEC Eligible Persons **REQUIRED**

[Choose File](#) No file chosen

EEC Registration

Do you wish to be identified as an Equity Eligible Contractor in the list of Approved Vendors on the illinoisabp.com and illinoisshines.com web sites **REQUIRED**

-- Specify One --

Do you consider any information you provided confidential? **REQUIRED**

-- Specify One --

By checking this box, I acknowledge that I will be listed as an EEC on public project application reports and potential other public reports.

By checking this box, I acknowledge that the Administrator may follow up with additional questions to clarify EEC eligibility.

EEC Registration



- **EEC application is submitted and will be reviewed by the Program Administrator.**

Your Vendor Applications

CDay Test 2 (Vendor ID 966) - Submitted ▼

New Approved Vendor Application

Your current vendor application status for CDay Test 2 (Vendor ID 966): Submitted

Your application was submitted on Dec 09, 2021. IPA Adjustable Block Program administration staff are currently reviewing your vendor application and will reach out to you if any further information is needed.

View Application Summary

Your Application to become an Equity Eligible Contractor has been Submitted.



Part I Application Updates

Prevailing Wage

Application Updates – Prevailing Wage

- **House of Worship customer type has been added.**

Project Details

Customer Type **REQUIRED**

-- Specify One --

-- Specify One --

Residential

Non-Residential

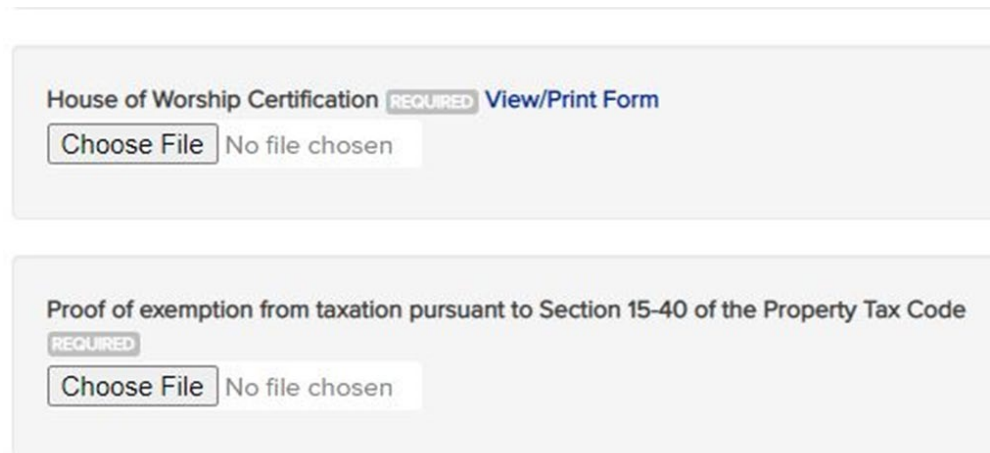
Government

Non-Profit

House of Worship

Application Updates – Prevailing Wage

- If project type "House of Worship" is selected and the project is ≤ 100 kW AC, the applicant will be asked to provide both of the following to qualify for an exception from prevailing wage requirements:
 - An attestation signed by the house of worship property owner or authorized board representative.
 - Proof of exemption from taxation pursuant to Section 15-40 of the Property Tax Code.



House of Worship Certification **REQUIRED** [View/Print Form](#)

No file chosen

Proof of exemption from taxation pursuant to Section 15-40 of the Property Tax Code

REQUIRED

No file chosen

Application Updates – Prevailing Wage

- If project type Residential is selected and the project is ≤ 25 kW AC, the Approved Vendor will be asked to attest via checkbox that the project is residential to qualify for an exception from prevailing wage requirements.

- By checking this box, I attest that this project is a residential project. A project can be considered residential if it meets one of the following criteria:
- Electric bill shows a residential classification; or
 - Property tax class code is residential; or
 - At least 75% of the usage of the structure(s) is residential

Application Updates – Prevailing Wage



- **The Approved Vendor must provide at least one form of documentation for proof of residential qualification.**

Proof of Residential Project

Please provide at least one of the following documents:

- Electric bill which shows residential classification; or
- Proof of residential property tax class code; or
- Provide documentation that at least 75% of the usage of the structure(s) is residential.

Please use Optional Upload slots if uploading more than one document as Proof of Residential Project.

Proof of Residential Project **REQUIRED**

Choose File No file chosen

Application Updates – Prevailing Wage



- **Projects that do not meet one of the previous prevailing wage exemptions will be asked if construction was completed on or before September 15, 2021.**

Was your project completed on or before September 15th, 2021 **REQUIRED**

-- Specify One --

- **If Yes, documentation is required:**

Proof of interconnection approval signed by the interconnecting utility on or before Sep 15, 2021, or other proof that construction was completed on or before Sep 15, 2021 **REQUIRED**

Choose File No file chosen

Application Updates – Prevailing Wage



- **Approved Vendors that answer “No” to all previous questions or don’t provide the required documentation must certify that they have read and understand this notice that the project is subject to prevailing wage requirements.**

Each project participating in the adjustable block program and not subject to limited exceptions outlined in P.A. 102-0662 shall comply with the prevailing wage requirements included in the Prevailing Wage Act (820 ILCS 130/1, et seq.). This requirement applies to the wages of laborers, mechanics, and other workers employed in construction activities for any project participating in the adjustable block program, as herein defined. This work includes, not only construction, but also, any maintenance, repair, assembly, or disassembly work performed on equipment whether owned, leased, or rented by the applicant or seller of RECs. The Approved Vendor shall ensure that any contractor or subcontractor performing work at the project facility has express notice of this requirement. The Approved Vendor shall require documentation and verification that all construction work performed at, in, or around the facility by the renewable energy credit delivery contract holder, its contractors, or its subcontractors relating to construction, maintenance, repair, assembly, or disassembly work is performed by employees receiving an amount equal to or greater than the general prevailing wage rate, as defined in Section 3 of the Prevailing Wage Act. Such documentation and verification includes, but is not limited to, the certified transcripts of payroll required to be filed with the Illinois Department of Labor. Additionally, the Approved Vendor shall ensure that notice of the local prevailing wage rates is posted at the work site or provided to workers in writing and that all contracts and subcontracts contain notice of application of the Prevailing Wage Act.

By checking this box, I certify that I have read and understand the above notice regarding wages paid for the construction of the project.



Part I Application Updates

Community Driven Community Solar

Application Updates – CDCS

Is this a Community Driven Community Solar project? **REQUIRED**

– Specify One –

- **If the project application is Traditional Community Solar, the project application will not be able proceed. Traditional Community solar applications are being accepted at this time. More information on when these applications will be accepted will be available once the Revised LTRRPP is complete.**

Application Updates – CDCS

- **Community Driven Community Solar applications are scored on a points-based system rather than taken on a first-come, first served basis.**
- **If the project application is for Community Driven Community Solar, the Approved Vendor will be asked several questions about the project.**

Is this a Community Driven Community Solar project? **REQUIRED**

yes ▼

In what county is the project located? **REQUIRED**

-- Specify One -- ▼

Was this project developed in response to a site-specific bidding process issued by a municipality or community group? **REQUIRED**

-- Specify One -- ▼

Application Updates – CDCS

- **Documentation is required if the project was developed in response to a site-specific bidding process issued by a municipality or community group.**

Was this project developed in response to a site-specific bidding process issued by a municipality or community group? **REQUIRED**

Yes, by a municipality ▼



Documentation of Bidding Process **REQUIRED**

Choose File No file chosen

Was this project developed in response to a site-specific bidding process issued by a municipality or community group? **REQUIRED**

Yes, by a community group ▼



Documentation of Bidding Process **REQUIRED**

Choose File No file chosen

Documentation of Community Based Organization **REQUIRED**

Choose File No file chosen

Application Updates – CDCS

- If the population of the county in which the project is located is <50,000:

Does the project commit to only serve subscribers in the same county or adjacent counties in which the project is located? **REQUIRED**

-- Specify One --

- If the population of the county in which the project is located is $\geq 50,000$:

Does the project commit to only serve subscribers in the same county in which the project is located? **REQUIRED**

-- Specify One --



Part I Application Updates

Public Schools

Application Updates – Public Schools

- To qualify for the Public Schools category, the Approved Vendor will be asked questions about the school:

Is the project located at a public school? **REQUIRED**

yes

Is this a Tier 1 or Tier 2 school based on the latest annual Evidence-Based Funding Distribution process? **REQUIRED**

-- Specify One --

If the school is Tier 1 or 2:

Is this a Tier 1 or Tier 2 school based on the latest annual Evidence-Based Funding Distribution process? **REQUIRED**

yes

District ID **REQUIRED**

District Name **REQUIRED**

If the school is not Tier 1 or 2:

Is this a Tier 1 or Tier 2 school based on the latest annual Evidence-Based Funding Distribution process? **REQUIRED**

no

Is the school is located in an Illinois Environmental Justice Community per the criteria contained in Section 8.15 of the Revised Long-Term Renewable Resources Procurement Plan and as shown on the map published on the Illinois Solar for All website. **REQUIRED**

-- Specify One --



Waitlisted DG Applications

Waitlisted DG Applications

- **Currently waitlisted projects are subject to the following:**
 - **New REC Pricing**
 - **Projects >10 kw and >= 25 kW are reclassified as Small DG**
 - **Prevailing Wage Requirements (and exceptions)**
- **Approved Vendors of waitlisted DG projects were notified of these changes by email on November 23, 2021.**
- **This notice included a deadline of Thursday, December 9, 2021, to acknowledge the new pricing and prevailing wage requirements or note any exceptions.**



Revised REC Contracts

Revised REC Contracts

- **Two new versions of the revised REC contract**
 - An Approved Vendor now may have as many as three REC contracts with a given utility.
- **Payment Cycles**
 - *2021 15-Year REC Delivery Contract* features three quarterly payment cycles designated upon Energization/Part II verification
 - *2021 20-Year REC Delivery Contract* is pay-as-deliver
- **Collateral Requirements**
 - Posted collateral (cash or LoC) is required. Collateral withholding is no longer an option.
- **CS Small Subscribers**
 - All CS projects now must meet $\geq 50\%$ small subscribers.
 - Small subscriber adders are removed.

Revised REC Contracts



Contract	Delivery Term	Category	Payment Structure
2019 REC Delivery Contract	15 years	Small DG	100% upfront payment at Energization
		Large DG on waitlist	20% upfront payment and remainder ratably over 4 years
		Traditional CS	
2021 15-Year REC Delivery Contract	15 years	Small DG	100% upfront payment at Energization
		Large DG on waitlist	20% upfront payment and remainder ratably over 4 years
		Large DG not on waitlist	
		CDCS	
2021 20-Year REC Delivery Contract	20 years	Traditional CS	Pay-as-deliver - If CS (Traditional or on Public Schools) adjust biannually based on subscription info in biannual report - If DG on Public Schools, no biannual adjustment
		DG or CS on Public Schools	

Long-Term Plan Update Process



Event	Date
P.A. 102-0662/CEJA signed	9/15/2021
Publication of 2022 Draft Plan	1/13/2022
Deadline for Comments on Draft Plan	2/28/2022
IPA Revision to Draft Plan Filing Deadline	3/21/2022
Objections to Filed Plan Due	4/4/2022
Tentative Expected Plan Approval	July 2022

Current questions can be submitted via the Q&A feature.

Future questions may be submitted to the Program Administrator:

admin@illinoisabp.com

(877) 783-1820



Thank You!