



Illinois Power Agency

Equity Accountability System Assessment (Part 1)

Prepared in accordance with Section 1-75(c-15)(2)(A) of the Illinois Power Agency Act (20 ILCS 3855)

August 16, 2024





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Letter from the Director

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In September 2021, through the Climate & Equitable Jobs Act (P.A. 102-0662), the IPA was handed a host of new responsibilities. Some of these responsibilities had familiar corollaries, such as taking existing solar incentive programs and building them up to 2-3 times the scale. Other responsibilities were entirely new to us, such as ensuring that equity principles were placed at the forefront of the growing clean energy economy.

The umbrella term for the IPA's CEJA-related equity responsibilities is the Equity Accountability System ("EAS"). It encompasses the following:

- A Minimum Equity Standard ("MES") applicable to the project workforce of companies participating in select IPA programs and procurements;
- A dedicated category within Illinois Shines for solar projects submitted by Equity Eligible Contactors ("EECs");
- The availability of an advance of capital predating project development within the EEC category;
- Bid selection preferences for utility-scale solar and wind projects committed to using a higher percentage of EECs or Equity Eligible Persons ("EEPs") in project construction; and
- An online Energy Workforce Equity Portal used to link clean energy companies to EEPs.

For the IPA, we have not only worked to faithfully implement each of these items; we have also sought to make a more holistic pivot in our priorities, placing equity at the forefront. This pivot included establishing a new Agency bureau devoted to Diversity, Equity, & Inclusion in 2023. That DEI Bureau is headed up by IPA Chief DEI Officer Tanvi Shah, the primary author of this EAS Assessment. As the Agency has worked to build out its new DEI Bureau, IPA Deputy Legal Counsel Sarah Duffy and Program Associate Emily Asbury have provided critical support in building out EAS implementation work. The IPA also committed to new waves of outreach and engagement, recognizing that equity objectives could never be reached without creating more pull into our programs. To that end, we have viewed our Energy Workforce Equity Portal as a hub providing pertinent information for broader clean energy economy engagement, and we work diligently to add new features to the Portal on a regular basis.

While IPA staff shoulders much of the policy development, Portal build-out, and EEP registration-related work, our Illinois Shines Program Administrator, Energy Solutions, has proven to be an invaluable resource for EAS implementation. As the first point of contact for Illinois Shines program participants, Energy Solutions reviews EEC applications and project submissions, and administers a mentorship program assisting small and emerging businesses with navigating program processes. Energy Solutions also handles a substantial portion of program-related outreach, helping create new



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touchpoints for the individuals and companies in need of assistance. Given the novelty, scale, and complexity of EAS implementation, this work would be impossible without a committed partner as our Illinois Shines Program Administrator, and Energy Solutions has proven to be that partner. We thank them for their work.

Turning back to the Assessment itself: because the first-year MES compliance reports are still being reviewed, this Assessment is being released in two parts. Part I examines the overall implementation of the Equity Accountability System based on data collected through the Agency's programs and procurements, stakeholder interviews, surveys, and other feedback. Part II, scheduled to be released in late 2024, will provide more robust analysis of MES compliance, including compliance rates, waiver rates, and related observations.

As outlined across the pages that follow, implementation of these new responsibilities has featured successes, failures, breakthroughs, and barriers. Through this EAS Assessment, we hope to provide an objective assessment of Equity Accountability System implementation. As we look to reorient the IPA's work based on these observations, we hope that lessons learned also help guide other policymakers in the years ahead.

Thank you for your interest in Part I of the IPA's Equity Accountability System Assessment and we truly hope this content serves you well.

Sincerely,

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1 Introduction

Established in 2007 by Public Act 95-0481, the Illinois Power Agency (IPA or Agency) is responsible for developing electricity procurement plans that ensure that Illinois residents have access to adequate, reliable, affordable, efficient, and environmentally sustainable electric service. The Agency is also responsible for the implementation of the Illinois Renewable Portfolio Standard (RPS), a state policy designed to drive the development of new renewable energy generation. The Agency administers incentive programs and procurements to promote renewable and zero-carbon energy generation, while building an equitable clean energy future for all Illinoisans. These initiatives are guided by the Illinois Power Agency Act (IPA Act or the Act),¹ as amended by Public Act 102-0662, which lays the foundation and framework for the state's renewable energy initiatives, focusing on enhancing equity within the clean energy sector.

The IPA also plays a pivotal role in the state's transition to an equitable energy future. Under the Equity Accountability System outlined in Section 1-75 of the IPA Act, the IPA is tasked with implementing a series of initiatives to ensure that equity principles are reflected across the clean energy economy in Illinois. As required under Section 1-75(c-15)(2)(A) of the Act, this Equity Accountability System Assessment analyzes the efficacy of those equity initiatives.

1.1 The Illinois Power Agency Act and its Equity Objectives

The IPA Act has been instrumental in shaping the renewable energy landscape in Illinois. It mandates the creation and expansion of solar incentive programs that promote renewable energy while ensuring that the benefits of these programs are distributed equitably. Specifically, the IPA Act establishes the objective of providing “priority access to the clean energy economy for businesses and workers from communities that have been excluded from economic opportunities in the energy sector, have been subject to disproportionate levels of pollution, and have disproportionately experienced negative public health outcomes.”² To advance that objective, the Act directs the Agency to establish an Equity Accountability System (EAS) to ensure that underserved and disadvantaged communities have access to the opportunities created by the clean energy economy. The Act further establishes several data collection and reporting requirements, including an EAS Assessment, to improve transparency regarding who participates in and benefits from the clean energy economy.

The EAS Assessment is a critical component of the Agency's efforts to promote equity. This assessment is mandated by Section 1-75(c-15) of the IPA Act, which requires the Agency to evaluate the effectiveness of the EAS in increasing the participation of historically marginalized communities in Illinois' clean energy economy. The assessment involves a comprehensive analysis of data collected through the Agency's programs and procurements, stakeholder interviews and feedback, community outreach, and other methods. The assessment aims to measure the impact of the EAS and to identify areas for improvement to ensure the system meets its equity goals.

¹ 20 ILCS 3855.

² 20 ILCS 3855/1-75(c-10).

The IPA administers incentive programs and procurements designed to increase the adoption of renewable energy across Illinois; select initiatives and efforts to introduce equity principles into their operation are outlined further below.

1.1.1 Illinois Shines (Adjustable Block Program)

The Illinois Shines program, statutorily known as the Adjustable Block Program, is a state-administered solar incentive program created to facilitate and encourage solar installations across Illinois and help the state meet its renewable energy goals. First established pursuant to Public Act 99-0906, colloquially known as the Future Energy Jobs Act (FEJA), the Program aims to support the development of solar energy in Illinois by offering financial incentives for solar installations across the state. The Program targets both distributed generation and community solar projects, making solar energy accessible and affordable for a broad spectrum of residents.

Distributed generation projects involve photovoltaic solar panels installed directly on homes, businesses, schools, or other structures to serve the electrical needs of those specific locations. This model promotes localized energy production and consumption, reducing reliance on external power sources and enhancing energy security. On the other hand, community solar projects are large, centralized solar installations that provide electricity to subscribers who may not have the means or suitable locations to install solar panels themselves. This approach democratizes access to renewable energy, allowing renters and homeowners without suitable conditions for solar installations to take advantage of solar energy production.

1.1.2 Competitive Procurements

In addition to Illinois Shines, the Agency conducts competitive procurements to procure Renewable Energy Credits³ (RECs) from large-scale renewable energy projects. These competitive procurements support the development of new utility-scale wind, solar, and brownfield site solar projects that will further the state efforts to meet its renewable energy goals and targets.

Through these procurement events, the Agency solicits bids from renewable energy project developers and evaluates eligible bids by price, with certain adjustments made for projects committed to equity provisions outlined in the EAS. By incorporating equity considerations into the procurement process, the Agency ensures that the benefits of renewable energy development are equitably distributed.

³ Renewable Energy Credits (RECs) are certificates that represent the environmental benefits of electricity generated from renewable energy generation.

1.1.3 Climate and Equitable Jobs Act and its Impact on IPA Program and Procurements

The enactment of Public Act 102-0662, also known as the Climate and Equitable Jobs Act (CEJA), in September 2021 significantly impacted the Agency's Illinois Shines program and its competitive procurement processes. This legislation introduced substantial changes aimed at expanding renewable energy adoption and promoting equity in the clean energy sector.

One of the key impacts was the increase in renewable energy procurement targets, which now mandate a more aggressive timeline for achieving the state's renewable energy goals. To facilitate this renewable energy development, CEJA expanded the Illinois RPS and strengthened the diversity, equity, and labor standards applicable to the growing clean energy economy.

Specifically, CEJA created the EAS mandating new equity requirements and goals for IPA-administered renewable energy programs and procurements. The Illinois Shines program was expanded to include three new project categories: Public Schools projects, Community-Driven Community Solar (CDCS) projects, and Equity Eligible Contractors (EEC). CEJA also mandated that the Program implement prevailing wage⁴ requirements and enhance consumer protection measures to ensure fair labor practices and safeguard consumers from unfair business practices.

The Agency-administered competitive procurement processes were also refined to align with these new priorities. CEJA directed the Agency to conduct procurements of RECs from new utility-scale wind and solar projects that not only focus on cost-effectiveness but also incorporate equity considerations into the evaluation and selection criteria for procurement bids.

CEJA has profoundly reshaped the Illinois Shines program and the Agency's renewable energy procurement processes, placing a strong emphasis on accelerated renewable energy adoption, equitable access, and inclusive economic growth within the clean energy sector.

1.2 Equity Goals

The IPA Act aims to rectify historical inequities by prioritizing access to the clean energy economy for historically excluded communities. These communities, often bearing the brunt of environmental pollution and related public health issues, are targeted to receive benefits from the growing renewable energy sector. The IPA Act outlines the development of an EAS, a comprehensive framework designed to promote equity, which includes the following mechanisms to achieve this goal:

- **Minimum Equity Standard:** The IPA Act mandates incremental increases in the participation of equity eligible persons and contractors in renewable energy projects. The Minimum Equity Standard (MES) went into effect on June 1, 2023, and requires that 10% of the work on renewable energy projects supported through certain IPA programs and

⁴ Prevailing wage is a minimum compensation level set by the Illinois Department of Labor by county for construction activities related to public works.

procurements be performed by Equity Eligible Persons (EEPs)⁵ or Equity Eligible Contractors (EECs)⁶. This target will increase to 30% by 2030 to ensure that a significant portion of the workforce in the clean energy sector comes from underrepresented groups.

- **Equity Eligible Contractor Category of the Illinois Shines Program:** This specific project category is reserved for Equity Eligible Contractors as direct applicants into the Program, providing them with dedicated opportunities within the Illinois Shines program.
- **Advance of Capital for Equity Eligible Contractors:** Recognizing the financial barriers faced by EECs, this initiative ensures that contractors demonstrating need have access to the necessary funds to participate in renewable energy projects, thereby reducing upfront financial constraints and enabling a more level playing field for newer/smaller entities.
- **Equity Bid Adjustments in Competitive Procurements:** The IPA develops bid evaluation requirements that favor bids involving Equity Eligible Contractors, ensuring that large-scale projects also contribute to the state's equity goals.

Each component is discussed in further detail in Section 1.4 below.

1.3 Legislative Intent

The equity provisions in the IPA Act reflect a clear legislative intent to bridge the gap between Illinois' renewable energy ambitions and the socio-economic upliftment of its marginalized populations. Through the enactment of Public Act 102-0662, lawmakers recognized that without targeted interventions, the benefits of the clean energy transition might bypass those who have historically been excluded from such economic opportunities. The Act's EAS is designed to ensure that renewable energy projects contribute to broader social and economic justice goals, fostering an inclusive clean energy economy.

By integrating these equity considerations into its programs and procurements, the Agency not only advances Illinois' clean energy targets but also ensures that the transition to renewable energy is equitable, inclusive, and just. This commitment to equity is not merely a statutory obligation but a strategic priority that aims to transform the energy landscape of Illinois in a way that benefits all its residents.

1.4 Components of the Equity Accountability System

⁵ Equity Eligible Persons mean "persons who would most benefit from equitable investments by the State designed to combat discrimination, specifically: (1) persons who graduate 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 [by the Future Energy Jobs Act]; (2) persons who are graduates of or currently enrolled in the foster care system; (3) persons who were formerly incarcerated; (4) persons whose primary residence is in an equity investment eligible community." 20 ILCS 3855/1-10.

⁶ Equity Eligible Contractor means a business that is majority-owned by Equity Eligible Persons, or a nonprofit or cooperative that is majority-governed by Equity Eligible Persons or is a natural person that is an Equity Eligible Persons offering personal services as an independent contractor as defined in Section 1-10 of the IPA Act. 20 ILCS 3855/1-10.

To advance the objectives set forth in the IPA Act of providing access to the clean energy economy for business and workers from communities that have historically been excluded from economic opportunities in the energy sector, been subject to disproportionate levels of pollution, and disproportionately experienced negative public health outcomes, the Agency has established the Equity Accountability System, which includes:

1. A Minimum Equity Standard applicable to the Illinois Shines Program and competitive procurements of Indexed RECs from utility-scale projects
2. The establishment of the EEC category in Illinois Shines, which provides the opportunities for an Advance of Capital to businesses owned by EEPs
3. Equity bid adjustments for competitive procurement processes that advance the equity goals of the Act

The Act further establishes several data collection and reporting requirements to support the assessment of the EAS and improve transparency regarding who participates in and benefits from the clean energy economy.

1.4.1 Definitions

Equity Eligible Persons Definition

The Illinois Power Agency Act defines Equity Eligible Persons⁷ as “persons who would most benefit from equitable investments by the State designed to combat discrimination, specifically:

- (1) persons who graduate from or are current or former participants in the Clean Jobs Workforce Network Program, the Clean Energy Contractor Incubator Program, the Illinois Climate Works Pre-apprenticeship 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;
- (2) persons who are graduates of or currently enrolled in the foster care system;
- (3) persons who were formerly incarcerated;
- (4) persons whose primary residence is in an equity investment eligible community.”

Equity Investment Eligible Communities Definition

Equity Investment Eligible Communities⁸ (EIECs) are geographic areas throughout Illinois which would most benefit from equitable investments by the State designed to combat discrimination. The eligible communities are:

⁷ 20 ILCS 3855/1-10.

⁸ 20 ILCS 3855/1-10.

- (1) R3 Areas as established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector; and
- (2) Environmental justice communities, as defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.

Equity Eligible Contractor Definition

The IPA Act defines an Equity Eligible Contractor as “a business that is majority-owned by eligible persons, or a nonprofit or cooperative that is majority-governed by eligible persons or is a natural person that is an eligible person offering personal services as an independent contractor.”

Project Workforce Definition

In outlining the Minimum Equity Standard, Section 1-75(c-10)(1) of the IPA Act states that “at least 10% of the *project workforce* for each entity participating in a procurement program outlined in this subsection (c-10) must be done by equity eligible persons or equity eligible contractors.” (emphasis added). This raises the question of what specifically constitutes a “project workforce.” For the purposes of the MES, the IPA defined “project workforce” as the following:

“Employees, contractors and their employees, and subcontractors and their employees, whose job duties are directly required by or substantially related to the development, construction, and operation of a project that is participating in or intended to participate in the IPA-administered programs and procurements under Section 1-75(c) of the IPA Act. This shall include both project installation workforce and workforce in administrative, sales, marketing, and technical roles where those workers’ duties are performed in Illinois.”⁹

The Agency received feedback from Program participants regarding challenges with the current approach. According to feedback, the breadth of occupations included in the project workforce makes it difficult to fully define which persons and subcontractors are part of the workforce for a given project, particularly if some of those positions include significant work performed out of state or are services requiring a relatively small portion of project hours (e.g., a surveyor assessing a site for two hours). Therefore, the Agency proposed adding the following language to the definition of “project workforce” and the ICC approved this change:

For purposes of this definition, ‘directly required by or substantially related to’ shall be construed to be any direct employee of the Approved Vendor, Designee, or Indexed REC contract holder, or any contractor and its employees whose contract exceeds 5% of the REC Contract value. Employees of contractors below that threshold may be counted toward the MES on a voluntary basis, but then all contractors below the 5% of REC contract value threshold must be included.¹⁰

As further clarified through the IPA’s 2024 Long-Term Renewable Resources Procurement Plan,¹¹ an entity’s project workforce for a given program year includes individuals employed, either directly or indirectly, during that program year who work on projects either already participating in an IPA

⁹ “Minimum Equity Standard Frequently Asked Questions for the Illinois Shines Program,” <https://illinoisabp.com/wp-content/uploads/2023/04/Minimum-Equity-Standard-FAQs-for-the-Illinois-Shines-Program-14-April-2023.pdf>.

¹⁰ Final Order at 155, ICC Docket No. 23-0714 (Feb. 20, 2024).

¹¹ [2024 Long-Term Renewable Resources Procurement Plan](#) at 357.

program or that are intended to participate in an IPA program. This includes employees or subcontractors that perform any work in service of a project during that program year, across all types of projects and work. The Agency includes non-construction activities in determining the project workforce where that non-construction work is performed in Illinois – that is, the individual is physically located in Illinois while performing their duties. The Agency adopted this definition in an effort to ensure the greatest access to the diverse range of economic opportunities created by solar development in Illinois.

1.4.2 Minimum Equity Standard

The Minimum Equity Standard is a cornerstone of the Equity Accountability System, designed to ensure a fair representation of EEPs and EECs in the clean energy sector. The MES establishes a baseline percentage of the project workforce that must consist of EEPs or EECs, fostering an inclusive workforce and promoting equity within the clean energy economy.

The MES is applicable to the project workforce for firms participating in certain IPA renewable energy programs and procurements. More specifically, Section 1-75(c-10)(1) of the IPA Act requires that, “at least 10% of the project workforce for each entity participating in a procurement program outlined in this subsection (c-10) must be done by equity eligible persons or equity eligible contractors. The Agency shall increase the minimum percentage each delivery year thereafter by increments that ensure a statewide average of 30% of the project workforce for each entity participating in a procurement program is done by equity eligible persons or equity eligible contractors by 2030.”

Compliance with the MES is monitored through the submission of compliance plans, mid-year progress reports, and year-end reports by participating entities. This structured approach ensures that equity is not just a goal but a measurable outcome of the Agency's renewable energy initiatives.

The IPA Act prohibits participation in Agency procurements and programs by an entity that failed to meet the MES in the prior delivery year, and Section 1-75(c-30) provides explicit authority for the Agency to deny participation or withhold certification from entities to enforce this standard.

In the event an entity is unable to meet the MES for a given delivery year, Section 1-75(c-10)(1)(D) of the IPA Act allows that entity to seek a waiver. The Agency retains the sole discretion to grant a waiver in rare circumstances where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standard.

1.4.2.1 Anticipated Minimum Equity Standard Increases

By law, the 2023-2024 Program Year (PY) was the first year for which the Minimum Equity Standard took effect. In the 2024 Long-Term Renewable Resource Procurement Plan, the Agency decided to maintain the current MES of 10% for the 2024-2025 Program Year and will increase it to 14% for the 2025-2026 PY. This decision is based on the need to first assess the results of achieving the current

MES before implementing a higher standard, particularly since the workforce training programs created by the CEJA are still in development and not yet enrolling participants.

The Act mandates that the MES should progressively increase each delivery year, reaching 30% by 2030. A slower initial rate of increase allows the solar industry to adapt to the new standards and provides time for workforce development and other programs administered by the Illinois Department of Commerce and Economic Opportunity to ramp up. In the 2024 Long-Term Plan, the Agency outlined a schedule for these MES increases. Each year after the 2024-2025 PY, the MES is scheduled to increase by 4% to ensure a balanced and sustainable growth in equity standards.

1.4.3 Equity Eligible Contractor Category and Advance of Capital

The EEC category within the Illinois Shines program ensures that Equity Eligible Contractors have exclusive access to EEC-dedicated distributed generation and community solar program capacity, fostering their participation and success in the solar market. Section 1-75(c)(1)(K)(vi) of the IPA Act states that at least 10% of the capacity of the Illinois Shines program must come from projects submitted by applicants that are EEC certified. This targeted approach helps level the playing field by reducing barriers to entry and promoting a diverse and inclusive contractor base.

Recognizing the financial barriers that EECs often face, the IPA Act includes an advance of capital (“AoC”) provision. Section 1-75(c)(1)(K)(iv) of the IPA Act allows for the potential “advance of capital” under Equity Eligible Contractor REC delivery contracts for projects submitted to the EEC Category “upon a demonstration of qualification or need[.]” This mechanism provides upfront financial assistance to Equity Eligible Contractors, reducing the burden of initial project costs and enabling them to participate in renewable energy projects. By alleviating these financial constraints, the AoC supports the growth and sustainability of EECs.

1.4.4 Equity Prioritizations in Competitive Procurements

For competitive procurements, Section 1-75(c-10)(3) of the IPA Act requires that the Agency “develop requirements for ensuring that competitive procurement processes, including utility-scale solar, utility-scale wind, and brownfield site photovoltaic projects, advance the equity goals” of the Act. Specifically, through its Long-Term Plan, the Agency has created “bid application requirements and a bid evaluation methodology” to prioritize proposals that involve higher participation of Equity Eligible Persons and Contractors. Bids that demonstrate a higher utilization of EECs and a significant portion of contract value flowing to equity-eligible contractors receive a price adjustment.¹² This approach ensures that equity considerations are integral to the selection process, promoting the inclusion of diverse contractors in large-scale renewable energy projects. Furthermore, bidders in competitive procurements will be required to meet the MES and the associated reporting requirements.

¹² This approach is further explained in Section 5.4.3 of the IPA’s 2024 Long-Term Renewable Resources Procurement Plan.

1.4.5 Data Collection and Reporting Requirements

Section 1-75(c-20) of the IPA Act directs the Agency to “collect data from program applicants in order to track and improve equitable distribution of benefits across Illinois communities for all procurements the Agency conducts.” Specifically, the law requires that the Agency collect demographic and geographic data, including racial and ethnic identity, from program applicants regarding their employees, contractors, and subcontractors. That data shall be aggregated and published annually, ensuring transparency and public accountability.

The IPA Act’s equity provisions empower the Agency to assess and attempt to ameliorate existing racial discrimination or disparities in the clean energy economy. Section 1-75(c-15)(2) directs the Agency to publish a report assessing the efficacy of the equity accountability system one year after implementation. As robust data collection and reporting are essential for assessing the effectiveness of the EAS, the Agency has collected and analyzed data from various sources, including compliance reports, demographic reports, and project applications. The Agency’s methodology for making this assessment is outlined further in Section 1.5 below.

After the EAS Assessment, section 1-75(c-15)(2) of the IPA Act directs the Agency to commission and publish a racial disparity study to “measure the presence and impact of discrimination on minority businesses and workers in Illinois’ clean energy economy” as a whole. The Agency shall collaborate with other relevant state agencies, including the Department of Commerce and Economic Opportunity and the Department of Labor, in conducting the disparity study.

1.4.5.1 Overview of the Equity Portal

Section 1-75(c-25) of the IPA Act requires that the Agency create an Energy Workforce Equity Portal (Portal) in consultation with the Department of Commerce and Economic Opportunity. The Portal is an online tool designed to facilitate the engagement of Equity Eligible Contractors and Persons on clean energy projects. The Portal helps connect clean energy companies with Equity Eligible Persons looking to work in the clean energy sector in Illinois. Making these connections is a key aspect of ensuring that the clean energy industry in Illinois grows in an equitable manner. Also, EEPs can use the Portal to post their availability for employers.

By incorporating these components, the Equity Accountability System outlines a robust framework for advancing equity in Illinois’ renewable energy sector. The IPA’s commitment to equity is reflected in the detailed provisions and mechanisms designed to create a more inclusive and just clean energy economy.

1.5 Objectives of the Assessment

Objectives of the EAS Assessment include the following:

To evaluate the effectiveness of the EAS in increasing participation of EEPs and EECs in IPA programs and procurements.

To identify areas for improvement and propose recommendations to ensure EAS is meeting its goals.

The primary objective of the EAS assessment is to evaluate the effectiveness of the system in increasing the participation of Equity Eligible Persons and Equity Eligible Contractors within IPA programs and procurements. By analyzing both quantitative and qualitative data, the assessment aims to provide a comprehensive understanding of how the EAS is performing and where improvements can be made.

In the short term, the assessment seeks to identify immediate areas for improvement and propose actionable recommendations to enhance the effectiveness of the EAS. This includes addressing any gaps or challenges identified in the first year of implementation and ensuring that the system is on track to meet its long-term equity goals.

In the long term, the assessment aims to establish a robust framework for continuous improvement and sustainability. By setting a baseline for future comparisons, the Agency can track progress over time and make data-driven decisions to promote equity in the renewable energy sector. The findings of the assessment will inform future policy and program decisions, ensuring that the benefits of the clean energy transition are equitably shared among all Illinois residents.

1.5.1 Equity Accountability System Assessment Scope

The scope of the EAS assessment is comprehensive, encompassing several critical components aimed at evaluating and enhancing equity within Illinois' renewable energy sector. These components include the MES, the EEC category, the AoC mechanism, and equity prioritizations in competitive procurements. The assessment will provide final recommendations based on a detailed analysis of data and stakeholder feedback.

1.5.2 Scope of the Assessment

Minimum Equity Standard (MES): The MES is a fundamental component of the EAS, requiring that a minimum percentage of the project workforce in renewable energy procurements consists of Equity Eligible Persons or Equity Eligible Contractors. Part 2 of the assessment will evaluate compliance with the MES across various project categories. This involves analyzing compliance plans, mid-year progress reports, and year-end reports submitted by participating entities. Part 2 of the assessment will also consider the effectiveness of the MES in promoting workforce diversity and inclusion, identifying any barriers to compliance, and proposing strategies to overcome these barriers.

Equity Eligible Contractor Category: The EEC category within the Illinois Shines program promotes projects submitted by Equity Eligible Contractors. The assessment will examine the

participation and performance of EECs in this category. This includes analyzing the number of EECs certified, the types of projects undertaken, the number of contracts awarded, the firms primarily benefitting from EEC category contract awards, and the overall amount of incentive funding committed to supporting EEC-applicant projects.

Advance of Capital: The Advance of Capital provides financial support to EECs in need of that support to help cover project costs. The assessment will analyze the utilization and impact of this mechanism, including the number of advance requests and challenges associated with requests received to date. The assessment will also identify any challenges or barriers faced by EECs in accessing this financial support and propose recommendations to enhance the effectiveness of the AoC process.

Equity Prioritizations in Competitive Procurements: The Agency incorporates bid adjustments in competitive procurements to prioritize proposals that involve higher participation of Equity Eligible Persons and Contractors. The assessment will evaluate the impact of these equity prioritizations on procurement outcomes, and the overall effectiveness of these prioritizations in promoting equity. The assessment will also consider stakeholder feedback on the procurement process and identify opportunities for improvement.

Data Collection and Reporting Requirements: Robust data collection and reporting are essential for assessing the effectiveness of the EAS. The Agency collects and analyzes data from various sources, including compliance reports, demographic reports, and project applications. The assessment will evaluate the adequacy and reliability of this data, identifying any gaps or limitations.

1.5.3 Equity Accountability System Assessment Plan

The EAS Assessment is structured into two distinct parts to accommodate the comprehensive review and analysis of the MES end-of-year compliance reports, which were received in July 2024. Currently, the Illinois Power Agency (IPA) is still in the process of evaluating this critical year-end data, which is necessary to gain a full understanding of the EAS's effectiveness. Consequently, the Agency plans to revisit and further assess the efficacy of the EAS in Part 2 of this assessment, slated for release in the coming months.

Part 1 of the assessment focuses on available data and insights, covering several key areas: MES Compliance Plans and Mid-Year Reports, the EEC category and AoC, competitive procurement bid adjustments, and the Portal. This initial analysis provides a foundational understanding of the current state and progress of the EAS.

Part 2 will delve deeper into the MES Year-End Reports, MES Waivers, workforce demographics, annual reporting data, and will culminate in an overall assessment of the EAS, complete with final recommendations for improvements. This bifurcated approach ensures that the assessment is as thorough and informed as possible, given the timing of data availability.

1.5.4 Limitations

There are inherent limitations in the assessment due to several factors. Firstly, the Agency is mandated to conduct the assessment after just the first year of full EAS implementation. Given the novelty of the program, the data currently available is limited, and as such, this assessment will serve primarily to establish a baseline against which future performance and impacts can be measured.

Feedback from external stakeholders echoed this sentiment, with many suggesting that conducting the assessment after a few years of implementation would provide a more accurate measurement of the EAS's impact. Additionally, stakeholders noted that the delayed implementation of CEJA training programs has resulted in an underdeveloped pipeline of trained individuals for the clean energy economy, thereby limiting the effectiveness of the EAS in meeting its equity goals.

1.6 Methodology

1.6.1 Data Collection Techniques

To build this Assessment, the Agency has relied on both qualitative and quantitative data.

As outlined further below, qualitative data was gathered through a variety of methods, including stakeholder interviews, surveys, roundtables, and feedback requests. These approaches were designed to capture detailed insights and perspectives from a diverse range of stakeholders, including EEPs, EECs, AVs, Designees, and Community-Based Organizations (CBOs). This qualitative data provides context and depth to the quantitative findings, highlighting both successes and challenges in the implementation of the EAS.

Quantitative data was or is in the process of being collected from multiple program sources, including MES Compliance Plans, MES Mid-Year Reports, MES Year-End Reports, MES Waivers, Advance of Capital requests, EEC applications, EEP applications, project applications, annual reports, and Portal data. For Part 1 of the Assessment, available data was analyzed to evaluate the overall effectiveness of the EAS.

1.6.2 Sources of Data and the Limitations of Each

Surveys

The purpose of stakeholder surveys is to gather feedback from various groups, including EEPs, EEC AV/Designees, non-EEC AV/Designees, and CBOs, regarding their experiences and insights on the EAS. In June 2024, four distinct surveys were distributed to these audiences, resulting in varying completion rates: 25 completed surveys from approximately 400+ EEPs, nine from 70+ CBOs, nine from 70+ EEC AV/Designees, and 129 from 1,000+ non-EEC AV/Designees. While the completion rate was relatively low, the feedback received was insightful and revealed common themes across different audiences. The main limitation is the small sample size, which constrains the generalizability of the findings, though it does provide valuable qualitative insights.

Interviews

Stakeholder interviews were conducted to further explore the observations and insights shared in the surveys. Survey respondents and key stakeholders were invited to participate in interviews to discuss their feedback on the EAS in more detail. Out of approximately 30 invitations, 14 interviews were conducted in early July 2024, including six CBOs, one non-EEC minority-owned clean energy company, five EECs, and two EEPs. Despite the small sample size, these interviews provided incredibly useful feedback and a deeper understanding of the diverse perspectives on the EAS.

Program Data

Program data is considered the cornerstone of the quantitative analysis, providing crucial insights into IPA's Illinois Shines program and competitive procurements. The data analyzed includes MES Compliance Plans, MES Mid-Year Reports, EEC applications, and Advance of Capital requests. The primary limitation of current program data is the incomplete picture it provides at this stage; much of the data needed to assess the EAS's effectiveness will be found in the MES Year-End Reports, which are not yet available and will be included in Part 2 of the assessment.

Portal Data

The Portal data offers quantitative insights into EEP registrations, Clean Jobs Postings, and Clean Energy Company Registrations. However, this data also has limitations, including incomplete information on EEPs since it only includes those EEPs registered through the Equity Portal. Additional EEP registrations will be reported in the MES Year-End Report and incorporated into Part 2 of the EAS Assessment.

Through this comprehensive data collection and analysis, the EAS Assessment aims to provide a detailed and nuanced evaluation of the current state of EAS, identifying both progress made and areas for improvement. The dual-part structure of the assessment will allow for a more informed and thorough analysis as additional data becomes available, ensuring that the IPA can effectively address the challenges and opportunities identified. This comprehensive approach ensures that the IPA can make informed decisions to increase access to Illinois' renewable energy sector, ultimately supporting the state's broader goals of sustainability and equity.

1.7 Report Structure/Organization

Chapter 1 – Introduction & Overview: This chapter provides a comprehensive introduction to the EAS Assessment, outlining the goals and objectives of the assessment. It offers an overview of the Illinois Power Agency's mission and the legislative mandates that underpin the EAS, setting the stage for the detailed analysis and evaluation presented in subsequent chapters.

Chapter 2 – MES: Chapter 2 delves into the MES detailing its implementation, compliance requirements, and its role in promoting workforce diversity and equity in the clean energy sector. It examines the quantitative and qualitative data collected on MES compliance, highlighting both achievements and challenges faced by stakeholders in meeting the standards.

Chapter 3 – EEC Category and AoC: This chapter focuses on the EEC category, exploring the types of projects undertaken and the benefits and barriers encountered by EECs. It also examines the Advance of Capital mechanism, analyzing the support provided to EECs to facilitate their participation in clean energy projects and discussing the challenges encountered.

Chapter 4 – Competitive Procurements: Chapter 4 investigates the competitive procurement processes within the EAS framework, assessing how bid adjustments and other measures are designed to enhance equity outcomes. It evaluates the effectiveness of these processes in promoting participation by historically marginalized communities and explores the challenges and opportunities associated with competitive bidding.

Chapter 5 – Equity Portal: This chapter examines the development and implementation of the Equity Portal, a critical tool for connecting EEPs with opportunities in the clean energy economy. It analyzes portal usage data, stakeholder feedback, and the portal's impact on facilitating equitable access to jobs and resources, highlighting both successes and areas for improvement.

Chapter 6 – Recommendations: The final chapter presents a set of recommendations aimed at enhancing the effectiveness of the EAS and addressing the challenges identified throughout the assessment. These recommendations are informed by the data and insights gathered in the previous chapters and provide actionable strategies for advancing equity in Illinois' clean energy sector. This chapter will be included in Part 2 of the assessment, where it will incorporate the comprehensive data and findings from the full evaluation period.

2 Minimum Equity Standard

The MES is a fundamental component of the EAS, designed to increase the participation of EEPs and EECs in the clean energy sector. By setting a baseline percentage of the project workforce that must be comprised of EEPs or EECs, the MES aims to develop an inclusive workforce and advance equity within the clean energy economy. The 2023-2024 PY, spanning from June 1, 2023, to May 31, 2024, was the first year the MES was implemented as a requirement, marking a significant milestone in the rollout of the EAS. This initial year serves as a critical period for setting the foundation and establishing benchmarks that will guide the ongoing efforts to achieve greater equity in the clean energy industry.

The MES is applicable to the project workforce for firms participating in the Illinois Shines program and the IPA's competitive procurements of Indexed REC's from utility-scale projects. Specifically, Section 1-75(c-10)(1) of the IPA Act requires that "at least 10% of the project workforce¹³ for each entity participating in a procurement program outlined in this subsection (c-10) must be done by equity eligible persons or equity eligible contractors."

2.1 Equity Eligible Persons – Definitions

Section 1-10 of the IPA Act defines "equity eligible persons" or "eligible persons" as "persons who would most benefit from equitable investments by the State designed to combat discrimination, specifically:

- graduates of or current or former participants in the Clean Jobs Workforce Network Program, Clean Energy Contractor Incubator Program, Illinois Climate Works Pre-apprentice Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multicultural jobs program
- persons who are graduates of or are currently enrolled in the foster care system
- persons who were formerly incarcerated
- persons whose primary residence is in an equity investment eligible community¹⁴

The Agency recognized that because the MES requires a project workforce to be comprised of "equity eligible persons or equity eligible contractors" under Section 1-75(c-10) of the IPA Act, some methodology must be developed to account for the collaboration with an EEC towards achievement

¹³ The IPA defines "project workforce" as "Employees, contractors and their employees, and subcontractors and their employees, whose job duties are directly required by or substantially related to the development, construction, and operation of a project that is participating in or intended to participate in the IPA-administered programs and procurements under Section 1-75(c) of the IPA Act. This shall include both project installation workforce and workforce in administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois." For purposes of this definition, 'directly required by or substantially related to' shall be construed to be any direct employee of the Approved Vendor, Designee, or Indexed REC contract holder, or any contractor and its employees whose contract exceeds 5% of the REC Contract value. Employees of contractors below that threshold may be counted toward the MES on a voluntary basis, but then all contractors below the 5% of REC contract value threshold must be included.

¹⁴ [Equity investment eligible communities](#) are geographic areas throughout Illinois which would most benefit from equitable investments by the State designed to combat discrimination. The eligible communities are: (1) [R3 Areas](#) as established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector; and (2) [Environmental justice communities](#), as defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.

of the MES. The Agency sought input from stakeholders, and the solicited comments demonstrated the tension between encouraging increased participation from EECs with a recognition that an EEC's workforce may not be made up entirely (or even primarily) of EEPs. Concerned with an approach that counting all employees of an EEC as EEPs could reduce the potential for EEPs to participate in the clean energy economy (and that such treatment may artificially inflate the reported number of EEPs engaged in the workforce), the Agency determined¹⁵ that it is appropriate to count EEPs employed by an EEC-certified subcontractor, including the EEP-owner of the EEC, as 1.5 employees in accounting for the MES. This provides added incentives for entities participating in the IPA's programs and procurements to engage with EEC subcontractors while also ensuring that EECs actually employ EEPs.

In developing MES-related guidance, the Agency has interpreted as "persons who were formerly incarcerated" as any individual who (i) was sentenced to a term of imprisonment, not including juvenile detention, after the disposition of one or more misdemeanor or felony charges; and (ii) has completed their sentence. There is no time limit or expiration regarding when the incarceration occurred. Additionally, "persons who are graduates of or are currently enrolled in the foster care system" for the purpose of the MES are defined as any individual who is currently or was formerly under the care of the Illinois Department of Children and Family Services, or a similar agency in another state. These decisions highlight how even seemingly clear statutory qualification criteria require critical interpretive decisions to provide certainty to participants and guide application process structure.

Other challenges have include ensuring that qualification on the basis of these definitions meets the spirit of promoting equity across the clean energy economy. During the development of the 2024 Long-Term Plan, the IPA sought stakeholder feedback on these qualification criteria, particularly focusing on the elements that have raised concerns during initial stages of implementation. One such issue was the category of EEPs who qualify through their primary residence in an EIEC. Stakeholders raised concerns that the "primary residence" criterion might be too broad, particularly in rapidly gentrifying areas where an address may no longer correlate with the economic challenges faced by residents. As these neighborhoods undergo demographic shifts, there is a risk that individuals who do not actually face significant barriers to entering the solar market could qualify for benefits intended for those who do. While the update to the Environmental Justice communities map in 2023 based on newly available 2020 census data¹⁶ somewhat alleviated concerns about EEPs qualifying via EIECs based on stale data, many EIECs still include residents of drastically different backgrounds and economic resources due to influxes of new residents and new housing stock. In these areas, there may be limited correlation between census block socioeconomics (used for determining whether an area is an EIEC, and thus whether individual residents qualify as EEPs) and individual socioeconomic status, as the wealth gap between residents on the same block may be several orders of magnitude.

Another challenge regarding this criterion is that individuals in disadvantaged communities or with limited incomes may often change residences due to unstable housing situations. As a result, this residency requirement could pose a problem in the inevitable scenario where someone who qualifies as an EEP at one point in the year may not at another point or in the next year. To address these concerns and ensure that the MES continues to serve those it was designed to help, the Agency

¹⁵ This determination is fully explained in the Agency's Rationale Document on MES Waiver Requests and Evaluations, published March 17, 2023. <https://illinoisshines.com/wp-content/uploads/2023/03/MES-Waiver-Rationale-31722-v002.pdf>.

¹⁶ "Updated Income-Eligibility and Environmental Justice Communities Maps Are Available," (June 1, 2023) [Updated Income-Eligibility and Environmental Justice Communities Maps are Available - Illinois Solar for All \(illinoisfa.com\)](https://illinoisshines.com/wp-content/uploads/2023/06/Updated-Income-Eligibility-and-Environmental-Justice-Communities-Maps-Are-Available-Illinois-Solar-for-All-illinoisfa.com).

decided to require that EEPs qualifying based on their primary residence renew their certification every two years.¹⁷ This aims to balance the need of ensuring proper implementation of the MES while minimizing administrative burden on EEPs. While the Agency recognizes that requiring renewal of EEP certification creates additional processes, the hope is that ongoing improvements to the Portal will balance out any potential increased burden on EEPs or AVs. Additionally, the Agency decided to require EEPs that serve as the majority-owner of an EEC and qualify as an EEP based on residency must renew their EEP certification annually as part of the annual renewal process for AVs.

The Agency also addressed potential complications from updates to the EIEC map. Changes to this map could affect the residency-based qualification of some EEPs. This year, the IPA updated the EIEC map to incorporate new Environmental Justice Community (EJC) areas and updated R3 Area designations. For the 2023-2024 PY, both the previous and new EJC and R3 maps will be used for certifying individuals as EEPs. If a future EIEC map update affects an individual's EEP status, it will not change until the EEPs next recertification date. Projects already under contract through the EEC category will not be affected by the loss of EEP status of the majority-owner EEP. Nor will any projects that have received points in project selection due to contracting with an EEC Designee be penalized for a downstream change in the EEC status of that Designee due to a map update.

Stakeholder feedback received during the development of the Long-Term Plan also called for expanding the definition of EEP to include more specific classifications, such as greater representation of women and minority communities. The legislature's decision to specify only four categories in the statutory definition, despite recognizing other potential barriers to discrimination, is seen as intentional. The IPA interprets this to mean that the focus should remain on the groups explicitly listed in the law. Additionally, the legislature's decision not to include the Craft Apprenticeship Program supported under Section 16-108.12(a)(2) of the PUA as a basis for qualification of EEPs, despite expressly including other workforce training programs from FEJA (those supported under (a)(1) and (a)(3)), indicates a deliberate choice. The IPA is committed to faithfully implementing this statutory definition as intended by the legislature.

2.2 Equity Eligible Persons – Registrations

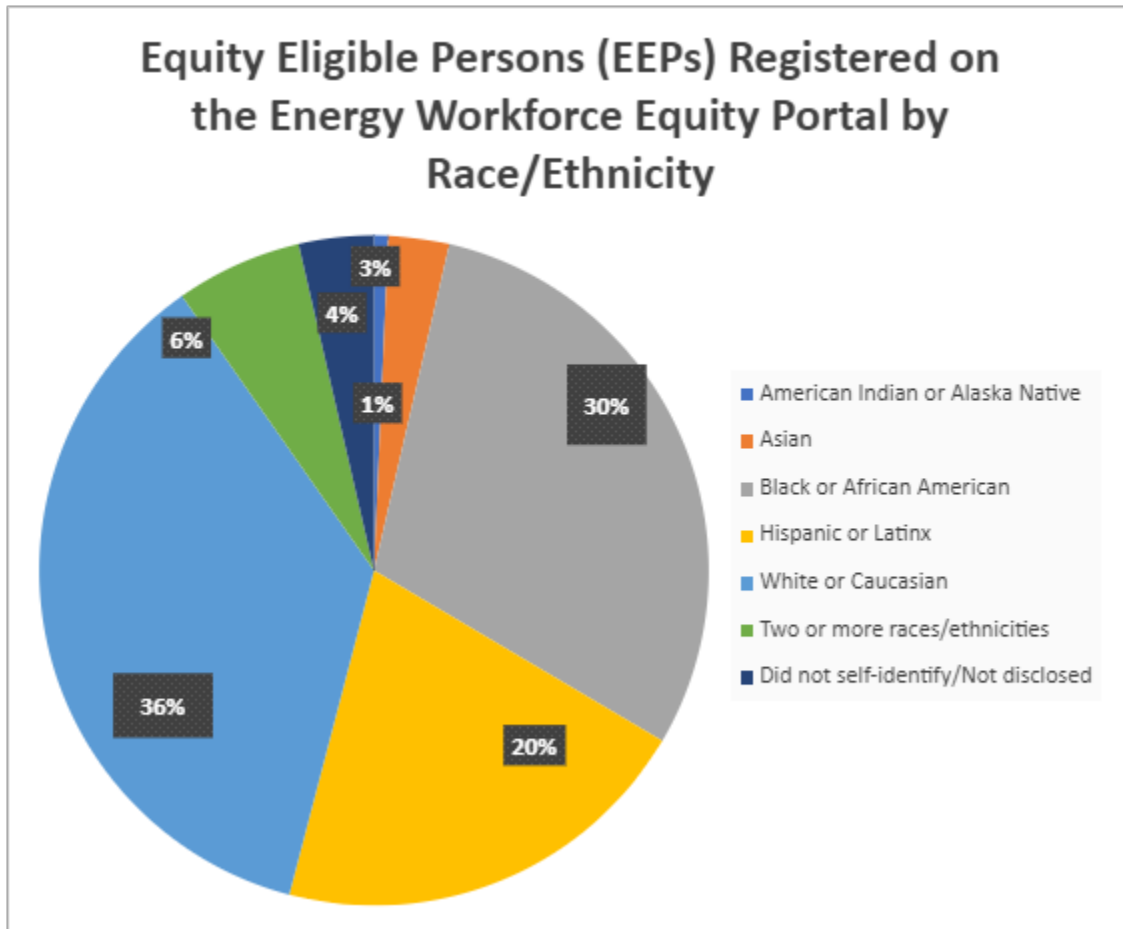
Between the launch of the Equity Portal on January 31, 2023 and the close of the 2023-2024 PY on May 31, 2024, the IPA approved 443 EEPs from a total of 549 applications submitted through the Portal.¹⁸ It is important to note that this is only part of the broader picture of EEPs working in the clean energy sector across the state, as Equity Portal certification is not required for EEP status. Additional EEP registration data from the Illinois Shines program will be reported in the MES Year-End Report and included in Part 2 of the EAS Assessment.

To be approved for EEP status, applicants must submit a complete application including supporting documents where needed. Individuals who qualify based on their primary residency in an EIEC or their participation in an eligible job training/workforce development program, are required to provide documentation verifies their eligibility. If additional information is needed, the Agency follows up with applicants to assist them in completing their submissions. Approval is granted once

¹⁷ 2024 Long-Term Plan at 205-206, 351-352.

¹⁸ As of August 9, 2024, 599 EEPs have now been approved through the Portal.

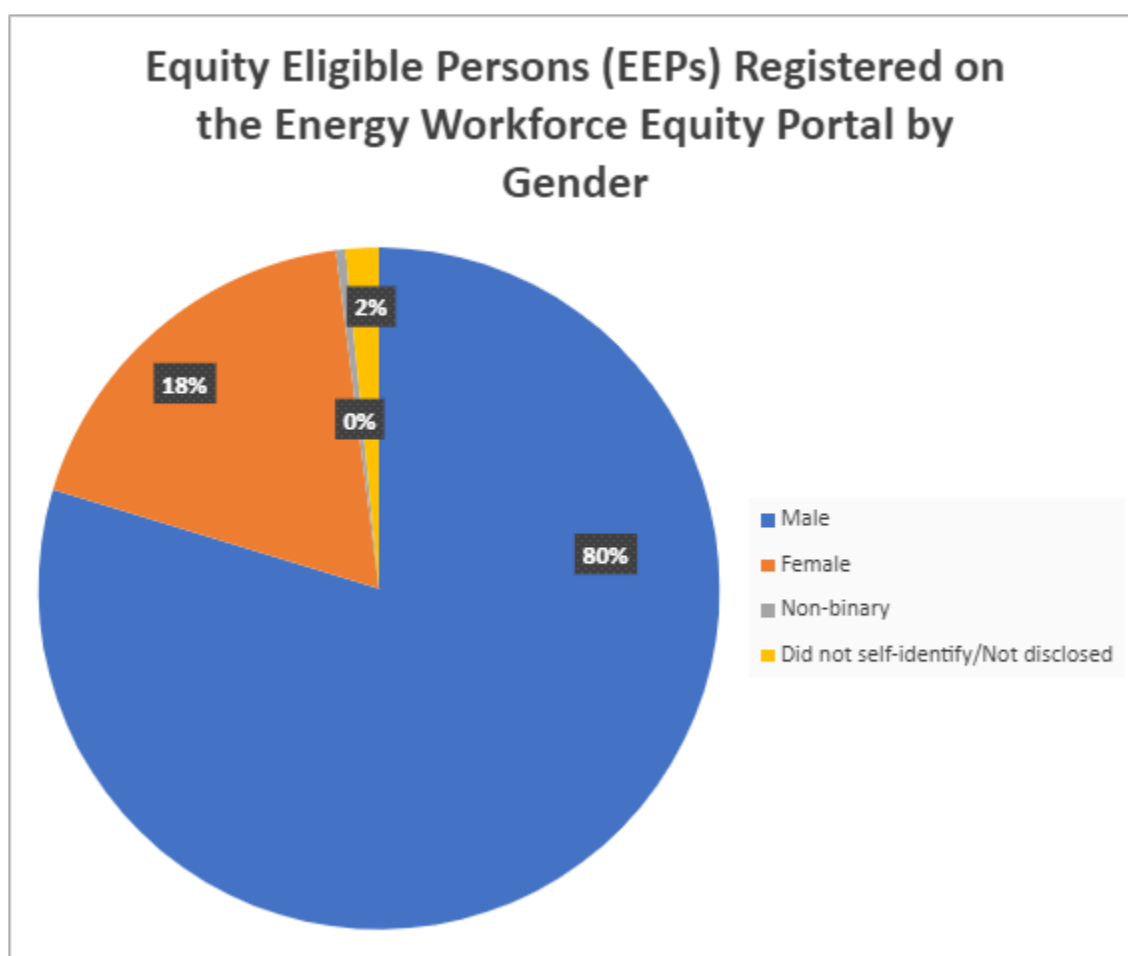
all necessary information and documentation is provided. If applicants do not respond after multiple follow-ups, the Agency may deny the application.



Source: Energy Workforce Equity Portal, Illinois Power Agency (February 1, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

The EEP registration data collected through the Portal reveals important trends in the racial and ethnic composition of the EEPs during this initial year of MES implementation. Of the 443 EEPs approved, the largest racial or ethnic group is White or Caucasian, comprising 36.12% of the total EEP population. Black or African American individuals represent 29.80%, followed by Hispanic or Latinx individuals at 20.54%. The percentages of Asian (2.93%), American Indian or Alaska Native (0.68%), and Native Hawaiian or Other Pacific Islander (0.23%) EEPs are relatively low, with 6.09% identifying as two or more races or ethnicities. Additionally, 3.61% of registrants did not self-identify their race or ethnicity.

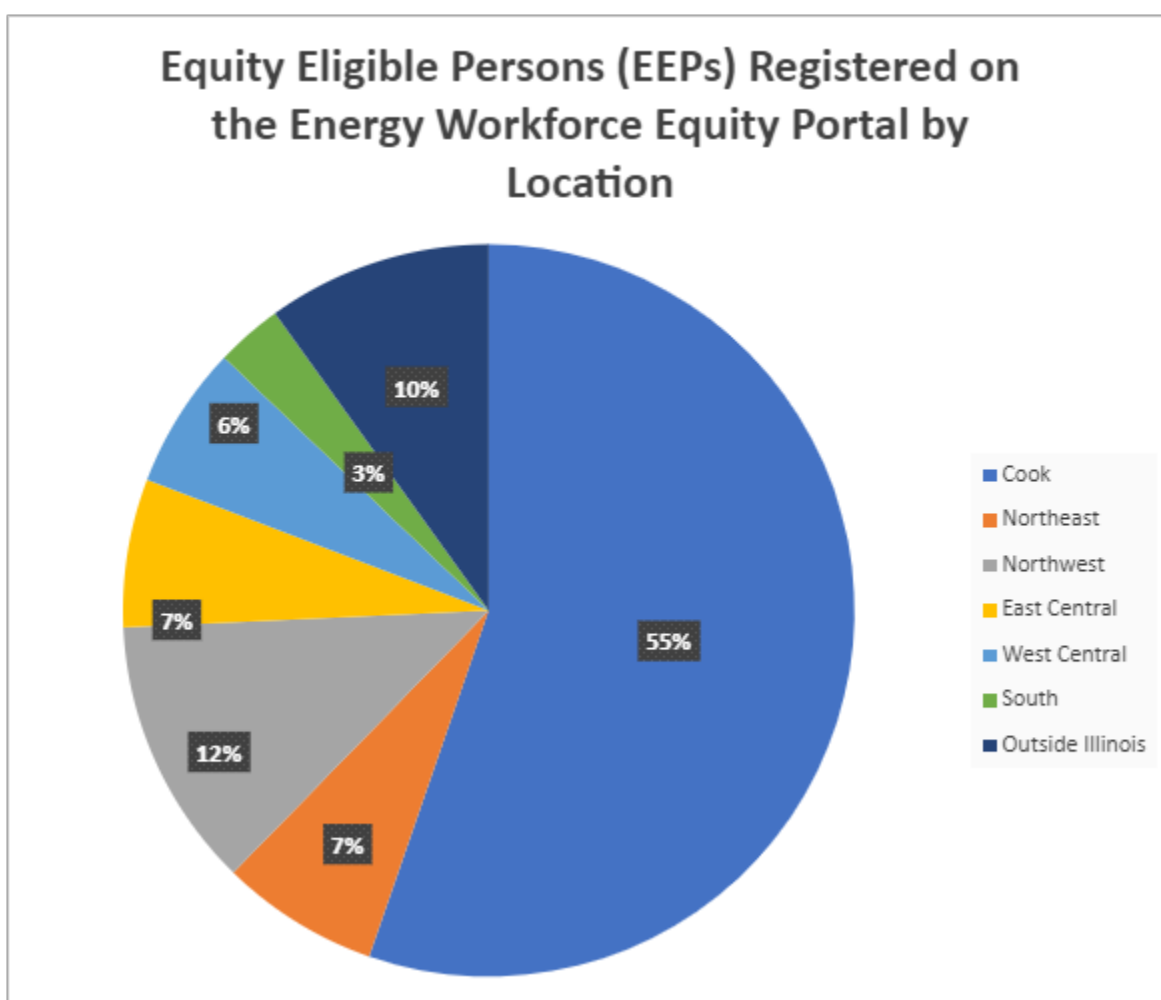
When compared to the national energy workforce data reported in the 2023 U.S. Energy and Employment Report¹⁹ (USEER), the representation of Black or African American EEPs in Illinois (29.80%) is significantly higher than representation in the broader U.S. energy workforce, where composition is only 9%. This suggests a positive trend towards greater racial diversity within Illinois' clean energy sector, at least across EEPs—indicating that the Equity Accountability System may be effective at promoting diversity. However, the representation of Hispanic or Latinx EEPs (20.54%) is only slightly higher than the national average of 18% in the energy workforce, which aligns closely with the broader U.S. workforce composition. The relatively low representation of Asian (2.93%) and American Indian or Alaska Native (0.68%) EEPs compared to their 7% and 2% representation in the national energy workforce, respectively, indicates areas where further outreach and engagement may be necessary to ensure equitable participation across all racial and ethnic groups.



Source: Energy Workforce Equity Portal, Illinois Power Agency (February 1, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

¹⁹ U.S. Department of Energy, [United States Energy & Employment Report 2023](#).

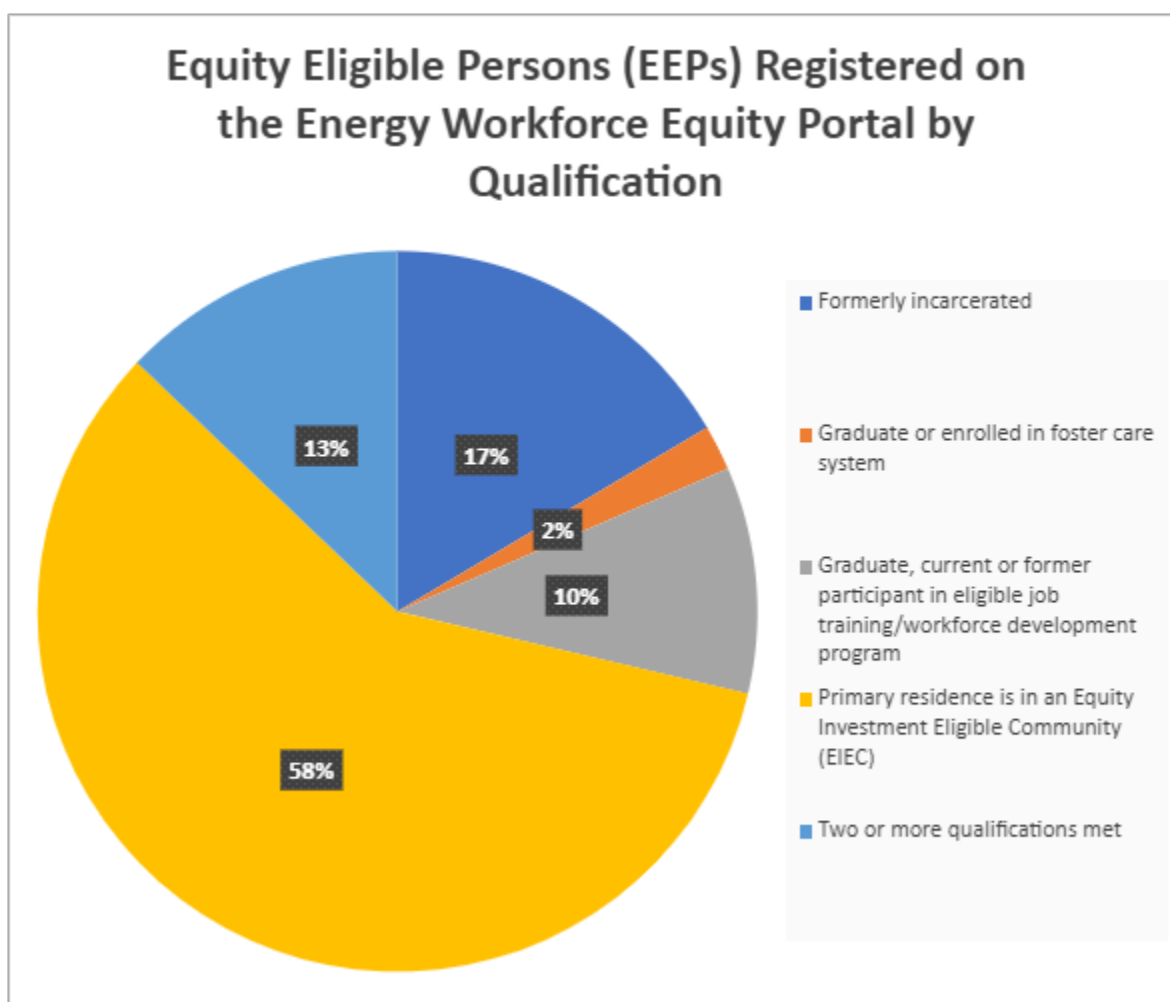
The gender distribution of EEPs shows a significant imbalance, with males comprising 79.68% of the approved EEPs, while females represent only 18.28%. Non-binary individuals account for only 0.45% of registrants, and 1.58% of registrants did not disclose their gender. This gender disparity within the EEP population is more pronounced than in the national energy workforce, where women make up 26% of the workforce according to the 2023 USEER. The lower representation of women among EEPs in Illinois indicates a need for targeted initiatives to increase female participation in the clean energy sector. Comparing this to the broader U.S. workforce, where women make up 47% of workers, it is clear that the clean energy industry, both nationally and within Illinois, remains male-dominated. The underrepresentation of women in Illinois' EEP registrations underscores the importance of implementing strategies to encourage and support more women in entering and thriving in the clean energy workforce. Furthermore, the minimal representation of non-binary individuals (0.45%) aligns with national trends, where gender non-binary workers constitute less than 1% of the energy workforce, highlighting a broader issue of inclusivity in the sector.



Source: Energy Workforce Equity Portal, Illinois Power Agency (February 1, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

Geographically, the majority of EEPs are concentrated in Cook County, which accounts for 55.30% of the total registrations (versus 41.1% of the state's population). The remaining EEPs are distributed

across various regions in Illinois, with the Northeast region representing 7.00%, Northwest 11.96%, West Central 6.32%, East Central 6.55%, and South 2.93%. Notably, 9.93% of the EEPs are located outside of Illinois as any individuals who perform work in Illinois, regardless of where they live, are counted towards the project workforce for the MES. Ensuring that all regions of Illinois, particularly those with lower participation rates, have access to the opportunities provided by the EAS will be crucial for achieving statewide equity goals.



Source: Energy Workforce Equity Portal, Illinois Power Agency (February 1, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

The EEP registration data on qualification criteria reveals that the majority of EEPs (58.47%) qualify based on their primary residence in an EIEC area, underscoring the importance of this category. Formerly incarcerated individuals make up 16.48% of EEPs, while those who have participated in or graduated from an eligible job training or workforce development program account for 10.16%. A smaller percentage (2.03%) of EEPs qualify based on their involvement in the foster care system, and 12.87% meet two or more of these criteria. Comparatively, the representation of formerly incarcerated individuals among EEPs (16.48%) is significantly higher than their representation in the national energy workforce, where they account for only 1% according to the 2023 USEER. This

indicates that the EAS is successfully reaching a demographic that has been traditionally underrepresented in the energy sector. However, the lower percentage of EEPs qualifying through foster care system involvement (2.03%) suggests an area where additional outreach may be needed to increase participation. The high reliance on geographic eligibility also highlights the need for continuous monitoring of EIEC boundaries to ensure they accurately reflect the communities most in need of support. In Part 2 of the EAS Assessment, the Agency will include a geographic breakdown on EEPs who qualify based on residency in an EIEC community in order to better understand this qualification category.

One of the challenges the Agency has heard from its stakeholders regarding EEP qualification is the absence of or delay in operational CEJA job training programs, as these programs are essential for providing the necessary skills and qualifications for EEPs. The low percentage (10.16%) of EEPs qualifying through their participation in or graduation from an eligible job training or workforce development program may support these observations. In interviews, stakeholders emphasized the urgent need for these programs to be fully operational to develop the pipeline of qualified candidates entering the clean energy economy.

Another significant challenge for formerly incarcerated individuals is the disclosure of their status, which can lead to stigma and potential biases in hiring practices. This issue was highlighted in survey feedback, where some stakeholders noted the invasiveness of such questions.

There is a notable gap in the availability of data and resources regarding participants and graduates of the foster care system, which impacts their ability to leverage the EEP status effectively. The lack of a centralized database for such graduates has been identified as a significant hurdle for entities looking to recruit and hire EEPs.

Finally, the designation of EIECs presents challenges, particularly in downstate regions where there might be mixed socio-economic levels. The criticism centers on ensuring that these areas accurately represent communities that have been historically disenfranchised and not simply broad geographic areas with mixed economic realities. Ensuring precise and targeted EIEC designations remains a key area of focus for ongoing updates to the map.

Stakeholders expressed overall satisfaction with the current definition of EEP but suggested expansions to include more specific classifications, such as greater representation of women and minoritized communities.

2.3 Minimum Equity Standard Rollout

To ensure a smooth and effective rollout of the MES, the Agency and the Illinois Shines Program Administrator undertook a comprehensive set of initiatives aimed at educating and supporting all entities required to comply with the new requirements. Recognizing the importance of clear communication and robust support systems, the Agency and Program Administrator developed and implemented multiple resources, outreach efforts, and responsive communication channels.

One of the key efforts included hosting a series of four dedicated MES webinars, which provided detailed guidance on compliance requirements, explained the objectives of the MES, and addressed

specific questions from participants.²⁰ These webinars were crucial for disseminating information and clarifying the expectations for Approved Vendors, Designees, and other stakeholders.

In addition to webinars, the IPA and Program Administrator developed and posted 12 MES forms and resources on the Illinois Shines website.²¹ These resources included detailed compliance guides, templates for MES Compliance Plans, and instructional documents to assist participants in meeting the MES requirements. Furthermore, 12 standalone MES announcements were published to keep all participants informed of the latest updates, deadlines, and critical information related to the MES.²²

To further support participants, the IPA and Program Administrator established responsive communication channels. From September 1, 2022, to May 31, 2024, they handled 881 MES-specific inquiries, ensuring that questions and concerns were addressed promptly and thoroughly. This level of engagement underscores the commitment to providing the necessary support and ensuring that all participants had the information they needed to comply with the new standards.

The Agency also made significant updates to its online presence to facilitate access to MES-related information. On September 15, 2022, an Equity Accountability System page was added to the Illinois Shines website, providing a centralized location for all MES-related resources. This page has been continuously updated and maintained to ensure it remained a reliable source of current information. Additionally, a Minimum Equity Standard section was added to the Vendor FAQs page²³ in 2023, further expanding the availability of MES guidance and clarifications for participants.

2.4 Minimum Equity Standard Compliance

The EAS took effect on June 1, 2023. To ensure compliance with the MES, AVs and Designees participating in the Illinois Shines program as well as entities awarded a REC contract through the Agency's competitive procurement process, are required to submit a series of documents throughout the program year: an initial MES Compliance Plan at the beginning of the program year or delivery year, a Mid-Year Report in December, and a Year-End Report in mid-July, 45 days after the program/delivery year ends. These documents outline how entities plan to and have achieved MES compliance across the annual reporting period.

The MES Compliance Plans serve as the initial blueprint for how entities plan to meet their equity obligations for the upcoming program year. These plans must include detailed information such as company contact information, attestation of compliance intent, workforce projections, current and projected numbers of EEPs, and plans for using EECs. The IPA and Program Administrator review these plans for completeness and offering corrective actions, if necessary.

During PY 2023-2024 of the Illinois Shines program, the submission rate for MES Compliance Plans was notably high. The Program Administrator received a total of 1,001 MES Compliance Plans, representing 97% of the participating entities. Approximately 30 entities were suspended during the year for failing to submit their MES Compliance Plans.

²⁰ See: <https://illinoisshines.com/webinars/>

²¹ See: <https://illinoisshines.com/equity-accountability-system/>

²² See: <https://illinoisshines.com/program-updates/>

²³ See: <https://illinoisshines.com/vendor-faqs/>

The Mid-Year Reports, submitted in December, serve as a critical checkpoint to assess whether entities are on track to meet their MES goals. These reports require entities to confirm the progress of their MES Compliance Plans and provide updates on any adjustments or challenges encountered. For the 2023-24 Program Year of the Illinois Shines program, the submission rate for Mid-Year Reports was significantly lower than that of the Compliance Plans, with only 273 reports received out of approximately 1,000 participating entities, resulting in a 27% submission rate. Of the reports submitted, 85% of entities indicated that they were on track to meet the MES requirements. It is worth noting that AVs and Designees were not penalized for failing to submit Mid-Year Reports, which may explain the lower submission rate. Nevertheless, the high compliance rate among those who did submit their reports is an encouraging sign of the program's initial success.

For competitive procurements, MES Compliance Plans and Mid-Year Reports are also mandatory. In the 2023-24 delivery year, the Agency received 31 Compliance Plans and 31 Mid-Year Reports from entities involved in Fall 2022, Summer 2023, and Fall 2023 Indexed REC competitive procurement events. All required reports were submitted, reflecting a 100% compliance rate. However, it is important to note that construction activities had only begun on one of the projects by the time of the Mid-Year Reports, and the seller indicated that they were on track to meet the MES. This early stage of project development underscores the need for ongoing monitoring and support to ensure that all entities fulfill their equity commitments as projects progress.

The Year-End Reports, which were submitted within 45 days after the end of the Illinois Shines program year or competitive procurements delivery year on May 31, 2024, will provide a final assessment of each entity's MES compliance. These reports will include detailed documentation of how MES targets were met, including certifications for each EEP employed and the use of EECs. As these reports are all still under review, the data from these reports will be included in Part 2 of the EAS Assessment as it a critical component to understanding the overall effectiveness of the EAS.

The initial data from MES Compliance Plans and Mid-Year Reports for the 2023-2024 program/delivery year indicate strong engagement and commitment to equity standards among participating entities. As the IPA continues to review and analyze Year-End Reports and other compliance data, the insights gained will be invaluable for refining and strengthening the EAS in future program years.

Companies providing feedback have observed both positive and negative impacts of MES compliance on their operations. While some reported enhanced intentionality in hiring and subcontracting, others noted significant costs and operational challenges. Common barriers to MES compliance include the lack of qualified candidates, especially in rural areas, perceived stigma associated with self-reporting EEP qualifications, and the complexity of tracking and reporting compliance data. Additionally, the delay in CEJA job training programs has been a significant hurdle for many stakeholders.

Stakeholders emphasized the need for more training programs, better coordination with unions, and enhanced support from the IPA to navigate the complexities of MES compliance. There is a strong demand for more comprehensive and accessible training programs that cover a wider range of skills needed in the clean energy sector. This includes both technical skills, such as installation and maintenance, and non-technical skills, such as sales and project management. Stakeholders seek improved collaboration with unions is essential to ensure a steady pipeline of qualified candidates who meet the MES criteria. Stakeholders have emphasized the need for unions to actively support

the MES goals and assist in the recruitment and training of EEPs. Simplifying the compliance processes and providing more clear and concise guidelines can help stakeholders navigate the requirements more effectively. This includes better documentation of the standards and more supportive tools to track and report compliance data.

While the MES has made strides in promoting workforce diversity and inclusion in Illinois' clean energy sector, several challenges and barriers remain. Addressing these issues requires a concerted effort from the IPA, stakeholders, and the broader community to ensure that the goals of the MES are fully realized and that all eligible individuals have equitable access to opportunities in the clean energy economy.

3 Equity Eligible Contractor Category and Advance of Capital

Another integral component of the Equity Accountability System (EAS) is the Equity Eligible Contractor (EEC) category and Advance of Capital (AoC) process of the Illinois Shines program. Both are designed to foster equity within Illinois' clean energy sector through the promotion and support of Equity Eligible Contractors. This chapter provides an analysis of EEC participation, the EEC category, and AoC process documenting the progress and challenges encountered in the Agency's efforts to achieve the equity goals set forth by the EAS.

3.1 Equity Eligible Contractors

Equity Eligible Contractors (EECs) are a core component of the EAS designed to ensure that historically marginalized communities have equitable access to the clean energy economy. EECs are businesses that are majority-owned by Equity Eligible Persons (EEPs), individuals from communities that have been historically excluded from economic opportunities. This designation aims to advance equity in the clean energy sector by providing these businesses with enhanced opportunities and support.

3.1.1 EEC Application Process

The process of becoming an EEC within the Illinois Shines program is designed to ensure that applicants meet the necessary qualifications while also facilitating an efficient application experience. The application process for becoming an EEC involves several key steps. Approved Vendors (AVs) that wish to submit projects under the EEC category must first be certified as an EEC. This certification can be completed either during the AV application process or any time afterward. To streamline the process, the Agency and the Program Administrator have included the EEC certification document in the AV application, ensuring that potential EECs do not miss critical steps that could affect their ability to participate in the program.

For entities organized as corporations, partnerships, or non-profits, applicants must designate which owners or board members meet the EEC eligibility criteria. If the AV is a sole proprietor, no additional designations are required. The EEC certification process requires applicants to complete an EEC certification in addition to the general AV attestation and application. The certification process may involve follow-up inquiries from the Program Administrator to clarify eligibility or request additional documentation. Additionally, the IPA requires annual re-certification of EECs to ensure ongoing compliance, particularly for those qualifying based on residency, to prevent potential gaming of the system.

The expected turnaround time for an EEC application can vary depending on the completeness of the submission and the volume of applications received. Generally, applicants can expect a decision within a few weeks of submission. However, if additional information or clarification is needed, the

review process may take longer as the Program Administrator will reach out to the applicant to resolve any outstanding issues.

This comprehensive approach is designed to facilitate the inclusion of diverse contractors in the clean energy economy while maintaining rigorous standards to ensure that only eligible entities benefit from the program.

3.1.2 EEC Support Services

The EEC application process within the Illinois Shines program is designed to be both straightforward and thorough, balancing the need for rigorous evaluation with the goal of minimizing barriers to entry for qualified contractors. For many EECs, particularly those new to the Program, gathering and submitting the required detailed documentation can be a time-consuming process. However, the Program Administrator provides extensive support throughout this process, ensuring that applicants receive the guidance they need to successfully complete their applications.

Recognizing the challenges that may arise during the application process, the Illinois Shines program offers a variety of supportive services tailored specifically to the needs of EECs. One key resource is the dedicated EEC Sector Strategist, who is well-versed in the unique opportunities and challenges faced by EECs. This strategist is available to provide personalized support and facilitate successful participation in the program, ensuring that EECs have the tools and information needed to navigate the complexities of the application and compliance processes.

In addition to the strategic support, EECs can request one-on-one meetings with the Program Administrator to address specific questions or concerns. These meetings offer a personalized opportunity to receive detailed guidance on program requirements, application procedures, and other relevant topics. This individualized support is a critical component of the program's commitment to reducing barriers and fostering a welcoming environment for EECs.

To further enhance accessibility, the Illinois Shines program hosts open office hours virtually every week. During these sessions, EECs and other stakeholders can call in to speak directly with the Program Administration team about any program-related topics. These office hours provide a regular, informal forum for real-time interaction, enabling participants to receive immediate assistance and clarifications on any issues they may encounter.

The program also organizes EEC Approved Vendor roundtable meetings. These roundtables serve as a platform for EECs to engage with the Program Administrator, discuss challenges, share insights, and provide feedback on the program. The feedback gathered from these roundtables is carefully considered by the Program Administrator and has often led to updates and improvements within the Program, demonstrating a commitment to continuous improvement based on participant experiences.²⁴

In addition to these direct support services, the Illinois Shines program actively seeks feedback through the AV/Designee Satisfaction Survey. This survey is distributed to program participants to gather their thoughts and opinions on various aspects of the program. The insights gained from these

²⁴ See: <https://illinoisshines.com/wp-content/uploads/2024/03/Mentorship-Pilot-Program-Final-Report-01March2024.pdf>.

surveys are instrumental in shaping future program enhancements, ensuring that the voices of EECs and other stakeholders are heard and acted upon.²⁵

The Illinois Shines program also promotes equity-focused training and networking events that may be of interest to EECs. These events are regularly featured in the program's weekly announcements, offering EECs opportunities to expand their education, build their networks, and strengthen their business operations. By sharing information about these events, the program helps EECs stay informed about industry developments and connect with other professionals in the clean energy sector.

Additionally, the Illinois Shines website features a category-specific hub dedicated to EECs.²⁶ This hub provides a centralized location for documents, news, and other resources directly related to EEC projects. The hub is regularly updated with relevant content, making it an invaluable resource for EECs seeking information about the program and its requirements.

In addition to the various support services offered to EECs, the Agency and Program Administrator developed a Mentorship Pilot Program,²⁷ which specifically targets minority-owned, woman-owned, veteran-owned, disability-owned, and small businesses. This initiative is designed to equip these businesses with the necessary knowledge and skills to successfully navigate and participate in the Illinois Shines program. The pilot program, which ran from October to December 2023, featured an intensive eight-week training presentation series provided to 12 Approved Vendors. The participants, referred to as "mentees," included 10 EECs, six small businesses, four minority-owned businesses, one veteran-owned business, and one disability-owned business.²⁸ By providing tailored training and support, the Mentorship Program not only helps participants understand program requirements and application procedures but also fosters a more inclusive clean energy economy. The success of the inaugural cohort will serve as a foundation for expanding and refining mentorship offerings, ultimately contributing to the long-term sustainability and diversity of the Illinois Shines program.

In summary, the Illinois Shines program offers a robust array of supportive services designed to assist EECs at every stage of their participation. From application submission to ongoing compliance, these resources help ensure that EECs can successfully navigate the program's requirements while contributing to Illinois' broader goals of equity and inclusion in the clean energy economy.

3.1.3 EEC Approved Vendors (AVs) and Designees

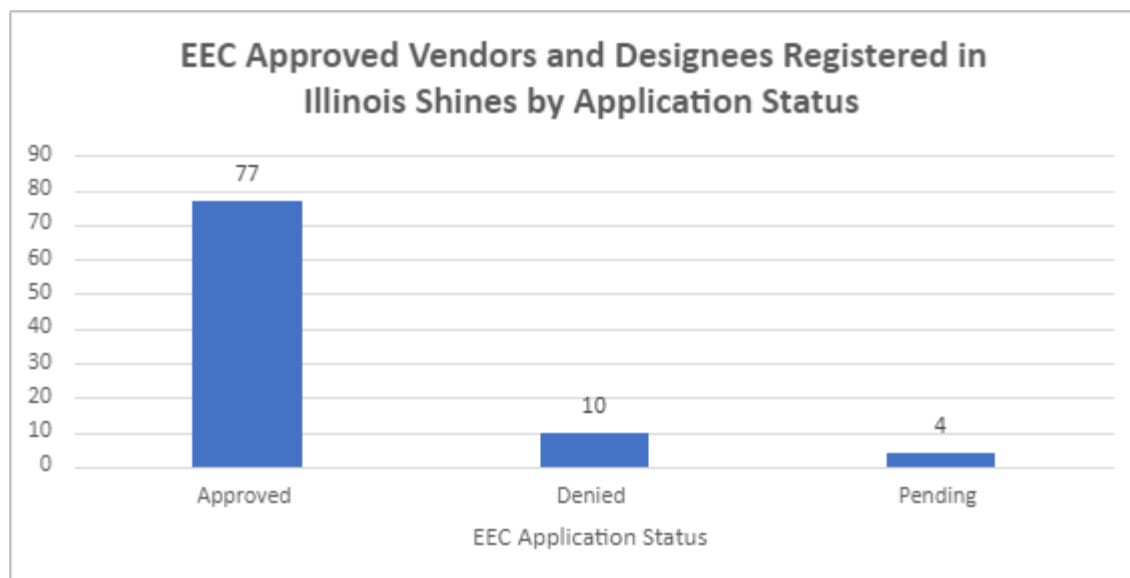
The EEC application data summarized below offers valuable insights into the participation and characteristics of EEC AVs and Designees within the Illinois Shines program.

²⁵ See: [2023-Illinois-Shines-AV-and-Designee-Program-Satisfaction-Survey-Results.pdf](https://illinoisshines.com/wp-content/uploads/2023/11/2023-Illinois-Shines-AV-and-Designee-Program-Satisfaction-Survey-Results.pdf) (illinoisshines.com)

²⁶ See: <https://illinoisshines.com/become-an-equity-eligible-contractor-eeec-approved-vendor-or-designee/>

²⁷ See: <https://illinoisshines.com/mentorship-program/>

²⁸ See: <https://illinoisshines.com/wp-content/uploads/2024/03/Mentorship-Pilot-Program-Final-Report-01March2024.pdf>



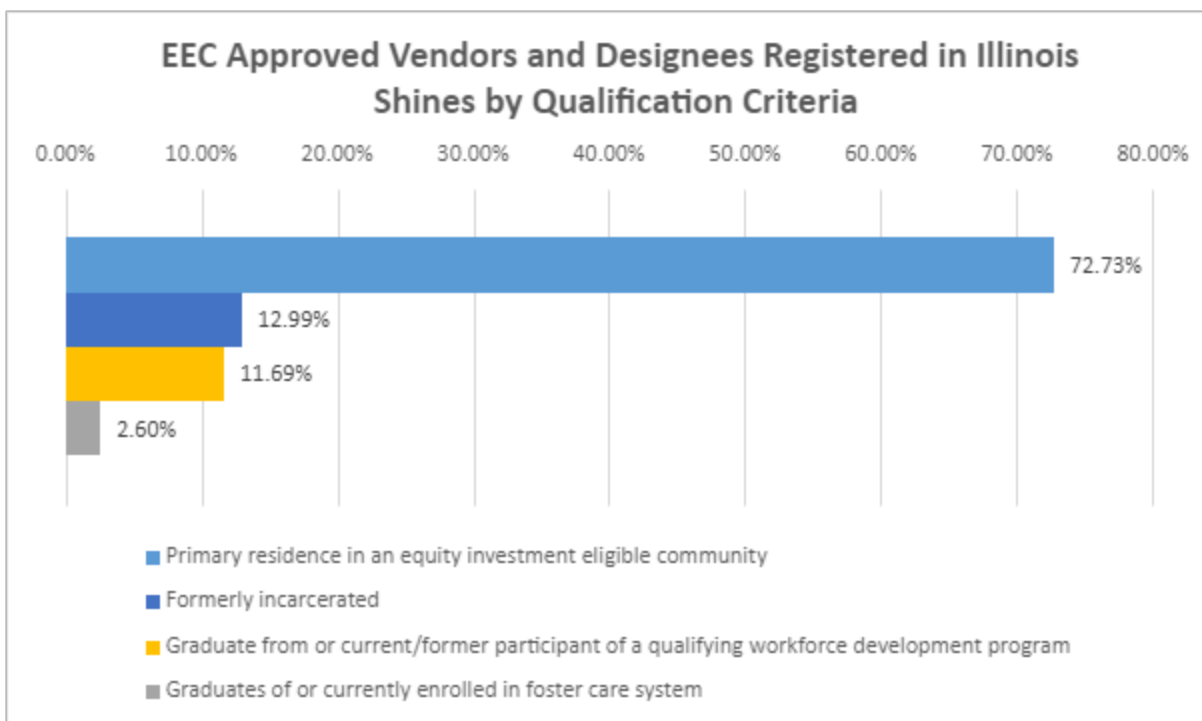
Source: Illinois Shines program, EEC AVs and Designees Application Data (October 2021-May 2024)

At the close of PY 2023-2024, a total of 77 EECs have been approved for participation in the Program. This approval rate represents a significant portion of the 91 applications received, with 77 approved, 10 denied, and four still pending. The reasons for EEC denials primarily include the inability to verify the company, duplicate applications, and errors in submissions. Among these approved EECs, 58 have been designated as AVs while 19 have been approved as Designees.²⁹

Through the 2023-2024 Program Year, EEC certification was limited to only AVs and Designees. The IPA began receiving feedback that emerging businesses that wish to become certified as EECs were facing a barrier because they could not become certified as an EEC Designee until having established a relationship with an AV. Beginning with the 2024-2025 PY, the Agency has established a process for subcontractors to be certified as EECs outside of the established Designee registration process.³⁰ To provide visibility into the identity of EEC subcontractors, a list of EEC-certified subcontractors will be listed on the Illinois Shines website as well as the Portal, just as is done for EEC-certified AVs and Designees.

²⁹ As of August 16, 2024, 78 EECs have been approved as Approved Vendors, 14 EECs have been approved as Designees, and 7 EECs have been approved as EEC subcontractors.

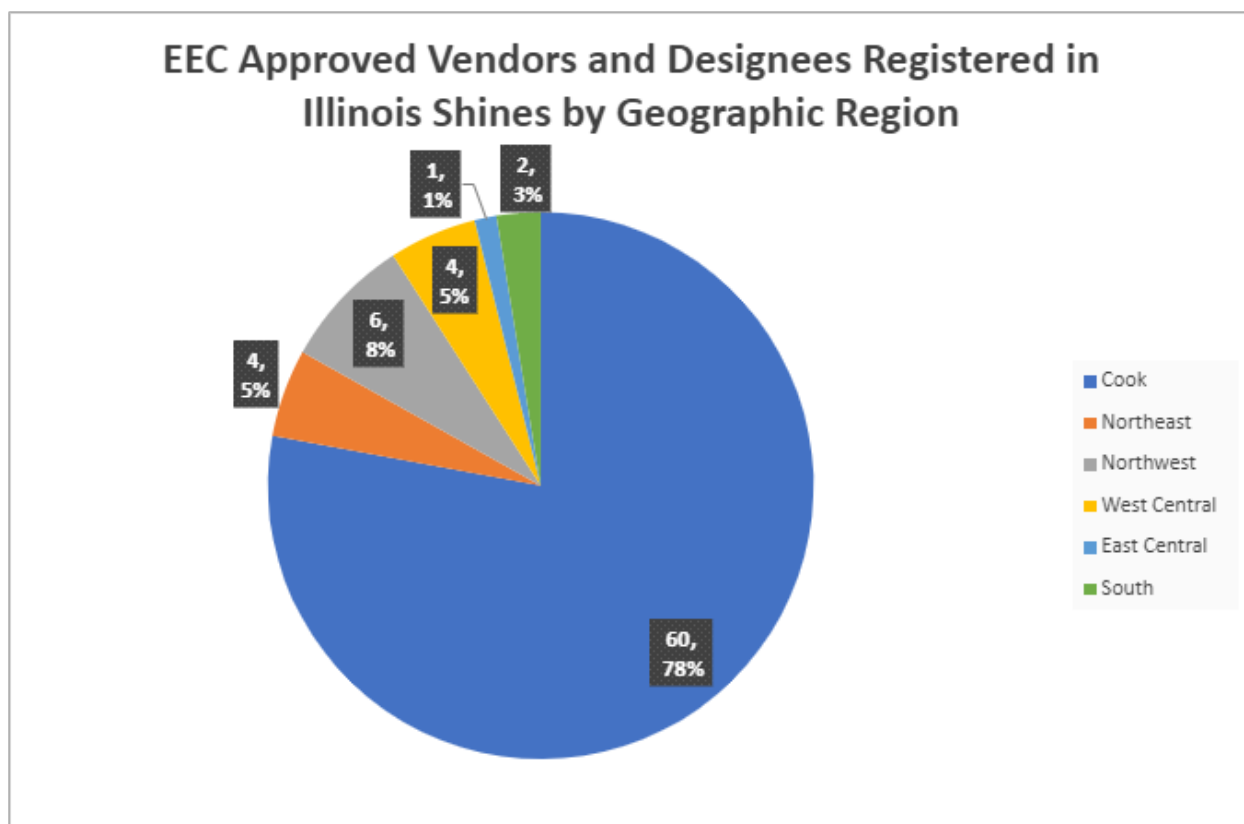
³⁰ <https://illinoisshines.com/eec-subcontractor-application-opens-june-3-2024/>.



Source: Illinois Shines program, EEC AVs and Designees Application Data (October 2021-May 2024). Only approved EEC applications (77 total) are included in data.

The qualification criteria for EEC AVs and Designees are somewhat diverse, reflecting the Program's aim to include various pathways to eligibility. The majority of EECs, accounting for 72.73%, qualify based on their primary residence in an EIEC.³¹ The remaining EEC's qualification basis included 12.99% being formerly incarcerated, 11.69% participating in or graduating from eligible job training or workforce development programs, and 2.60% being graduates or participants in the foster care system.

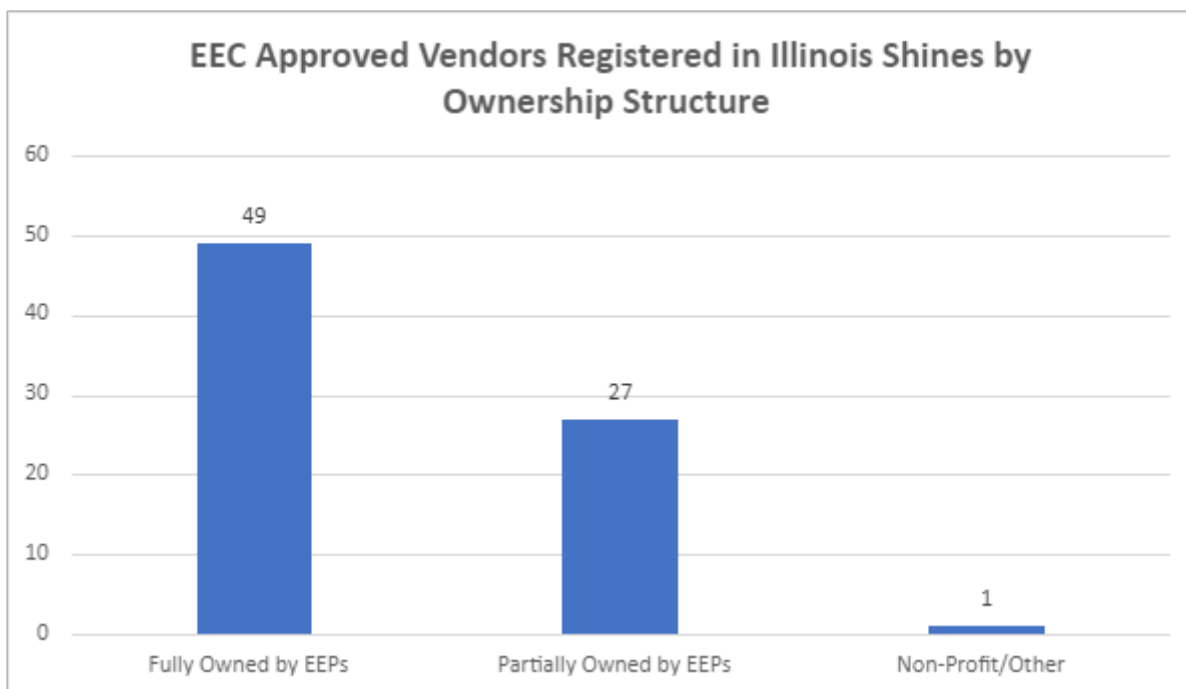
³¹ Equity investment eligible communities are geographic areas throughout Illinois which would most benefit from equitable investments by the State designed to combat discrimination. The eligible communities are: (1) R3 Areas as established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector; and (2) Environmental justice communities, as defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.



Source: Illinois Shines program, EEC AVs and Designees Application Data (October 2021-May 2024). Only approved EEC applications (77 total) are included in data.

Geographically, EEC businesses are predominantly located in Cook County, which hosts 72.13% of these businesses (while having over 41% of the state's residents). Given that EEPs who own EECs primarily qualify as EEPs on the basis of residency, and given the large number of EIEC communities across Cook County, this geographic balance is not surprising. However, certified EECs have at least some representation in other regions across Illinois, indicating statewide engagement and participation. Additionally, the location of an EEC is not necessarily indicative of where EECs may be developing projects; many EECs operate across various regions, including statewide.

While perhaps unsurprising, any geographic imbalance may present opportunities for improvement moving forward. As more EEPs who serve as majority owners of EECs qualify on a basis other than residency, we can expect to see a greater share of EECs from across the state. Additionally, recent updates to EIEC maps reflecting new R3 areas provide greater opportunity for EEP qualification on the basis of residency across Central and Southern Illinois, an item discussed further in Chapter 4.



Source: Illinois Shines program, EEC AVs and Designees Application Data (October 2021-May 2024). Only approved EEC applications (77 total) are included in data.

The ownership structure of these companies is varied. While 63.63% of the EECs were solely owned by EEPs, 35.06% have more complicated ownership structures involving EEPs and other entities, and a small fraction (1.29%) are organized as non-profits or other structures.

The Agency has observed that some EECs may be utilizing unconventional ownership structures to meet the EEC designation criteria without fully adhering to the spirit of promoting equity. A particular concern involves instances of “sleeving” and “pass-throughs,” where an established solar company forms a new entity with an EEP as the majority owner. In these cases, the EEP may have minimal involvement in the company’s management and operations, with the arrangement primarily serving to gain access to the EEC category within Illinois Shines. Another related issue arises when an EEC subcontracts out the majority of development and construction work, resulting in only a small portion of Renewable Energy Credit (REC) incentives actually benefiting the EEP.

The Agency has received multiple EEC certification requests in which ownership is nominally transferred to one or more EEPs, often based on residency within an EIEC. However, these EEPs frequently lack any significant role in the company, are not decision-makers, and often do not work in the energy sector or any related industry. In these cases, the minority owner, typically an established solar developer, appears to handle all substantive development and program application responsibilities.

This pattern of certification requests is concerning, particularly in areas undergoing gentrification where there is a wide disparity in income and resources among residents. The Agency is mindful of the potential for companies with substantial capital and expertise to dominate the EEC category, thereby diluting the intended impact of promoting genuine equity within the clean energy sector.

The Agency raised these concerns in its 2024 Long-Term Plan and sought to introduce two new requirements for EEC certification: 1) that majority-owner EEPs would be required to provide a demonstration of socio-economic status; and 2) the IPA proposed that an EEP or EEPs serving as the majority-owner(s) of an EEC must demonstrate that they have control of and are active in the management of the business - that they are not simply a silent partner(s). However, in approving the IPA's 2024 Long-Term Plan in ICC Docket No. 23-0714, the Illinois Commerce Commission declined to approve these modifications and instead directed the IPA to conduct stakeholder feedback process to identify "the best and most appropriate, balanced methods to prevent manipulation without overly burdening EEPs."³²

To that end, the Agency will be conducting a stakeholder feedback process in the coming months to identify enhancements to the EEC certification process. The feedback process will aim to gather input from various stakeholders, including EEPs, AVs, Designees, clean energy small businesses, and community-based organizations to ensure that entities seeking EEC certification are truly and permanently controlled by and benefit EEPs. The feedback request will focus on encouraging discussion of alternative strategies for demonstrating control or active management by EEPs, demonstration of socio-economic status of the majority-owner EEP(s), and to deter manipulation of the EEC category without unduly burdening EEPs.

3.1.4 EEC Stakeholder Feedback

Roundtable discussions, surveys, and interviews conducted with EECs and other stakeholders over the past year provided valuable insights into the benefits and challenges experienced by EECs. Many stakeholders highlighted the significant advantages brought by EEC certification, such as access to capital, enhanced legitimacy, and improved networking opportunities. For instance, respondents noted that EEC registration has opened doors to new projects and clients, enabling them to compete on a more level playing field within the fast-growing clean energy sector. However, these benefits are not without challenges.

One major challenge identified is the administrative burden of complying with Illinois Shines program requirements which can be a significant hurdle for smaller businesses with limited back-office resources. Additionally, the unpredictable nature of Program changes has also been cited as a barrier, complicating long-term business planning. The difficulty in obtaining financing remains a critical barrier, especially for small and emerging contractors who often struggle with accessing traditional forms of capital.

Stakeholders raised several issues regarding the current definition of EECs, suggesting expansions to include more specific classifications, such as greater representation of underserved contractors.

In terms of resource needs, stakeholders emphasized the necessity for enhanced training programs that cover both technical and non-technical skills relevant to the clean energy sector. Also cited was the need for more mentorship opportunities in the sector to connect new businesses with experienced developers, providing guidance and support necessary for sustainable workforce development. There were calls for increased publicity and better accessibility to the Portal and its

³² Final Order at 144, ICC Docket No. 23-0714 (Feb. 20, 2024).

resources, ensuring successful outreach for underserved communities to be fully aware of the opportunities available to them.

3.2 EEC Category in Illinois Shines

The EEC category was established to provide a dedicated pathway for EECs to participate in the Illinois Shines program. The Equity Eligible Contractor category features both distributed generation and community solar projects that have been submitted to the Program by AVs certified as EECs.

Section 1-75(c)(1)(K)(vi) of the IPA Act provides that at least 10% of the capacity of the Program shall come from projects submitted by Approved Vendors that are EEC certified, thus in the first year the EEC category was implemented in the Program, it comprised 10% of Program capacity. State law also requires that the IPA continuously grow the capacity available in this category over time.

The IPA began accepting applications for AVs to be certified as EECs three months after CEJA's enactment — on December 14, 2021, the same date on which the first block of capacity for the EEC category opened for applications as part of the re-opening of Illinois Shines outlined in P.A. 102-0662. During the program reopening period of December 14, 2021- June 30, 2022, the IPA did not receive a single project application into the EEC category and certified only three AVs as EECs. Thus, in the 2022 Long-Term Plan as approved by the Commission on July 14, 2022, the Agency had proposed to give the market for EEC projects time to develop over the course of PY 2022-23 and PY 2023-24 and the Agency determined it would not increase the portion the Program allocated to EEC projects above the minimum 10% level for those initial years.

Program Year 2022-2023 opened on September 1, 2022 for distributed generation project applications. The Agency did not receive any applications for DG projects in the EEC category through October 31, 2022, and had certified only 13 AVs as EECs as of that date. On November 1, 2022, the Program Administrator began accepting applications for community solar projects, including those submitted to the EEC category. The Program Administrator received 38 applications for community solar projects totaling 112.5 MW of capacity in Group A (covering Central and Southern Illinois) within the EEC category on the first day, greatly exceeding the full program year's allocated capacity for Group A on November 1.³³ EEC category capacity for Group B (covering Northern Illinois) filled in the weeks that followed.³⁴

To ensure that each valid application into the EEC category received a REC delivery contract, the IPA petitioned the Commission to reopen ICC Docket No. 22-0231 on December 2, 2022, and proposed a revised approach to the administration of the EEC category. Specifically, the IPA sought to modify the Long-Term Plan to increase Illinois Shines program capacity for to accommodate first-day projects submitted into the EEC category, with any unallocated 2022-2023 PY capacity from other categories used to meet that size increase (and thus not rolled over to the 2023-2024 program year), so as to net out total capacity to the extent possible in PY 2022-2023. This approach was ultimately approved by the Commission on May 4, 2023, through its Order on Reopening in ICC Docket No. 22-0231.³⁵

³³ See: <https://illinoisshines.com/update-next-steps-nov1/>.

³⁴ See: <https://illinoisshines.com/groupb-ee-soft-close/>.

³⁵ See: <https://illinoisshines.com/ee-ee-category-changes/>.

What the IPA had expected to be an EEC category which constituted 10% of the Illinois Shines program across the first two post-CEJA full program years (2022-23; 2023-24) actually became a category constituting *over 20%* of the Illinois Shines program, as demonstrated in the table below:

Equity Eligible Contractor Block Program Share by Program Year					
	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
Past Percentage of Program Share	10%	24%	21%	-	-
Future Percentage of Program Share	-	-	-	20%	20%

From a pure volume standpoint, the EEC category of Illinois Shines has been an unquestionable success: what was projected to be a slow climb has instead been a sharp increase to scale. But as with any quickly emerging market segment, that increase has not been without challenges.

The EEC category under Illinois Shines has shown substantial growth since its inception, with a total of 103 projects having been approved for REC delivery contracts by the Illinois Commerce Commission as of the close of the 2023-2024 Program Year. Notably, the majority of these projects have been Community Solar (CS) projects, with 102 CS projects and only 1 Distributed Generation (DG) project. This distribution highlights the dominance of community solar developments within the EEC category. The imbalance presents a concern for the Agency, which initially anticipated that small and emerging businesses would utilize the DG subcategory as a manageable entry point into the clean energy market. Distributed generation projects are generally smaller in scale compared to community solar, making them more accessible to businesses with fewer resources or less experience. While 25% of the EEC category is now reserved for DG projects (a change adopted by the IPA to promote more DG projects within the category), the continued predominance of community solar projects indicates that more support and outreach may be necessary to help small businesses take advantage of the DG subcategory.

When broken down by program year, the EEC category saw significant growth in PY 22-23, with 57 ICC-approved CS projects, and continued momentum in PY 23-24, with 46 additional ICC-approved projects (45 CS and 1 DG).

In terms of financial impact, the total value of Renewable Energy Credit (REC) delivery contracts awarded under the EEC category has reached approximately \$775.5 million (provided to Approved Vendors over 20 years of REC deliveries). This includes \$771.5 million for community solar projects and around \$4 million for distributed generation projects. The bulk of the contract value being tied to community solar further reinforces the trend toward larger-scale solar installations within the EEC category.

In addition to the financial and project volume data, a total of 345.7 MW of solar capacity has been approved under the EEC category as of the close of the 2023-2024 Program Year. Of this, 343.1 MW comes from CS projects, while DG projects contribute only 2.7 MW. The substantial total capacity approved highlights the impact that EEC projects are having on expanding solar energy deployment

across Illinois, further supporting the program's goal of creating equitable access to the clean energy economy.

As for the firms participating in the EEC category, 30 Approved Vendors (AVs) have secured contracts, with several companies standing out in terms of project volume. Leading the pack are 22C Development LLC, Livewire, Windfree, and Equity Solar Illinois LLC, which together account for almost 75% of the approved EEC projects. This concentration of projects among a few AVs may suggest that larger or more established AVs are better positioned to navigate the requirements of the Illinois Shines program.

The Agency regularly solicits feedback from stakeholders and EEC Program participants about eliminating or reducing barriers to participation in IPA programs in order to increase participation by EECs in the Program. The Agency has solicited this input through stakeholder feedback processes, surveys, interviews, and EEC roundtable discussions.

Stakeholders, especially EECs themselves, have reported that the EEC category has created substantial opportunities for contractors, including access to new markets, enhanced visibility, and the ability to leverage state support to grow their businesses. This category has been instrumental in leveling the playing field for historically marginalized contractors, allowing them to compete more effectively within the clean energy sector.

However, there are several challenges that need to be addressed. As outlined further above, one of the primary concerns is the potential for "sleeving" or "pass-throughs," where firms might nominally qualify as EECs without genuinely advancing equity goals. This practice undermines the integrity of the EEC designation and calls for stricter enforcement of qualification criteria. The geographic concentration of projects in urban areas, particularly Cook County, has raised concerns about equitable access to opportunities for contractors in rural regions. Stakeholders have emphasized the need for strategies to encourage project development in underserved areas to ensure that the benefits of the EEC category are distributed more evenly across the state.

Stakeholders also expressed concerns about the integrity of the EEC category, emphasizing the importance of robust oversight and enforcement from the Agency to prevent misuse and ensure that the category genuinely promotes equity. There were calls for more targeted support for small and emerging businesses, including access to capital, training programs, and mentorship opportunities, to help these businesses grow and succeed.

Another significant issue observed by the Agency is the lack of small projects within the EEC category, which hinders the development of a stepladder approach where small firms and projects can grow into larger, more complex undertakings. Addressing this gap requires more support for smaller projects and contractors, enabling them to scale up and take on more significant roles within the clean energy sector.

3.3 Advance of Capital

Another key feature of the EAS is the ability of Equity Eligible Contractors (EECs) to request an advance of a portion of REC Contract value prior to the associated project's Energization. Section 1-75(c)(1)(K)(iv) of the IPA Act allows for the potential "advance of capital" under equity eligible

contractor REC delivery contracts for projects submitted to the EEC category “upon a demonstration of qualification or need[.]” This capital advancement pre-Energization (or Part II application verification) constitutes a significant departure from the standard structure utilized under Illinois Shines REC Contracts (which feature payment only after verification of system Energization) and is intended to serve EEC-certified businesses exhibiting true need and to support a more diverse AV pool. This option is specifically designed to assist EECs by providing them with access to funds earlier in the project lifecycle, prior to the project's energization. The intent behind this provision is to level the playing field by ensuring that smaller, less experienced, or less liquid companies have the financial resources necessary to participate in the renewable energy sector. This capital advancement addresses the challenges that these businesses might face in covering upfront costs, thereby encouraging a more diverse pool of participants within the Illinois Shines program.

In Fall 2023, the Agency received over 30 requests for capital advances summing to over \$75 million, including many from firms or affiliates of firms with robust existing project portfolios—and thus not firms who were expected to require an advance of capital for overcome barriers to successful project development. While the Agency attempted to review requests on a case-by-case basis, the lack of established review and approval criteria posed significant challenges in distinguishing between applications to determine genuine need for capital advancement. As a result, the Agency decided to temporarily pause the submission and review of AoC requests in order to build out a more robust approach to the review and approval of those requests.

The Agency conducted a stakeholder feedback process in October 2023 to determine how to best evaluate requests for an advancement of capital for the EEC category, considering factors such as company size, ownership structure, project type, and financial need.³⁶ Based on the feedback received, the Agency developed a set of criteria to help the Agency identify EECs that have barriers to participation in the solar market and require an advance of capital to overcome those barriers, in accordance with the spirit and direction of the provisions of the IPA Act.³⁷ Since the implementation of the new evaluation criteria, the Agency has only received three AoC requests—all of which are currently under review.

The feedback gathered from stakeholders regarding the AoC process highlights the challenges associated with achieving greater equity across the clean energy economy. The high cost of capital, lack of collateral, and limited access to traditional financing are significant barriers for small and emerging businesses. Stakeholders have also cited the complex administrative requirements and documentation needed to apply for pre-energization capital advances as additional challenges, particularly for smaller businesses with limited resources—but with many of those requirements having been developed specifically to preclude gaming and abuse.

Concerns regarding the transparency and fairness of the AoC process were also highlighted. Ensuring that the evaluation criteria are clear, consistent, and applied equitably is essential to maintaining trust and confidence in the program. Stakeholders emphasized the need for more targeted support and resources to help businesses navigate the AoC process and meet the compliance requirements. This includes developing process guides, offering recorded webinars, and establishing mentorship opportunities to assist businesses in successfully obtaining and utilizing AoC funds. In response to this feedback, the Agency has taken several steps to ensure that EECs are better supported

³⁶ Stakeholder Feedback Request – Proposed Advance of Capital Evaluation Criteria:
<https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/request-for-feedback-on-aoc-scoring-criteria-30-oct2023.pdf>.

³⁷ <https://illinoisshines.com/advance-of-capital-evaluation-criteria-final-criteria-posted/>.

throughout the AoC process. The Program Administrator has designated a dedicated staff person to work closely with each AoC requester, ensuring that all necessary details of the request are present and that any issues are resolved promptly. Additionally, the Illinois Shines website³⁸ includes a dedicated section providing clear guidance on the AoC process. To further enhance support, the program is also planning to integrate the AoC request process into the curriculum for the Illinois Shines Mentorship Program. This will ensure that participating minority-owned, woman-owned, veteran-owned, or disability-owned businesses have the opportunity to understand and navigate the AoC process effectively. The Agency is committed to continuing to develop and refine resources for EECs navigating the AoC process, ensuring they are equipped with the necessary tools to access capital and grow their businesses.

³⁸ <https://illinoisshines.com/equity-accountability-system/>

4 Competitive Procurements

The Equity Accountability System also features two mechanisms used to promote equity across the Agency's competitive procurements which facilitate the development of new utility-scale wind, utility-scale solar, and brownfield site photovoltaic projects: application of the MES to the workforce of winning projects, and a bid selection adjustment for increased use of Equity Eligible Contractors in project development. Background on how the IPA supports the development of these projects and how the EAS promotes equity across those projects' workforce is the topic and focus of this Chapter.

4.1 Background On Utility-Scale Projects

Under Section 1-75(c)(1)(C) of the IPA Act, of the 45 million RECs required to meet the IPA Act's 2030 REC delivery target, 55% are to be procured from new solar photovoltaic projects and 45% are to be procured from new wind and (per recent statutory changes) new, modernized, or retooled hydropower projects. Of the 55% of RECs delivered from solar photovoltaic projects, at least 47% of those RECs are required to be from utility-scale solar projects and at least 3% are required to be from brownfield site photovoltaic projects—both of which are supported through competitive Indexed REC procurement events. All wind and hydropower projects supported are at least initially assumed to be supported through those same procurement events. Consequently, 72.5% of all RECs (45%, plus 50% of 55%) used to support the Illinois Renewable Portfolio Standard (RPS) are expected to be derived from projects supported through generally larger renewable energy projects awarded state-administered incentive contracts through the competitive procurements for which these specific equity initiatives apply.

By law, a utility-scale wind or solar project “has a nameplate capacity that is greater than 5,000 kilowatts” (5 MW). A brownfield site photovoltaic project need not be a utility-scale project, although many supported through IPA procurements to date have been. In practice, to benefit from economies of scale, utility-scale wind or solar projects tend to be substantially larger than that 5 MW minimum size; a project size on the order of 100 MW or 200 MW is more commonplace.³⁹ The IPA conducts two competitive procurements to support the development of these projects annually; given RPS target quantities and average utility-scale project size, each calendar year may feature contract awards to support 10-25 new utility-scale renewable energy projects (as contrasted with the tens of thousands of new <5MW solar projects supported annually under Illinois Shines).

Under Section 1-75(c)(1)(G)(v) of the IPA Act, “for all competitive procurements and any procurements of renewable energy credit from new utility-scale wind and new utility-scale photovoltaic projects, the Agency shall procure indexed renewable energy credits and direct respondents to offer a strike price.” This approach is fundamentally different than the approach used under the Illinois Shines and Illinois Solar for All programs; under those programs, developers of solar projects are aware of the state-administered incentive rate in advance through the IPA-published schedule of administratively established REC prices. But for competitive procurement processes, entities seeking to develop large-scale wind or solar projects *bid in* that price, with bids

³⁹ Results of procurements can be found on the Previous RFPs page of the ipa-energyrfp.com website: <https://www.ipa-energyrfp.com/previous-rfps/>.

selected in order of the lowest-priced offer (and thus the least state-administered incentive back) – subject to equity bid preferences outlined below.

Under the *Indexed* REC structure, that REC price is not a fixed price. Instead, a winning entity bids in a *Strike Price* (which is a fixed price), with the REC price determined after subtracting a real-time energy settlement price (the Index Price) from the Strike Price. If wholesale energy prices are high, then the Seller under the REC delivery contract (the solar or wind project developer) will receive a lower—and potentially even negative—REC price back, as the Seller will be adjudged as able to receive a larger share of necessary revenues back through energy sales. Conversely, if wholesale energy prices are low, the REC price increases to make up for assumed lower revenues. Indexed REC prices thus float over time based on wholesale energy market conditions.

As with most categories within Illinois Shines and all sub-programs within the Illinois Solar for All Program, by law, no REC delivery contract payments are made until a project is successfully developed and delivering RECs. Once REC deliveries commence, payments are made based on delivered RECs over 20 years. Consequently, the risk that a developer ignores equity requirements in project development and nevertheless receives incentive state-administered payments is mitigated, as a failure to comply during project development can place *expected* payments at risk.

While this explanation may seem overly technical for an assessment of the EAS, understanding this procurement process and contracting structure for supporting the development of new large-scale wind and solar projects is necessary to understand how the IPA can adjust that structure to encourage a more equitable workforce across those projects. The approach taken by the IPA is explained further below.

4.2 Equity Initiatives Across Utility-Scale Projects

The EAS promotes equity across the workforce and companies working to develop these projects in two primary ways. The first is through the MES: by law, “at least 10% of the project workforce . . . must be done by equity eligible persons or equity eligible contractors,” with that percentage increasing to 30% by 2030.⁴⁰ This MES applicable to the “project workforce” applies to the “procurement programs” outlined in Section 1-75(c-10), which the IPA understands to include the competitive procurements used to support new utility-scale solar, new utility-scale wind, new or retooled hydropower projects, and new brownfield site photovoltaic projects.

As the Agency is still in the process of reviewing and analyzing MES Year-End Reports received in July 2024, assessing the effectiveness of the MES across renewable energy projects supported by Indexed REC procurements would be premature. The Agency intends to revisit the effectiveness of the MES generally in Part 2 of this EAS Assessment, due to be released in the coming months.⁴¹

⁴⁰ 20 ILCS 3855/1-75(c-10)(1).

⁴¹ In addition to compliance reporting, bidders must also submit an attestation for meeting the MES or any commitments beyond the MES level; the most recent version of that document can be found here: https://www.ipa-energyvrfp.com/wp-content/uploads/2024/05/14_Indexed_REC_MES-Related-LOI-or-EPP-Employment-Requirements_1-MAY-2024-1.pdf.

The second mechanism found in the EAS for promoting more equity across these larger-scale renewable energy projects is outlined in Section 1-75(c-10)(3) of the IPA Act, which provides as follows:

(3) Equity Accountability System within competitive procurements. Through its long-term renewable resources procurement plan, the Agency shall develop requirements for ensuring that competitive procurement processes, including utility-scale solar, utility-scale wind, and brownfield site photovoltaic projects, advance the equity goals of this subsection (c-10). Subject to Commission approval, the Agency shall develop bid application requirements and a bid evaluation methodology for ensuring that utilization of equity eligible contractors, whether as bidders or as participants on project development, is optimized, including requiring that winning or successful applicants for utility-scale projects are or will partner with equity eligible contractors and giving preference to bids through which a higher portion of contract value flows to equity eligible contractors. To the extent practicable, entities participating in competitive procurements shall also be required to meet all the equity accountability requirements for approved vendors and their designees under this subsection (c-10). In developing these requirements, the Agency shall also consider whether equity goals can be further advanced through additional measures.

The IPA's approach to fulfilling this mandate can be found in Section 5.4.3 of the IPA's 2024 Long-Term Renewable Resources Procurement Plan. Initially developed for the IPA's 2022 Long-Term Plan and approved by the Illinois Commerce Commission in No. 22-0231, this approach was again proposed for the IPA's 2024 Long-Term Plan and, after being uncontested by any party, was again approved by the ICC in Docket No. 23-0714. The approach operates as follows:

The Agency will require applications from bidders wishing to qualify for such preferences to commit to a specific target Equity Standard above the MES set by Section 1-75(c-10). . . Based on a review of the plan submitted by a bidder, the Agency shall identify bids that demonstrate commitment and efforts above and beyond minimum requirements and utilize a bid evaluation price adjustment that increases as the portion of contract value flowing to equity eligible persons or contractors increases above the MES. Bid evaluation price adjustments are then made on a sliding scale based on the equity eligible commitment above the minimum requirement. For example, if a bidder commits to using equity eligible contractors for 50% of the project's development in a year for which the MES is 10%, then that bid's price adjustment shall be based on the ratio of 50% to the 10% minimum (or 5 times the amount of the minimum equity commitment).

The IPA will use a bid evaluation price adjustment for equity eligible commitments above the MES to be 1% of the lowest bid received times that ratio of the commitment to the 10% minimum. Like the adjustment for projects located in Energy Transition Community Grant areas, this adjustment will only be utilized for bid evaluation, and will not impact the resulting contracted Strike Price. As this equity commitment impacts bid selection, any project selected as a result of making an equity commitment shall have that commitment included as a binding commitment in the resulting REC contract.

In short, a greater commitment to hire or contract EEPs or EECs increases the likelihood of a project's selection for a REC delivery contract. While the Procurement Administrator has received compliance questions from firms considering utilizing this commitment, to date, the IPA is unaware of any bidder

formally availing itself of this equity-based bid evaluation preference when submitting a bid in an Indexed REC procurement event. As part of its 2026 Long-Term Plan development scheduled to begin in the Spring and Summer of 2025 in anticipation of an August 2025 draft Long-Term Plan release, the Agency plans to take stakeholder feedback around the sufficiency of this bid evaluation adjustment—is the adjustment large enough to be impactful?—and whether this particular bid evaluation mechanism is the most effective tool available for promoting more equity across large-scale renewable energy projects. Anecdotally, the IPA has instead heard feedback from developers of utility-scale wind and utility-scale solar projects that meeting *even a 10% MES* may be challenging—and thus being contractually bound to even higher commitments may be viewed unfavorably.

An additional factor potentially limiting use of this equity-driven bid preference is the consequence associated with a failure to meet additional equity commitments. Under Section 2.5(b) of the Indexed REC Contract, “[i]n the event that Seller fails to demonstrate, and the IPA is unable to verify,” the bidder’s fulfillment of its commitment to meet higher equity standards than the Minimum Equity Standard, “then an Event of Default shall be deemed to have occurred . . . and this Agreement shall be terminated.”⁴² Developing an effective and genuinely impactful equity-oriented bid adjustment mechanism presents a familiar policy challenge back: how to make that adjustment attractive enough to be utilized, but with penalties for non-compliance sufficient to guard against gaming or abuse. As with the magnitude of the equity-driven bid adjustment for project selection, the IPA plans to take stakeholder feedback on consequences for non-compliance in preparation for publishing its 2026 Long-Term Renewable Resources Procurement Plan.

4.3 Challenges Unique to Utility-Scale Projects

Imposing the EAS’s equity requirements on utility-scale projects offers back several challenges that are either not felt or less commonly felt across projects supported through the Illinois Shines.

Many of these challenges connect back to these projects’ size. Given the scale of utility-scale projects – one 200 MW utility-scale solar project features the installed capacity of over 25,000 average-sized residential rooftop solar projects –utility-scale wind and solar projects tend to be developed by large national or international companies who may approach workforce establishment differently than a local installer consistently and repeatedly developing projects in Illinois. Anecdotally, the IPA has been told by developers of large projects that they may be hiring contractors remotely and could be less familiar with a local workforce, or that they are heavily reliant on work contracted out to engineering, procurement, and construction firms for the establishment of that project workforce. This structure may create unique challenges in identifying Equity Eligible Persons or Contractors capable of performing project development and construction work. Additionally, each company one step further out from the company that directly receives incentives may be less familiar with meeting equity requirements as a condition placed on those incentives.

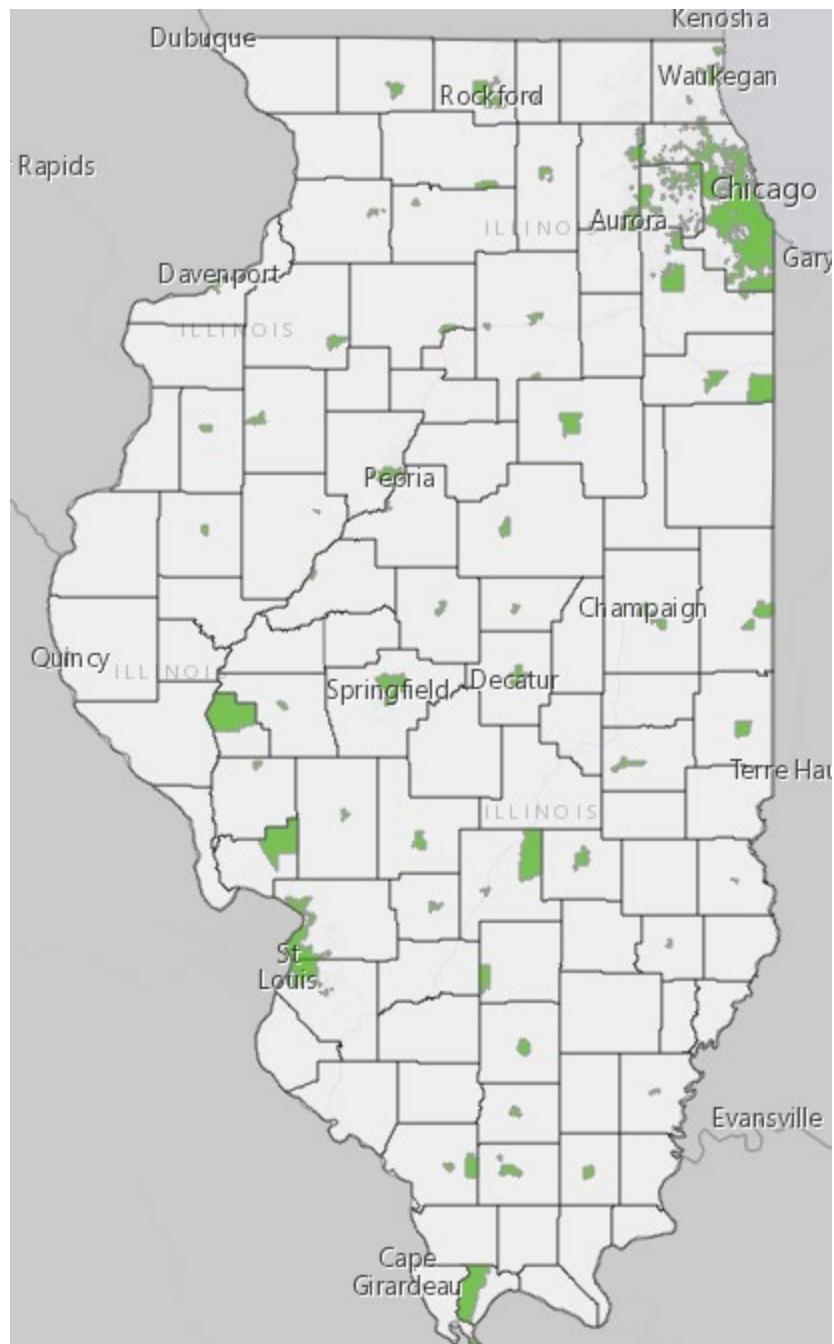
The IPA’s working estimate of the physical footprint of a renewable energy project is to assume a land footprint of eight acres for every megawatt of utility-scale solar and 80 acres for every megawatt of utility-scale wind. Under this scale, a 100 MW utility-scale solar project takes up approximately

⁴² <https://www.ipa-energyrfp.com/wp-content/uploads/2024/05/Indexed-Wind-Solar-Hydro-and-Brownfield-Final-Contract-1-MAY-2024-to-post.pdf>.

800 acres; for a 250 MW utility-scale wind project, the overall land footprint would be approximately 20,000 acres.⁴³ Land acquisition/leasing costs thus comprise a substantial portion of project costs. To be economically viable, these projects are generally sited in areas featuring lower land costs with larger swaths of available contiguous land—which tend to be more rural areas featuring less population density.

As outlined in Chapter 2, the most common means for qualifying EEPs is through that individual's primary residency in an EIEC—which includes both Environmental Justice Communities under the Illinois Solar for All Program and R3 communities. Notably, prior to Spring 2024, the EIEC maps offered relatively few areas for EEP qualification on the basis of residency in more rural areas:

⁴³ This is not to say that the entire land footprint of a wind farm is *used by wind turbines*; very little of a site is taken up by the turbines themselves. Instead, it is only to say that the overall project site comprising all turbines is generally very large—and thus suitable site locations are more limited.



However, after updates to R3 maps in the Spring of 2024, the EIEC map now features more geographic parity across the state:



As the IPA has not yet reviewed and analyzed MES Year-End Reports from developers of utility-scale projects (and as most utility-scale projects governed by the MES are yet to commence with construction), it is premature to say a) whether these geographic challenges have created an acute compliance problem or b) the degree to which recent R3 map updates have mitigated that challenge.

Unlike projects participating in the IPA's solar incentive programs, Illinois law expressly allows for utility-scale projects in adjacent states to be supported by the Illinois RPS "if the generator demonstrates and the Agency determines that the operation of such facility or facilities will help promote the State's interest in the health, safety, and welfare of its residents." The IPA's approach to making this eligibility determination is outlined in Chapter 4 of its Long-Term Renewable Resources

Procurement Plan. To date, roughly 10% of the utility-scale projects supported through competitive procurements have been located in adjacent states.

The IPA has not allowed an exemption to the MES for adjacent state projects – doing so would provide a highly undesirable non-compliance loophole, perversely incenting projects supported by Illinois ratepayers to be sited outside of Illinois, and no such exception is provided for in Illinois law – and the IPA’s means for scoring adjacent state projects for eligibility encourages projects to be located in closer geographic proximity to Illinois when in an adjacent state. Compliance with the MES should still be feasible even if the project is sited in nearby Iowa or Indiana. However, the degree to which non-Illinois projects provide a challenge to MES compliance is worth monitoring, and the IPA hopes to provide more analysis on this issue in Part 2 of this Assessment.

The development cycle of utility-scale projects also provides a unique challenge given the timing of this assessment. By law, the IPA is required to assess the EAS “[w]ithin one year after awarding contracts using the equity actions processes” found in Section 1-75(c-15) of the IPA Act. The IPA has interpreted this requirement to mean within one year after program participation became governed by the MES, thus resulting in an August 2024 initial assessment release date. The first utility-scale projects receiving contract awards featuring MES compliance requirements were selected in the IPA’s Fall 2022 Indexed REC procurement event, which featured contracts awarded in December 2022. Three additional Indexed REC procurement events have been conducted since, with another upcoming Indexed REC procurement scheduled for late 2024.

For the Illinois Shines program, the Agency expects to have sufficient data to assess the effectiveness of the EAS across new solar projects actually built. For instance, according to an April 2024 analysis by the IPA of the Illinois Shines program, more than 35,000 of the over 45,000 solar projects participating in the Program since CEJA’s September 2021 passage are built and operational. For these projects, that “project workforce” has been established, as the development and installation work for many such projects has already been completed. Utility-scale projects present a different challenge: even if a project was awarded a REC delivery contract in December 2022, it may not have even begun construction – and may not yet know its project workforce – less than two years later. Utility-scale projects often face substantial supply chain and interconnection delays resulting in project construction sometimes occurring three to five years after REC delivery contract award. Thus, while the IPA has not yet analyzed MES compliance reporting for these projects to fully understand compliance rates and challenges, we may have a paucity of useful data for assessment.

5 Energy Workforce Equity Portal

The Energy Workforce Equity Portal, launched on January 31, 2023, is a critical tool developed to enhance equity and inclusion within Illinois' clean energy economy. Section 1-75(c-25) of the Illinois Power Agency Act directs the Illinois Power Agency (IPA) to develop an online public-facing database that connects clean energy companies and developers with EEPs looking to work in the clean energy sector in Illinois. This online tool allows job seekers to register as EEPs as well as discover job opportunities, training programs, and other resources in the clean energy sector. Additionally, it allows developers of clean energy projects, such as AVs and Designees in the Illinois Shines program or developers of utility-scale wind and solar projects, to post clean energy jobs and recruit EEPs to achieve the MES. Making these connections is a key aspect of ensuring that the clean energy industry in Illinois grows in an equitable manner.

5.1 Background on the Energy Workforce Equity Portal

Phase 1 of the Portal focused on establishing the core functionalities necessary to support EEPs and clean energy companies. This development included several key features aimed at making connections between clean energy companies and EEPs:

- Information on qualifications and requirements for job seekers to become EEPs
- An application form to be certified as an EEP
- Job postings from clean energy companies seeking to hire EEPs
- A listing of EEPs who have voluntarily chosen to identify themselves to potential clean energy companies
- Information on workforce training programs administered by DCEO
- An EIEC map that can be utilized by anyone to determine if they, or someone they know, reside in an equity investment eligible community
- Contact information for EECs participating in the Illinois Shines program

Building on the success of the initial phase, Phase 2 launched in July 2023 and introduced several enhancements and expansions to the portal. These updates, guided by feedback from stakeholders, were aimed at improving the user experience and expanding the portal's functionalities:

- Information on resources for skill development to connect jobseekers to FEJA and CEJA workforce training programs as well as other education and training programs
- Updates of the EIEC map to include new Environmental Justice Community⁴⁴ areas and R3⁴⁵ areas
- Access to downloadable files of the EIEC map data

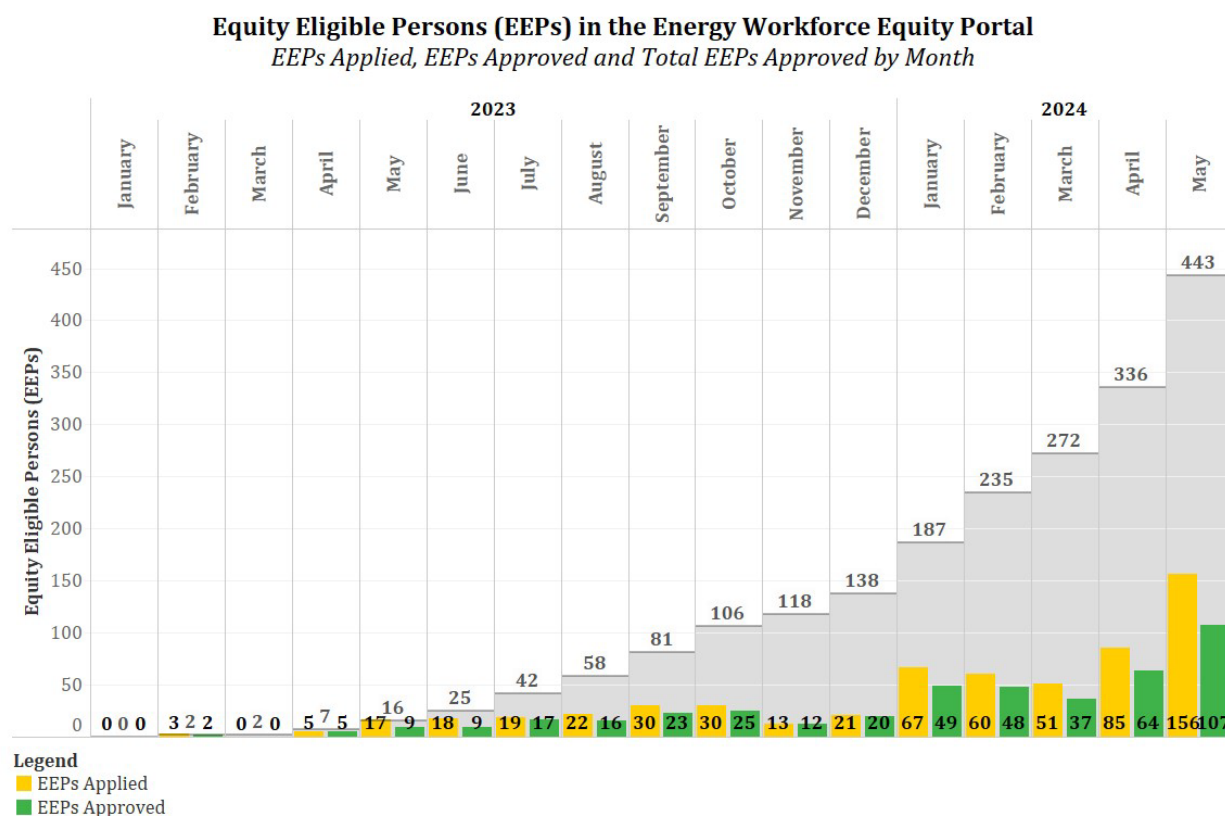
⁴⁴ Environmental justice communities, as defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.

⁴⁵ R3 Areas as established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector.⁴⁶ As of August 5, 2024, there have been an additional 257 EEP applications and 156 EEPs approved through the Energy Workforce Equity Portal.

- Additional layers to the EIEC map allowing users to overlay Illinois county, Illinois House and Senate district, and Chicago ward boundaries onto the map
- Publication of the FEJA Grantees List that allows clean energy companies to identify specific job training programs that qualify individuals to become EEPs
- Expansion of the EEP registration form to allow for employers and training providers to register EEPs
- Information on grants and funding opportunities for organizations at the state, federal, and local level

5.2 Equity Portal Utilization

The Portal has been a key resource in facilitating the connection between EEPs, clean energy companies, and job opportunities in the clean energy sector. Since its launch, the Equity Portal has seen substantial utilization, with a steady increase in EEP registrations, clean energy company registrations, and clean job postings over time.



Source: Diversity, Equity and Inclusion Bureau, Illinois Power Agency (May 2024)

Note: The reference line and shading represents the total EEPs approved.

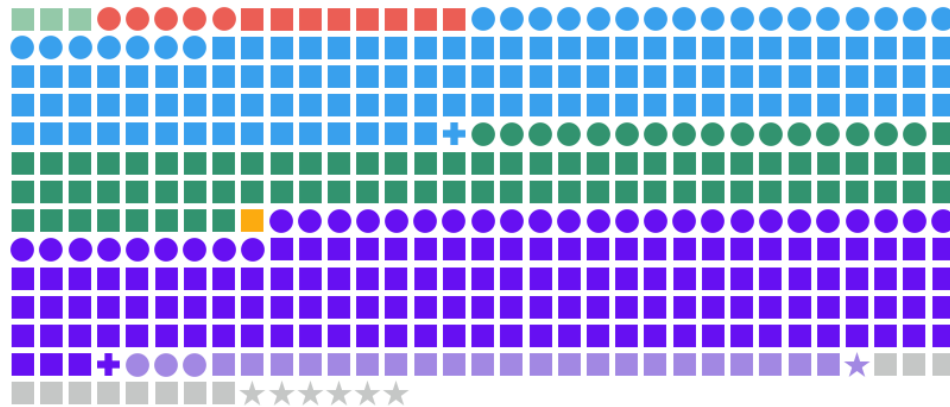
Source: Energy Workforce Equity Portal, Illinois Power Agency (January 31, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

Since the inception of the Portal through the end of the 2023-2024 Program Year, there have been a total of 597 EEP applications and 443 EEP approvals.⁴⁶ The data shows a positive trend in EEP applications and approvals, with notable spikes in April and May 2024 due to the end of the Program Year approaching. Individuals are denied EEP status when they are unable to provide verification that they have met one of the qualifications that requires additional documentation (primary residency in an EIEC, and graduation from or participation in eligible job training/workforce development programs) or when they have not provided a complete application. When additional documentation is required, the Agency reaches out to the individual who applied to obtain that information. If there is no response after multiple follow-ups, the Agency may see it fit to deny the application.

⁴⁶ As of August 5, 2024, there have been an additional 257 EEP applications and 156 EEPs approved through the Energy Workforce Equity Portal.

Equity Eligible Persons (EEPs) Registered in the Energy Workforce Equity Portal

Gender, Race and/or Ethnicities Reported in Registration



Gender

- Female
- Male
- ✚ Non-Binary
- ★ Did not self-identify/Not disclosure

EEPs

81 persons
353 persons
2 persons
7 persons

Percentage of Total EEPs

18.28%
79.68%
0.45%
1.58%

Race and/or Ethnicities

- American Indian or Alaska Native
- Asian
- Black or African-American
- Hispanic or Latinx
- Native Hawaiian or Other Pacific Islander
- White or Caucasian
- Two or more races
- Did not self-identify/Not disclosed

EEPs

3 persons
13 persons
132 persons
91 persons
1 persons
160 persons
26 persons
17 persons

Percentage of Total EEPs

0.68%
2.93%
29.80%
20.54%
0.23%
36.12%
5.87%
3.84%

Source: Diversity, Equity and Inclusion Bureau, Illinois Power Agency (May 2024)

Note: The gender, race and/or ethnicity reflected is collected during the EEP registration process on the Portal. The option of *Two or more races* is available as its own option. For the purpose of this visualization when two or more races were reported, they are reported as under the *Two or more races* option.

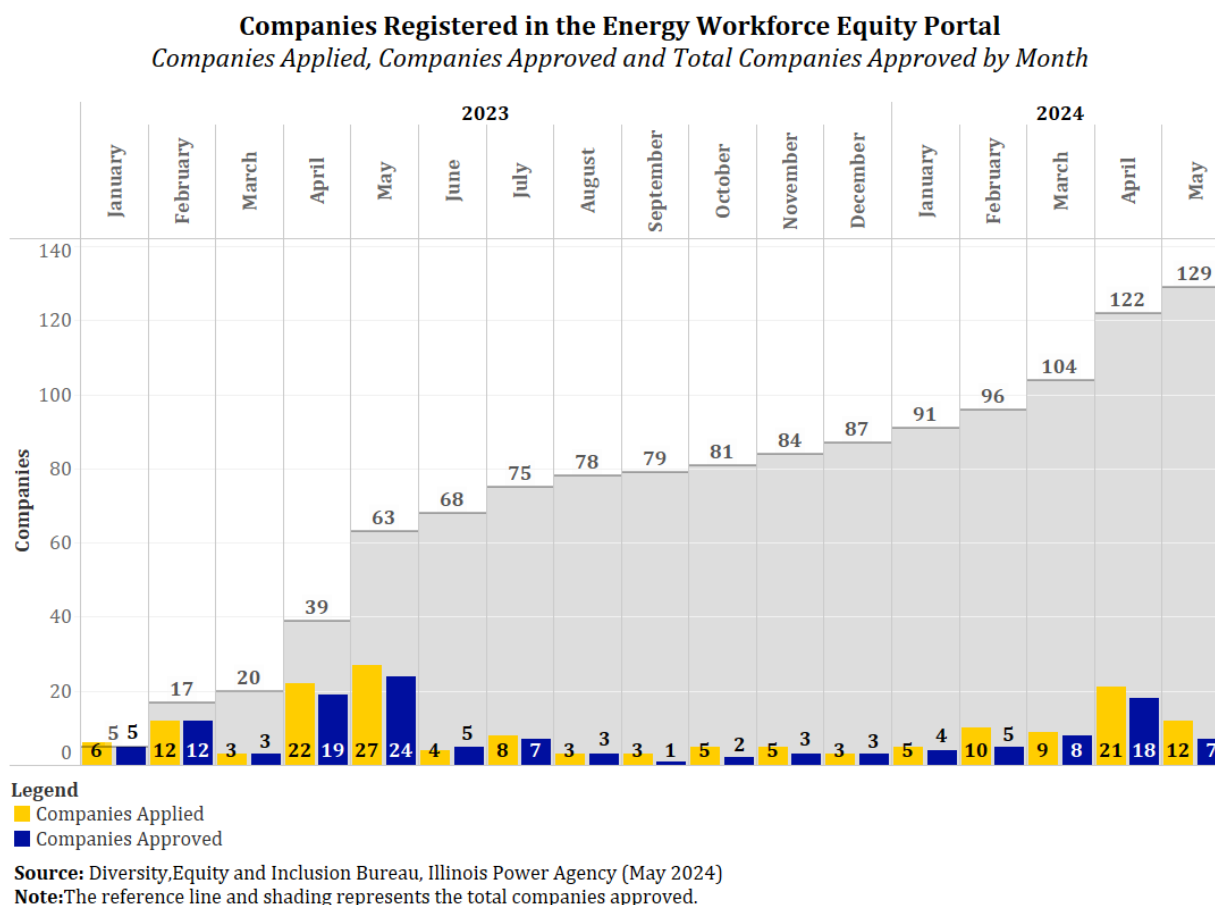
Source: Energy Workforce Equity Portal, Illinois Power Agency (January 31, 2023—May 31, 2024). Only approved EEP applications (443 total) are included in data.

The EEP registration data from the Equity Portal reveals valuable insights into the diversity of individuals participating in the clean energy sector in Illinois. A total of 443 EEPs have registered through the Portal, with notable differences in both gender and racial/ethnic representation.

In terms of gender, the data highlights a significant disparity between male and female participants. Approximately 79.68% (353 individuals) of registered EEPs identified as male, whereas 18.28% (81 individuals) identified as female. This gender imbalance aligns with trends seen in the broader energy sector. Non-binary individuals make up 0.45% percentage, with 2 participants self-identifying as such, while 7 individuals (1.58%) chose not to disclose their gender.

Racial and ethnic diversity among EEPs shows some variation, though white or Caucasian EEPs make up the largest group at 36.12% (160 individuals), followed closely by Black or African American EEPs at 29.80% (132 individuals). Hispanic or Latinx individuals represent 20.54% (91 individuals) of the total, while Asian individuals account for 2.93% (13 individuals), and Native American or Alaska Native individuals represent 0.68% (3 individuals). One individual identified as Native Hawaiian or Other Pacific Islander, making up 0.23% of the total. Additionally, 26 individuals (5.87%) identified as being of two or more races, and 17 (3.84%) chose not to disclose their racial or ethnic identity.

Overall, the data reflects a diverse pool of EEPs, though there are notable imbalances in both gender and race. The relatively high participation of Black or African American and Hispanic or Latinx individuals is encouraging for promoting diversity in the clean energy sector, yet the gender disparity points to a continuing challenge in achieving balanced representation across the workforce.

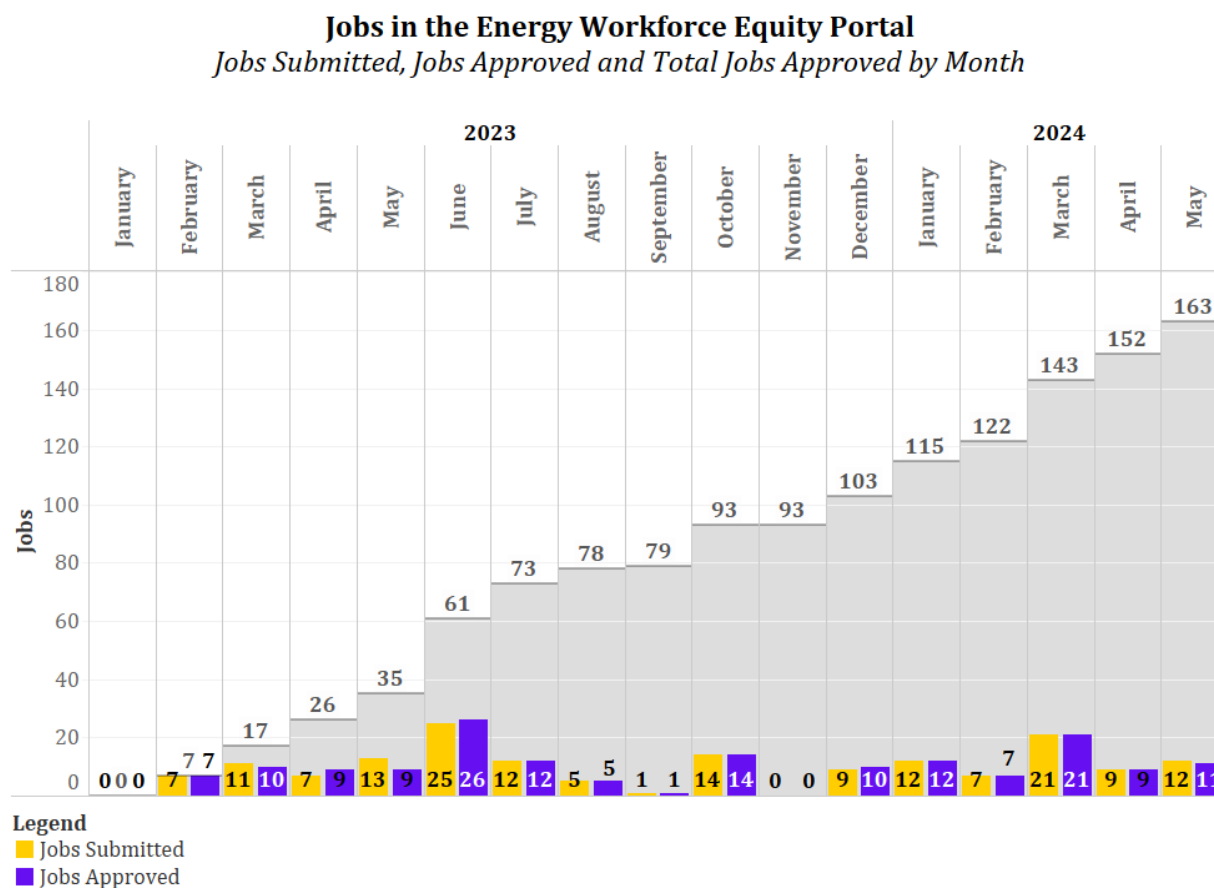


Source: Energy Workforce Equity Portal, Illinois Power Agency (January 31, 2023—May 31, 2024).

Since the launch of the Portal, there have been a total of 129 clean energy companies approved to participate on the Portal⁴⁷. Approval allows for the posting of job descriptions to connect with EEPs.

⁴⁷ As of August 5, 2024, there have been an additional 18 clean energy companies approved to participate on the Portal.

While 158 companies applied, 29 were denied due to a) inability to verify their company, b) duplicate applications, or c) an error in their submission. When additional information is needed, the Agency reaches out to the company to obtain the information.



Source: Diversity, Equity and Inclusion Bureau, Illinois Power Agency (May 2024)

Note: The reference line and shading represents the total jobs approved. In the month of June 2023, there were more Jobs Approved than Jobs Submitted due to an approval from the previous months submission.

Source: Energy Workforce Equity Portal, Illinois Power Agency (February 1, 2023—May 31, 2024).

Since the launch of the Equity Portal, 164 jobs have been submitted by clean energy companies and 163 jobs have been approved and posted on the Portal. Any jobs which were submitted but not posted were denied due to errors in their submissions. When additional information is required, the Agency reaches out to the company to obtain it. When a company is submitting a job posting, they are required to select a listing duration of 30, 60, or 90 days. In an effort to improve the user experience for EEPs, expired job postings are removed from the Portal. At the end of PY 2023-24, there were 53 non-expired jobs posted on the Portal. The jobs posted through the Portal represent a broad range of opportunities within the clean energy sector, providing EEPs with access to a variety of career paths. As the year progressed, the number of job postings fluctuated but experienced notable increases in the spring of 2024, coinciding with the growth in both EEP and company

applications. To increase this number, the Agency has been conducting targeted outreach to Clean Energy Companies registered on the Portal to encourage them to post new job opportunities. Furthermore, the Agency will be expanding its outreach efforts to small and emerging businesses to increase awareness of the Equity Portal.

5.3 Benefits and Challenges Identified by Equity Portal Users

The portal has received varied feedback from EEPs and other stakeholders, highlighting both the benefits and challenges experienced by users. The EAS Stakeholder Survey feedback indicates that 21% of EEPs have found increased job opportunities through the Equity Portal. Additionally, about 26% of EEPs have reported increased networking and job opportunities from potential employers. However, 53% of EEPs indicated that they have not yet experienced personal advantages from the portal. Common challenges include a lack of awareness about the Equity Portal's resources and the need for more job listings and training programs. Multiple EEPs expressed a desire for more information and regular updates on job and training opportunities in the clean energy sector.

Of the Illinois Shines non-EEC AVs and Designees that were surveyed, 79% were aware of the Equity Portal and 42% had used the resources provided. However, the same entities stated that only nine percent had posted jobs on the Equity Portal and only seven percent had recruited EEPs through the Portal. When asked why, the most common response was that they were not currently hiring for new roles.

5.4 Recommendations for Equity Portal Enhancements

The stakeholders surveyed and interviewed recommended several enhancements to improve the Portal's effectiveness. These include increasing the visibility of the portal through targeted outreach, providing more entry-level job listings, and sharing more career advancement trainings and resources.

Additionally, EEPs suggested improving the EEP approval notification process and providing an electronic EEP certification for easier verification and credibility with employers. Currently, the Illinois Shines program provides an EEC certificate to approved EECs, and the Agency is looking into developing a similar certificate for EEPs. Other recommendations for improving the resources on the Equity Portal include creating more detailed guides on entering and advancing in the clean energy sector and providing regular updates on industry trends and opportunities. EECs and other stakeholders have emphasized the need for more resources tailored to small and emerging businesses.

Feedback indicated a strong demand for resources that support business development and provide clear pathways for small and emerging businesses to thrive in the renewable energy market. As a result, the Agency has been working on the development of a Small and Emerging Business Hub, which will be launched in the coming months, to provide focused support and targeted resources in

a centralized manner for new and growing businesses to navigate the clean energy sector successfully.

By incorporating as many of these recommendations as possible and continuously improving the Portal, the Agency aims to ensure that it remains a vital tool for promoting equity and inclusion within Illinois' clean energy economy. The ongoing development and enhancement of the Portal reflects the Agency's commitment to addressing the needs of marginalized communities and supporting their full participation in the renewable energy sector.

6 Appendix A: Survey Results

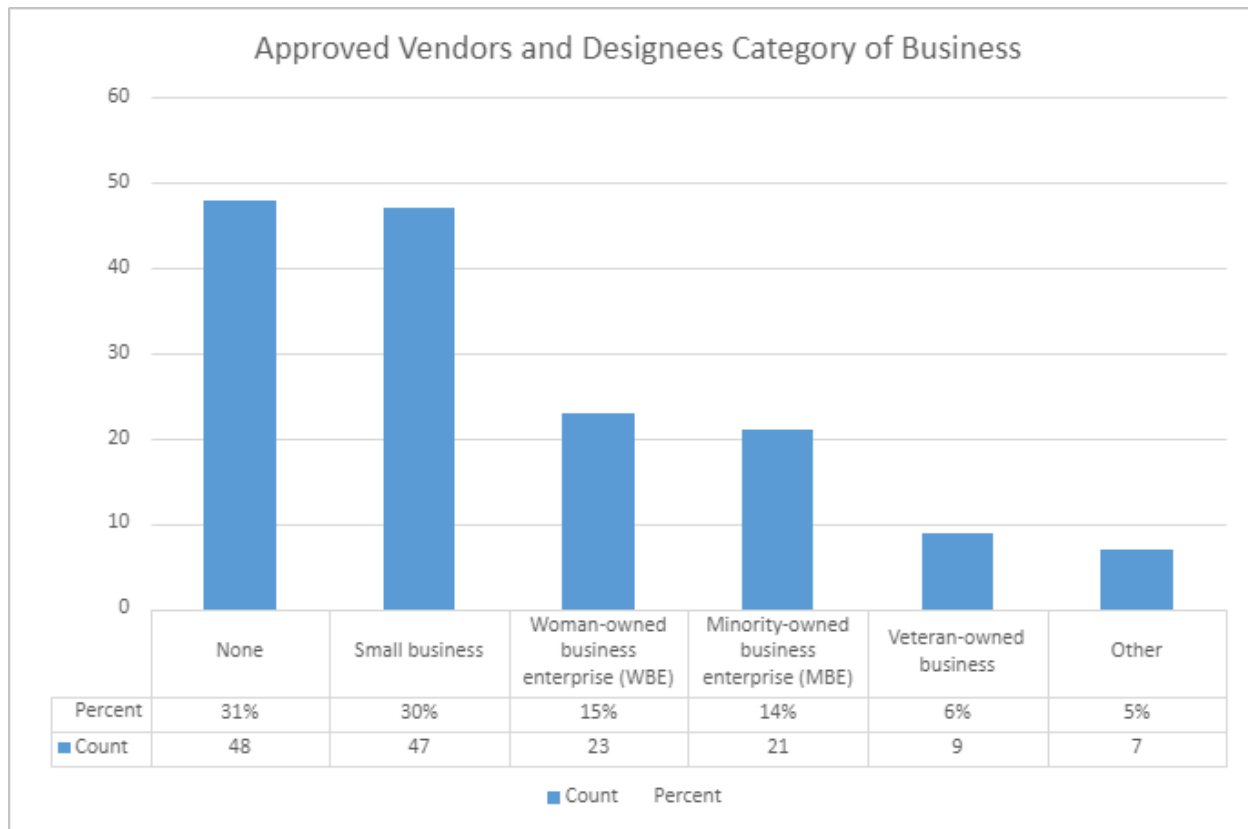
The Equity Accountability System (EAS) established under the Illinois Power Agency Act¹ aims to provide priority access to the clean energy economy for businesses and workers from historically marginalized communities. This system includes a Minimum Equity Standard requiring that at least 10% of the project workforce in certain renewable energy programs and procurements be comprised of Equity Eligible Persons (EEPs) or Equity Eligible Contractors (EECs).

In order to better measure the effectiveness of the Equity Accountability System and Minimum Equity Standard in increasing equity in Illinois' clean energy economy, a series of surveys was conducted to gather insights from community-based organizations and participating individuals. This appendix contains data, statistics, and responses from individuals classified as Equity Eligible Contractors (EECs), Approved Vendors and Designees (AVs and Designees), and Equity Eligible Persons (EEPs). In June 2024, four distinct surveys were distributed to these audiences. The IPA received back 25 completed surveys from approximately 400+ EEPs, nine from 70+ CBOs, nine from 70+ EEC AV/Designees, and 129 from 1,000+ non-EEC AV/Designees. While the completion rate was relatively low, the feedback received was insightful and revealed common themes across different audiences.

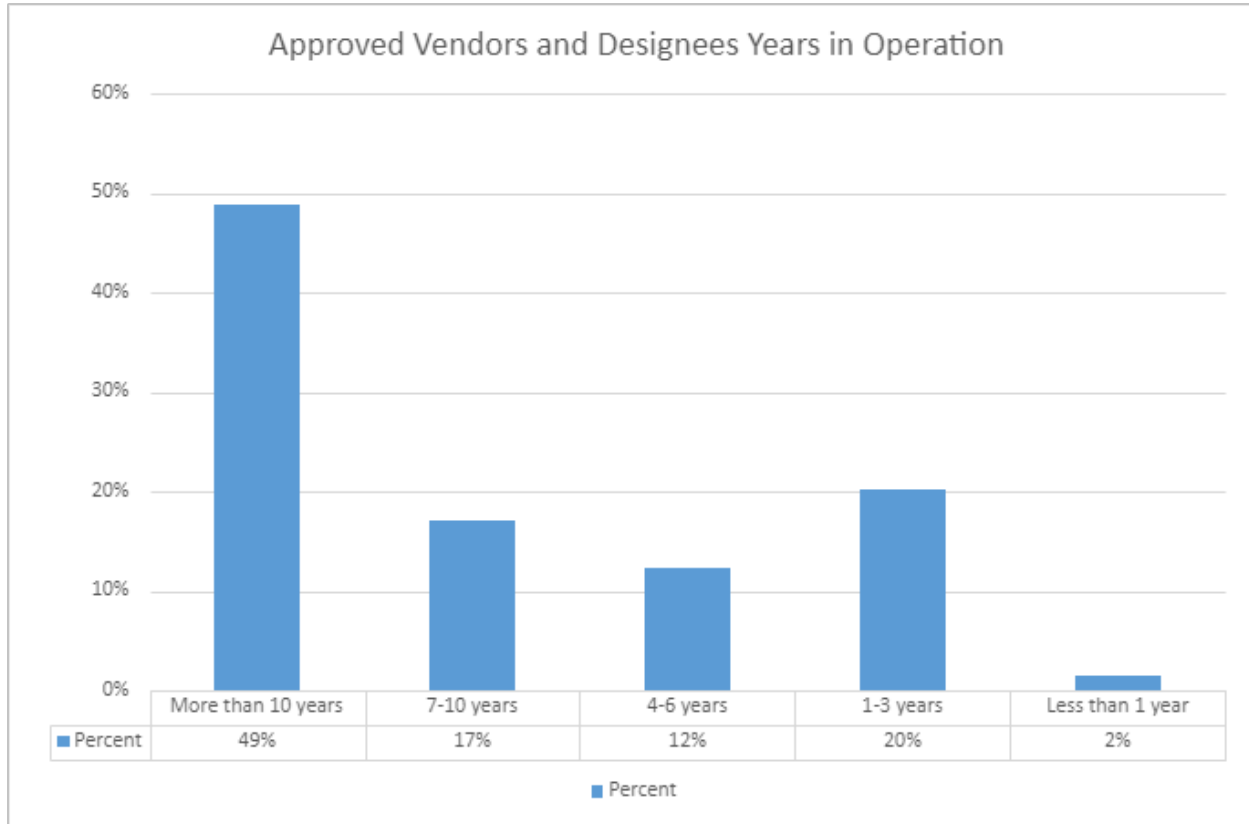
Analysis of Equity Eligible Contractors (EECs) Approved Vendors (AVs) and Designees Survey

Demographics

Categories that apply to your business:	Count	Percent
None	48	31%
Small business	47	30%
Woman-owned business enterprise (WBE)	23	15%
Minority-owned business enterprise (MBE)	21	14%
Veteran-owned business	9	6%
Corporation	1	1%
Government	1	1%
Just me	1	1%
LGBT-owned business enterprise (NGLCC)	1	1%
Part of an LLC	1	1%
Small business in the process of getting WBE	1	1%
ESOP	1	1%
Grand Total	155	100%



How many years has your company been in business	Percent
More than 10 years	49%
1-3 years	20%
7-10 years	17%
4-6 years	12%
Less than 1 year	2%



How many years has your company been involved in the clean energy industry?	Percent
More than 10 years	31%
1-3 years	29%
7-10 years	19%
4-6 years	19%
Less than 1 year	2%

In which region of Illinois does your company primarily operate? Select all that apply.	Count	Percent
Northern Illinois	137	61%
Central Illinois	54	24%
Southern Illinois	33	15%

Energy Workforce Equity Portal

Are you aware of the Energy Workforce Equity Portal and the resources it provides?	Percent
No	21%
Yes	79%

Have you directed your employees to register on the Energy Workforce Equity Portal?	Percent
No	67%
Yes	33%

Have you recruited Equity Eligible Persons through the Energy Workforce Equity Portal?	Percent
No	93%
Yes	7%

Have you posted jobs on the Clean Energy Job Listing Dashboard of the Energy Workforce Equity Portal?	Percent
No	91%
Yes	9%

Have you used any of the resources listed on the Resources page of the Energy Workforce Equity Portal?	Percent
No	58%
Yes	42%

If no, why not?	Count	Percent
Not Hiring in General	34	27%
No/few employees/subcontract relevant positions/new	23	18%
Unaware of Portal	16	13%
Compliant	11	9%
Not in IL	9	7%
Union shop	7	6%

No takers	6	5%
In progress	6	5%
Not what we're looking for	5	4%
Not a developer	5	4%
Difficulty using portal	4	3%
Not monitoring	1	1%

Minimum Equity Standard

Were you able to achieve the Minimum Equity Standard in the 2023-2024 Program Year?	Percent
No	30%
Yes	70%

If no, did you apply for and/or receive a Minimum Equity Standard waiver?	Count	Percent
No, did not apply for a waiver	51	40%
Yes, applied for and received a waiver	9	7%
Yes, applied for but did not receive a waiver	3	2%

What challenges, if any, did you encounter in meeting the Minimum Equity Standard?

"We have a very small workforce, and it is difficult to meet the standard and the questions that qualify an individual are very invasive and I don't feel that it is appropriate to ask someone if they have been incarcerated or if they were a part of the foster care program."

"It was very cumbersome to track. We didn't receive the official certification requirements until very late in the process."

"It's discrimination to other capable employees if I have to hire a certain employee to maintain the standard. We would never discriminate either way but if someone comes to join our team then I have to make sure I'm still within the 10% + minimum standard at least. We are a small business it's a big decision to bring on a new employee and if I have one candidate that is a hard worker, well trained already but doesn't fall within the MES then I have to pass them up for someone that does. I'm not saying the EEP isn't qualified but in say this scenario that person isn't the best candidate it will be hard to pass up a hard-working candidate for a sub par."

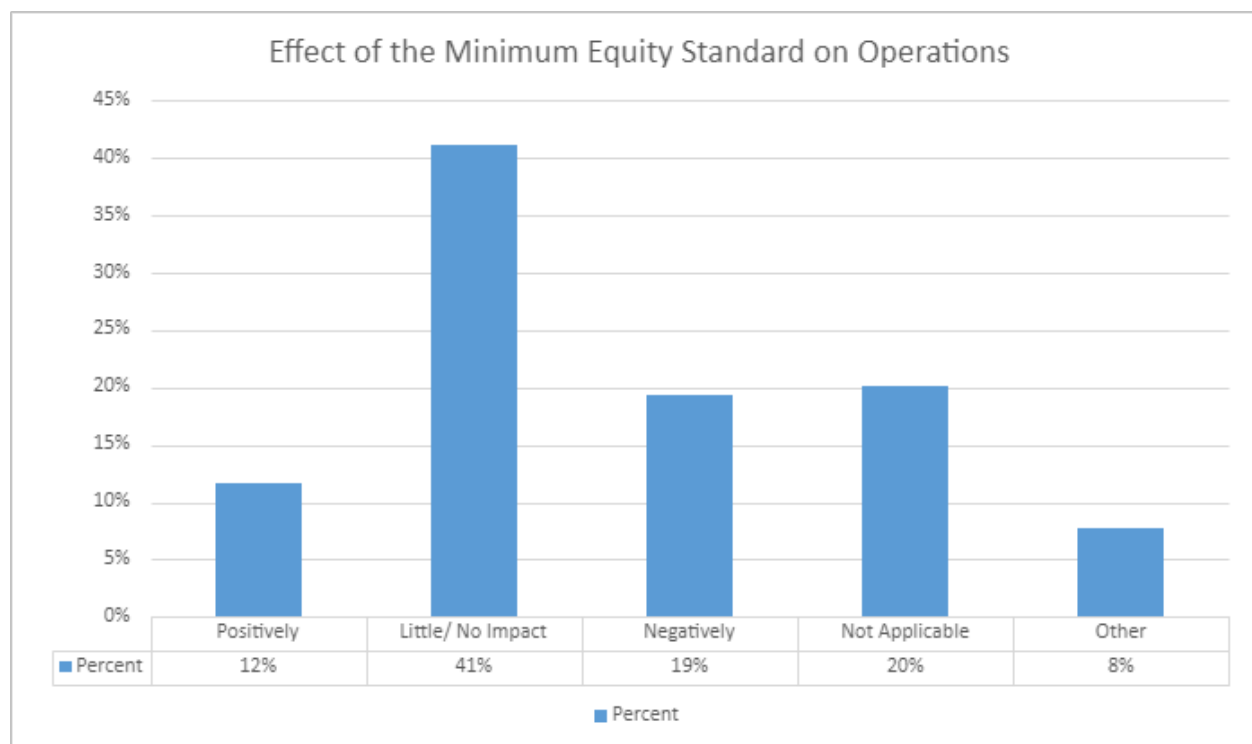
"We have very few employees and have had minimal hiring. When we have looked, we have not found qualified applicants. Because we did not hire, we did not qualify for the waiver. We also found out too late in the year that our labor partner, who could meet the MES, was going to submit their own report, therefore not allowing us to be included in their percentages."

"We are a full-service electrical company that does not concentrate all of our time to clean energy. We have been at the same size for many years and are very comfortable at that size. So we are not hiring on a consistent basis."

"While we did meet the required 10% EEP in our project workforce, we have encountered many challenges which are continuing to make progress difficult."

- There are a limited number of EEPs available in the rural areas in which we are typically building solar projects. There are many qualified EEPs based closer to cities who do not have the means to travel to the solar sites. The AVs providing rental cars is not a long-term sustainable option.*
- Certain professions which require many years of training count towards our project workforce (ex- engineering, legal). It is difficult to build a pipeline of EEPs in the short term for these types of roles.*
- It is common that subcontractors will not disclose the challenges that they face in finding and hiring EEPs, so the AV does not have full insight.*
- Trades which are not directly involved with building the projects are typically salaried workers which don't use prevailing wage.*
- There are challenges in determining which people from a subcontractor organization count in our project workforce. Every person who sets foot on site is counted, but there is confusion as to which office workers should be counted since we don't have direct visibility into all of the office work. Subcontractors would like to see a percentage of work done on the project in order to count, or something along those lines.*
- Unions have communicated that they will not ask members if they are EEPs and make any decisions based on this designation. It would be helpful if the IPA would have conversations with the unions. This could be particularly important for CDCS projects where union labor is required.*
- Some small subcontractor organizations do not have the manpower or capacity to seek out and hire EEPs considering their small workforce size. Some subcontractors do not want their EEPs to be publicly visible in the equity portal to limit other employment opportunities.*
- We don't want to house personal/sensitive certain information internally.*
- There is no database to find foster care alumni, since this is private information. It would be helpful to make a connection between agencies which work with foster care alumni who can make the EEPs aware of the program.*
- We are not able to connect with all Solar Training Program graduates since not every EEP is listed in the equity portal. More organized ways to connect these EEPs with AVs would be useful.*
- There is not a program in place to connect AVs with EEPs who are formally incarcerated. The program being developed by the Department of Commerce and Economic Opportunity is still not up and running after the 2021 bill passed."*

How did the Minimum Equity Standard impact your business operations?	Count	Percent
Positively	15	12%
Little/ No Impact	53	41%
Negatively	25	19%
Not Applicable	26	20%
Other	10	8%
Grand Total	129	100%



Negative Impact Statements

"Complying with MES has added significant costs in work hours, legal fees, tracking systems, and labor consultants. Lots of additional resources will continue to be necessary."

"The requirements imposed by MES limit our business's ability to grow. MES qualified employees in our area are limited, and our ability to grow our crew and install solar is therefore limited as well."

Positive Impact Statements

"It is enabling us to be more intentional with our subcontracting planning and hiring."

"It requires thoughtful consideration when reviewing applicants and our hope is that the program continues to be supported to drive candidates to this program. That would be the biggest risk is the availability of qualified talent is not there to support the MES requirements."

"It will only make us better and stronger with more skilled labor and a more diverse staff. While it is harder to maintain the reporting and the requirements with the state, I understand and see the value in making this part of the process."

Other Statements

"The MES is confusing and not clear on what requirements are needed for remotely operated teams that are not headquartered in IL. The impact on operations has been negative due to additional work required by the team to research how this standard applies to businesses that are not involved in the direct install/on-site work of a project. This standard needs to be very clearly documented for remote teams that are not based in IL."

"The entire process is very scary and was not thought through very well at the legislative level prior to implementing requirements. Although I 100% support giving graduates of training programs the opportunity to be hired first and appreciate that aspect, I cannot think of any other industry in the state that requires that those that were formerly incarcerated or from foster care be part of this pool and that we, as employers, are required to consider first and foremost. Again, if they are the best candidate for the job, then by all means they should be considered and hired. However, as with any business, the most qualified candidate that has the highest credentials and interviews the best, should be able to be selected for the open position by the employer. As a small business owner that has limited dollars to spend on employees, this is of the utmost importance. These requirements have made me decide to keep my business compliant by not adding more employees at this time."

Did you change your recruiting and/or hiring practices as a result of the Minimum Equity Standard?	Percent
No	72.09%
Yes	27.91%

If yes, how?	Count	Percent
Use Portal for Hiring	4	12%
Expanded Range of Hiring/ Other	6	18%
Greater focus on meeting MES Standards	12	36%
Job Fairs	3	9%
Negatively Impacted Hiring	8	24%

"We will be advertising and recruiting more employees because of the growth in Illinois, and will be targeting EEPs through social media, in-person career fairs, contacts with Union organizations, and posting jobs on the Portal."

"All of our subcontracting and hiring planning in Illinois is now centered around the EEP and MES requirements, which will lead to a more equitable workforce and will make us more deliberate about hiring across the board."

"We typically just have people walk into our office off the street and do not advertise or recruit for jobs at all. We have since had to participate in job/career fairs and post jobs online where in the past if we did need a few more people it was just word of mouth and people seeing us on job sites and contacting us that we have found all of our employees."

"We would have provided jobs to willing workers who were looking for work, but were unable to because they did not meet MES criteria. We therefore, could not expand our crew size, thus reducing the amount of clean energy construction we were able to accomplish. The MES had a negative affect on our desire to enrich people's lives through employment and through the introduction of clean energy systems to central Illinois residents."

Were there any challenges or patterns in locating and recruiting EEPs that you think the IPA should be aware of?	Count	Percent
No Issues	76	59%
Location Challenges	15	12%
Lack of Qualified Candidates/Training	11	9%
Union Issues	3	2%
Other	16	12%
General Challenges	8	6%

Location Challenges

"It is challenging to find EEP's willing to do the electrical install side of the work that are willing/able to travel or live in the area of the projects. To the majority of the people, you can get ahold of live in the Chicago area and can't/won't travel to the projects (all of ours are utility scale and typically remote areas). The people we have talked to at colleges have made the work seem below them now that they have the training and a lot want to get into more of the design/office side of clean energy."

"Our projects are located largely in more suburban or rural areas, though we have many partnerships within the City of Chicago. Transportation and travel are often an issue to get to different project sites. We need the CEJA job training programs to be stood up ASAP."

Lack of Qualified Candidates/Training

"Most who consider themselves qualified do not pass our level of standards we have set forth. Union electrical apprenticeships, and any other electrical programs should be required. not the programs set forth that are considered "qualified""

"The job training programs haven't been operational and don't aim to teach sales or data-driven skills, which is what we typically seek to hire."

General Challenges

"The MES is confusing and not clear on what requirements are needed for remotely operated teams that are not headquartered in IL. The impact on operations has been negative due to additional work required by the team to research how this standard applies to businesses that are not involved in the direct install/on-site work of a project. This standard needs to be very clearly documented for remote teams that are not based in IL."

"The program guidebook is so large it's hard to have a good picture."

"I think the general challenge is the fact that we cannot ask if someone qualifies as an EEP during the interview process, therefore we don't actually know if we are hiring EEPs until after they are onboarded. Unless, of course, they come directly from the Energy Portal but we have not had that happen yet."

"Most qualified staff are not aware of the need to meet these standards. It will take time for the workforce to be able to meet these standards, being able to apply for variances is very helpful so that in the event a staff member moves to other employment, it does not have an oversized effect on the end customer."

Do you believe that the Minimum Equity Standard has been successful in increasing opportunities for individuals who would otherwise be excluded?	Count	Percent
Yes	48	37%
No	33	26%
N/a	18	14%
Unknown/Other	30	23%

Yes

"Yes, MES allowed us to create a first of its kind fellowship program with City Colleges of Chicago, a program that we intend to scale across the state where viable. It has allowed us an opportunity to provide exposure and training to underserved and underrepresented populations interested in renewable energy career paths. We were also able to expand our internal workforce development program . . . to the state of IL hiring our first . . . team members the Spring of 2024. So, internally there has been significant improvement, but it has been very challenging to encourage the subcontractors to make necessary changes."

"Yes I believe it is keeping the issue more top of mind - it is just difficult sometimes for small companies in areas where few MES qualified candidates are found"

No

"No. We had already employed individuals prior to the MES requirements who happened to qualify. Our practices and culture already sought to include a diverse employees from historically excluded groups. Instead, MES added overhead, and additional non-value added administration."

"Not really. There needs to be more training of individuals who meet the requirements. Not just the hard skills for the energy industry - I'm speaking on how to present themselves at work and in an interview setting, mental health support, and more financial support from the state. They are expected to get a job in a high skill industry but they are barely able to make ends meet - rent, food, transportation."

Other

"Hard to tell if these individuals would have been excluded, we didn't even know we had equity eligible staff until we started collecting the data."

What support or resources could the IPA provide to improve your ability to meet the Minimum Equity Standard in future Program Years?	Count	Percent
Better information/communication	14	11%
Modifications to MES or Equity qualifiers	11	9%
Better trainings/resources	10	8%
Union Participation	4	3%
Better recruiting opportunities	7	5%
More accurate mapping/downstate inclusion	4	3%
Ease requirements for smaller businesses	6	5%
Other	5	4%
None	67	52%

Better Information

"More detailed project workforce definition as it applies to subcontractors."

Specific resources provided by the IPA to hand out to subcontractors.

Public lists of FEJA Job Training Program graduates.

Methods to connect AVs to foster care alumni and formerly incarcerated individuals.

The IPA to communicate with Unions on what they're doing to bring more EEPs into their Unions, and how they're tracking that."

Modification to MES

"I find that the IPA unfortunately is in a position where it is the enforcer of legislation. I have a great deal of respect for how the IPA has tried to implement the law, provide communication and training resources so businesses understand how to file the required reports, etc., but the IPA can't do anything about the Workforce Hubs being operational and turning out graduates. Nor can the IPA do anything about how you recruit formerly incarcerated persons and/or those from foster care. I believe the best thing the IPA could do is communicate the pitfalls of "putting the cart ahead of the horse" and asking that the legislation be amended to "legacy" those businesses that were operating prior to this legislation being passed. We are the reason the solar industry in Illinois exists . . . I've been battling for years to stay afloat and weather through a volatile industry, but that's no longer good enough. Now, that's not good enough and I almost feel forced to try to hire people that may or may not be the most qualified candidates for my employer dollars. Thank you to the IPA for all it has done/is still doing to gain stakeholder input and to implement processes/procedures that address that input. You are appreciated for that!"

Requirements for Small Business

"Grants to increase our workforce that are available to any ethnic group of people. We have felt discriminated against just because we are a small white working-class company that does not need to expand our workforce currently and does not have enough work or funds to pay another employee to do what our small company is already doing. We have one company that is the approved vendor and does not need to expand, because we have an electrical contracting company that is a designee of our approved vendor company that does all of the actual designing, selling, and installing of our projects. We are trying to grow the designee company and hire EEPs there as well, but our approved vendor company is only to complete the reporting of our systems and we don't really need to expand that part of the company. But we are having to try and meet the MES for both of our companies even though they really work as one company, just have 2 different names to keep the IL incentive paperwork separate from the design and installation company. We are a very small business in a rural community, and it has been very difficult to try and meet these standards. If we don't meet them, we will likely be put out of business. It appears as if the MES are trying to put the small companies out of business and only support the large companies that can hire as many employees as they want. If we can't meet these standards, our customers will lose their approved vendor on all of the projects we have installed and completed and monitor and maintain and be turned over to a large company where they will just be a number and no one will care when something goes wrong with their system and needs some repairs or software updates, or whatever needs to be done for them."

Final Thoughts

"Contractors would be more willing to do work in Illinois and hire EEPs to complete the work, if the process weren't so cumbersome. We will be hiring an additional employee whose only job will be to manage the MES compliance. It shouldn't be that burdensome on small businesses."

"Program administrators do a pretty good job of communicating with clarity. The motivation is sound but meeting the guidelines is a genuine challenge even for companies with the best intentions. We and others may very well currently employ more EEPs than we know. For example, an employee may not care to share their history of incarceration or their experience in the foster care system."

"It is becoming more and more difficult for small union shops to meet the standards that are set forth in all of the requirements. It seems unfair to push all of these regulations on them."

"Make the website easier to use by taking an eraser to many of the pages. Each page should have ONE call-to-action (or button to click) versus links pointing everywhere."

"I was going to apply for a grant, but I gave up because there was no application link - I spent 3 hours searching and just gave up."

"Your team has been helpful when we needed to reach out for help getting started. Thank you. MES and other workforce requirements seem to focus on the labor market, and companies with large amounts of employees. It is far more difficult to reach these standards for companies that do not participate in installation, or who have a small workforce in Illinois."

"The overall program is great for all involved and for what it is designed for, but it can be very confusing for employers as well. Many different terms used, dates, programs, etc. that it is confusing and gets to the point of being intimidating. Not sure it's possible, but the more you can always simplify the program and the process for all, the better it will be. Thank you for asking for our feedback, it is appreciated."

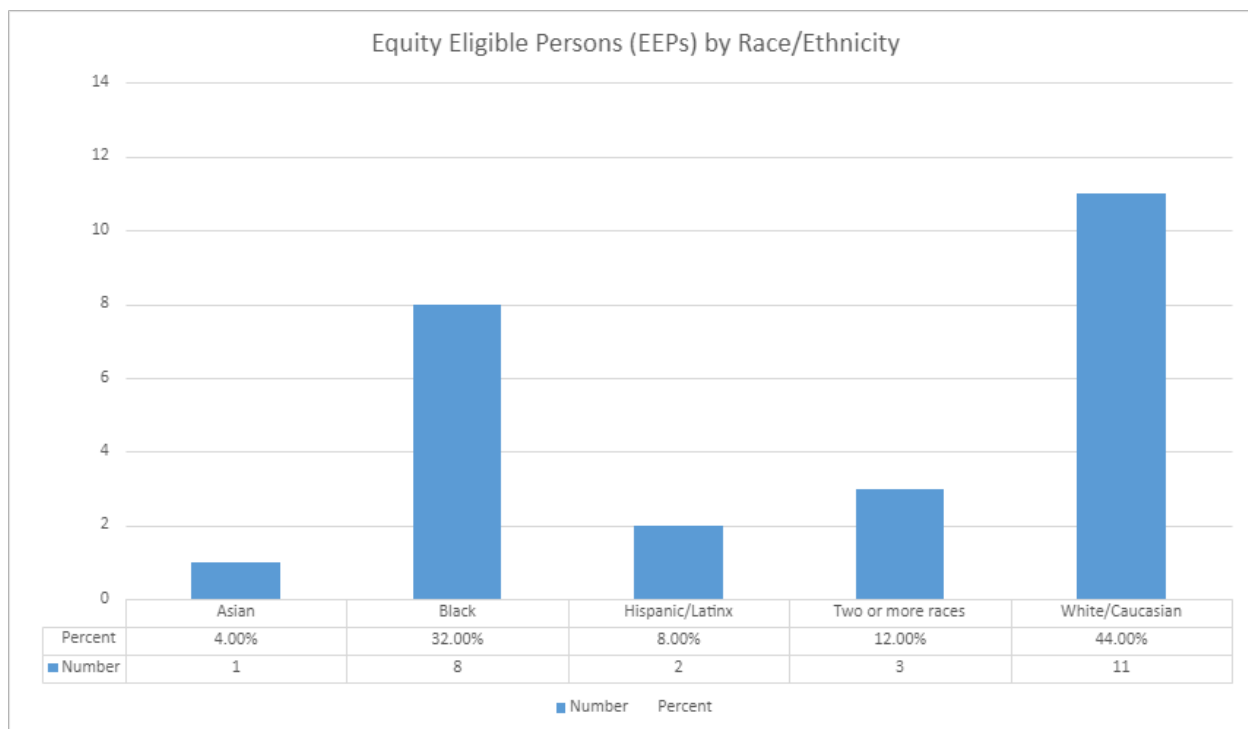
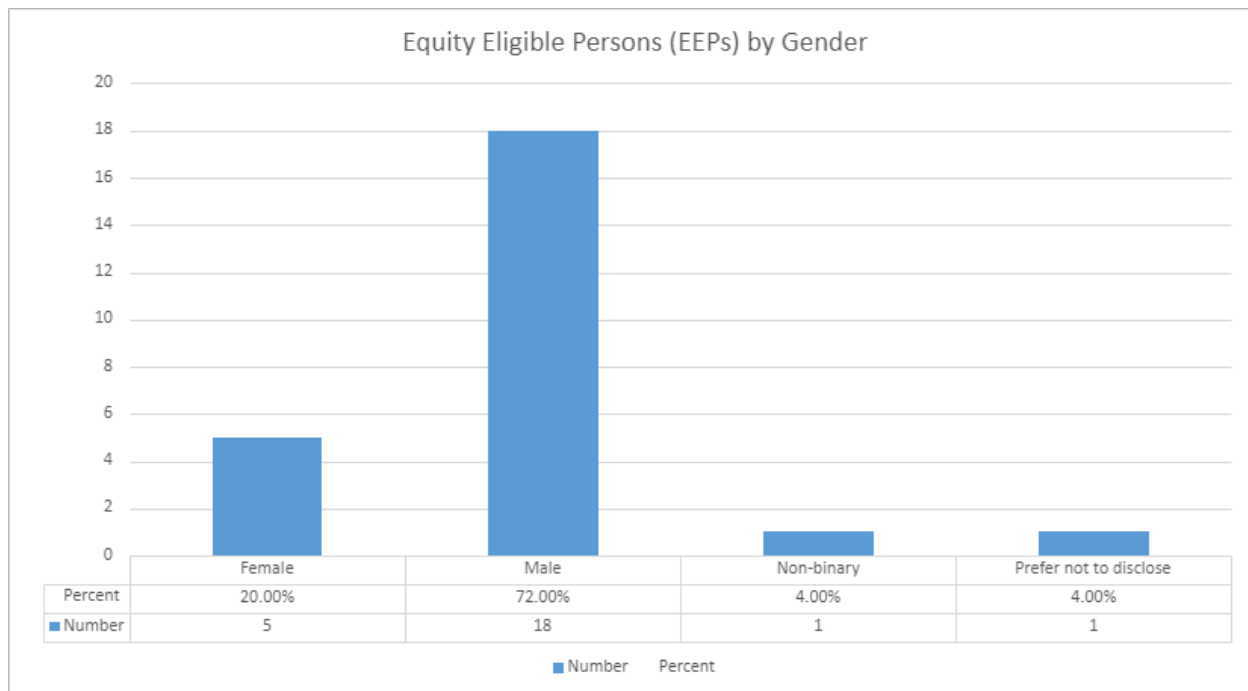
"It would be great if we received the surveys/year end report/compliance plans/forms all in PDF format that way we can internally respond to the questions instead of a Microsoft form where we can't save our in-process responses. Thanks!"

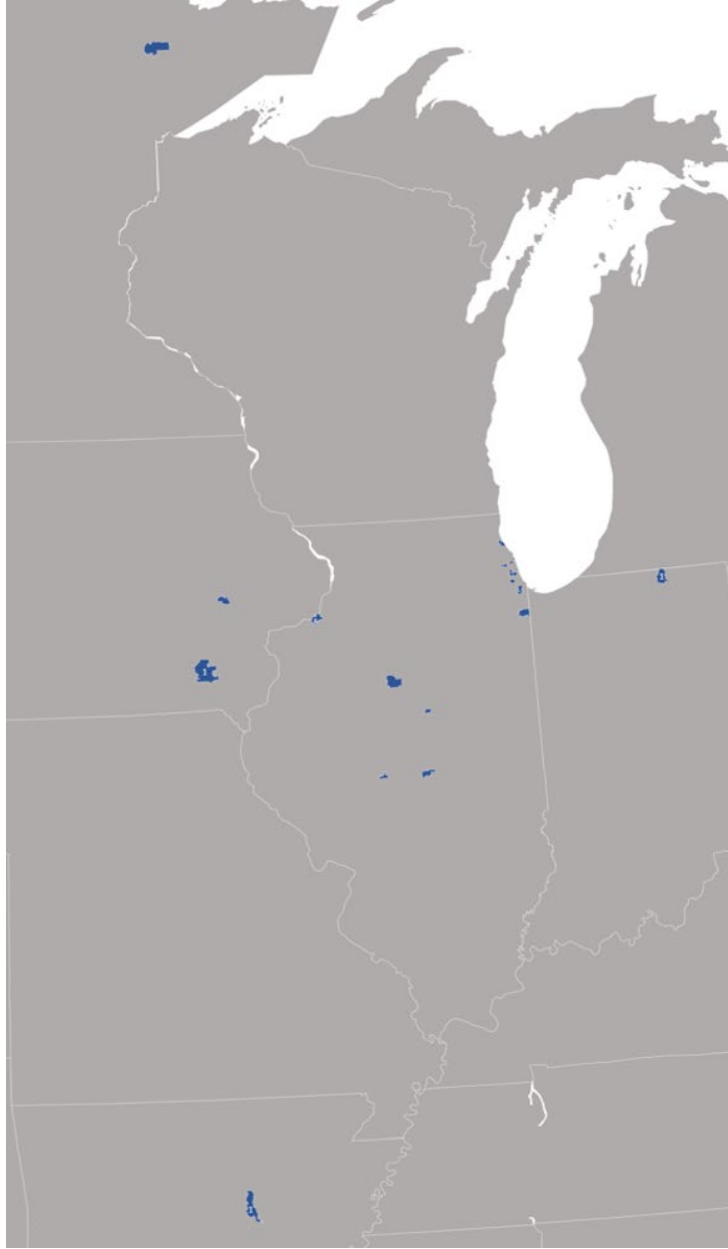
"Our company is very open to be involved in any conversations about improving MES program. A stakeholder group would be very useful."

Analysis of Equity Eligible Persons Survey

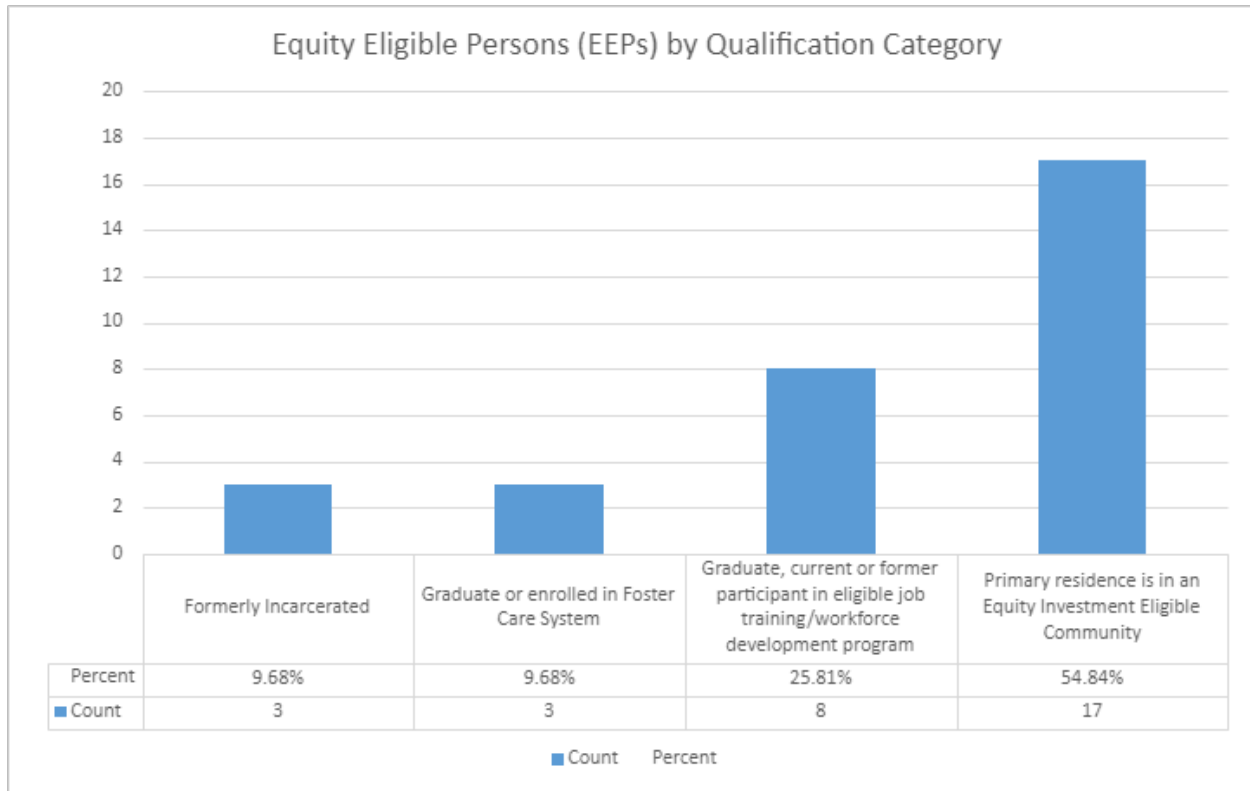
Demographic and Geographic Analysis

Respondents are overwhelmingly male, and trend white. Majority (76%) identify as either white or black. Majority (80%) are within Illinois. Majority (54%) qualify through residence in an Equity Investment Eligible Community.





State	Percent
Arkansas	4.00%
Illinois	80.00%
Indiana	4.00%
Iowa	8.00%
Minnesota	4.00%



Perspectives on EEP Program

Is current EEP enough?	Percent
No	24.00%
Yes	76.00%
Grand Total	100.00%

Women should be included	More/different qualifiers for EEP
Since everything in America is about race delineate Black, White and other. There only exist two races; black and White everything else is a mixture of the two. Especially in America	
I feel that the residence where an individual grew up should also be included in the definition for EEP since people would have experienced discrimination growing up but may have moved to a location that is not considered a primary residence in an equity investment eligible community makes it seem like that they have "overcome" discrimination when it can still impact their lives in ways other than where they live. As well, I am surprised that race/ethnicity is not considered a category since these a groups who have historically been impacted by discrimination in both subtle and overt ways.	
The EEP requirement for residency should ensure that the individual has lived in the EIEC community for at last 5 out of the previous 10 years.	
Providing more jobs to EEP's that are business owners. The majority of the clean energy development are going to those that are not EEP's or is not classified as EEP. Jobs are mainly going to those that are in the union especially in the cook county areas for example electricians not even carpenters. That has put the EEP's in a disadvantage position.	More benefits for EEPs
Exposure to the industry	
I feel it should be more discrete about it	Changes to EEP process

Received training/certification	Percent
No	52.00%
Yes	48.00%
Grand Total	100.00%

Specific improvements recommended	
Hands on the job train By has not been available historically	More resources provided for companies/orgs offering training/more variety of training
More job training on career paths outside of construction would be a good idea.	
A push for current employees to be encouraged to get skill development and job training and providing financial assistance to companies when employees are taking the training.	
I think we should be provide training for people who are eligible	
The resources are still redlined to people of color. Inequality still exist	More resources targeted at marginalized groups

I'm not aware of any job training resources, so really anything would be an improvement.	More clarity of what is and is not available
IdK	

Clean Energy Sector Participation

Currently Working in Clean Energy	Percent
No	28.00%
Yes	72.00%
Grand Total	100.00%

How did you first learn about the job opening that led to your current position?	Percent
City colleges of chicago	4.00%
Direct recruitment by the employer	28.00%
friend referred	4.00%
I founded the company	4.00%
I reached out to them after seeing a news article for a zoning case.	4.00%
Job listing on the Energy Workforce Equity Portal	8.00%
Online job board (e.g., Indeed, LinkedIn)	16.00%
Promotion	4.00%
Referral from a community-based organization or workforce development program	20.00%
Worked my way up	4.00%
Working in the solar industry	4.00%
Grand Total	100.00%

Positive/Negative Experience	Percent
Lack of opportunity/discrimination	20%
System needs changes	10%
Increased attention from companies	30%
Little/no change, Other	40%
Total	100%

Please describe any specific positive or negative aspects of your recruitment/hiring experience with employers attempting to meet the Minimum Equity Standard. For example, did you observe an incre...	Positive/Negative Experience
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Have not received any employment as of yet	Lack of opportunity/discrimination
Still can't find a clean energy job that provides an adequate wage	
As a black employee with more experience and electrical hours. I am paid less than my white counterparts with less experience. I'm expected to lead and teach these "white privileged shadows" that make more money than I do	
Biases	
Employers trying trying to meet the MES standard do have a hard time obtaining all necessary info because of the sensitive nature of the subject at hand. I think EEPs should not need to disclose how they qualify as EEPs to their employers, but only display a confirmation email from Energy Equity Workforce Portal with their name on it.	System needs changes
I registered as an EEP per my employer's request. I have not gone through a hiring/interviewing process since registering as an EEP. However, I do feel like my employer should be able to independently verify with the IPA that I have registered as an EEP. I made my submission private and so they apparently have no way of verifying.	
My certification with solar helped me the most in securing my employment and later on when I learned more about the MES and EEPs, I searched my residence and found that I was eligible. My involvement in many other projects has given me a wonderful experience and opportunity.	Increased attention from companies
Increased interest due to my EEP status	
My employer was thrilled. I have been contacted by other out of state companies looking to raise their MES numbers	
I noticed higher interest in recruiting EEPs	
My status was not discovered until after I was hired (before registering). I have received a couple of recruitment calls since registering as an EEP.	
Increase I'm company hiring minority people	
I was initially interested in working in the solar industry with Hoosierland excavating by chance meeting with the owner, who I had met decades ago while in foster care in the state of Indiana as a 9 yr old.	Little/no change, Other
I joined to hopefully help my employer get more work in Illinois	
My employer just recently asked me about my EEP status. I wanted a higher position as a project engineer. I was offered the position months ago but have not been officially started in the position as of yet. Several others have been promoted but no mention of my promotion. In other words, they are not interested in promoting me it was just all fluff	
I was already employed at the company and enrolled with them	
Confusing	
I have only been contacted by one company	

I've experienced no discrimination against me in my pursuit of reaching higher in the solar industry. In fact my history has been a benefit.	
Ideal Energy Inc. is actively trying to meet all requirements of EEP standards	

Energy Workforce Equity Portal

Did you certify as an EEP through the in the Energy Workforce Equity Portal?	Percent
No	12.00%
Yes	88.00%
Grand Total	100.00%

Advantages	Percent
No advantage	53%
Training Resources	5%
Increased job opportunities	21%
Networking opportunities	5%
Other	16%
Total	100%

If yes, what advantages, if any, have you found of being certified as an EEP in the Energy Workforce Equity Portal?	
None so far	No advantage
None	
None	
I have not noticed any.	
None as of yet	
None yet	
I am not aware of any personal advantages, but would like to know of any that are offered	
None	
None	
None	

19!weeks of study and certification in clean energy	Training resources
Other companies have reached out, two since January.	Increased job opportunities
I have gotten recruitment calls, but haven't responded because I am not currently looking	
Job listings that are focused on EEP recruitment	
Opens you to more chances of getting a job	
Communication with other minority within Solar industry	Networking opportunities
I haven't had the opportunity to visit the website	Other
I can be included in MES reports.	
It was an easy to use portal	

Resources

Have you used any of the resources listed on the Resources page of the energy Workforce Equity Portal?	Percent
No	56.00%
Yes	44.00%

If yes, which resources did you use? Select all that apply.	Percent
Become an Equity Eligible Contractor	52%
Equity Eligible Contractor Lists	3%
Equity Investment Eligible Community Map	15%
FEJA and CEJA Workforce Trainings	9%
Grants and Funding Opportunities	3%
Minimum Equity Standard	12%
Other Education and Trainings	6%
Total Responses	33

What improvements or changes would you recommend to enhance the effectiveness of the Energy Workforce Equity Portal in supporting EEPs' access the clean energy economy?	
Equality	Equity/ Equality concerns
Equality needs more attention. Some of these companies are getting away with blatant racism and inequality	

Increase opportunities for entry level persons	Job opportunities
Make minorities who speak two languages a priority hire	
I would like to see individuals like myself hired to speak in my community to show people with similar lived experiences the route to a different life and how to earn new and beneficial skills	
More job listings	
Clarity	Improved Information
More publicity via media and billboards	
Continue doing what you are doing. Also give information for those who would like to further their career in the clean energy industry.	
More people need to know about the EEP	
Probably a name linked with the confirmation Smartsheet emails received once EEP status is approved.	Changes to EEP notification
I would recommend that current employers be able to verify their employees that have registered as EEPs.	
Giving EEPs that have not signed up for the portal yet to still be seen by registered vendors.	
Its a good start, just continue to add features and improvements	None/Other
Get the listed programs up and running. I would recruit into them.	
Not really anything	
To new to the program to answer	
I need to get more involved before I can answer	
I am in the process of studying that portal	
I personally am not the person in our organization that does that	
No suggestions	

What improvements or changes would you recommend?	Percent
Changes to EEP notification	14%
Equity/Equality concerns	10%
Improved Information	19%
Job opportunities	19%
None/Other	38%

Equity Accountability System

Have you observed any changes in opportunities for participation in the clean energy economy since the implementation of the Equity Accountability System (June 1, 2023)?	Percent
No	76.00%
Yes	24.00%
Grand Total	100.00%

What barriers or challenges, if any, have you encountered in accessing or participating in the clean energy economy?	Percent
Challenging environment	13%
Inequality/discrimination	21%
Monetary concerns	8%
None	38%
Other	8%
Work difficulties	13%

What barriers or challenges, if any, have you encountered in accessing or participating in the clean energy economy?	
Inequality	Inequality/ discrimination
Pay discrimination.	
I have experienced gender-based discrimination at previous employers in the industry	
Still racial disparities	
Harder to get into the clean energy economy as low income and marginalized group	
None	None
None	
None	
None	
None yet	
Not aware of any	
N/a	
N/A	
I've had a seamless ride so far that's shaping up to be much better in the future.	
It's a very complex system, and the sector is split at every corner when it comes to knowledge of systems so far as I have seen. In order to succeed you have to be constantly learning and challenging yourself while remaining safe in your	Challenging environment

procedures. Even over a year in, the amount I don't know is baffling, but I strive to learn it all.	
It can feel like if you did not study clean energy in college, you would need a recommendation to get into the industry.	
The challenges are getting information on manufactures concerning solar panels. How can someone that want to start a small business get information on creating a company to start installing solar panels on commercial buildings.	
Inflation	Monetary concerns
access to capital in early years is always a challenge	
Not many companies reach out to you	Work difficulties
An actual job placement. I have had to research and stay on top of things myself.	
Travel for work	
Installing projects in the EEC Block. As an EEC AV, our submitted projects should remain in the hands of EECs. Most times, non-union contractors will install our EEC Block projects for a lower price, however, this is not what we want or need. As an EEC, we would like to stay physically connected to each of our EEC Block project regarding installation for more opportunity.	Other
Lack of clarity on returns using BESS	

What improvements or changes would you recommend to enhance the effectiveness of the Equity Accountability System in promoting participation of Equity Eligible Persons?	Percent
Outreach/communication	29%
Increased equity focus	17%
Training/Mentorship	13%
None/NA	38%
Other	4%

What improvements or changes would you recommend to enhance the effectiveness of the Equity Accountability System in promoting participation of Equity Eligible Persons?	
Hire individuals who have two or more of the qualifications to become an EEP to speak to others who qualify about the programs available to help. Hire Me.	Outreach/ communication
Community outreach	
Media coverages	
More emails events	
Representatives	

Increased communication, even if there are no jobs available.	
Encourage energy employers to talk to employees about the opportunity	
Mandate fair wage and hurting practices	Increased equity focus
Equality for all	
Make dual language speakers top priority as well minorities	
Ensure that those that are going to school are really EEP Eligible. Some are becoming EEP eligible by sending the higher income earners to school so that they can qualify for the EEP program through certain companies. I am just make you aware of what they are doing in the clean energy sector.	
Teaching more about the systems and how they actually work, past the basics. Even my NABCEP associates meant close to nothing with all of the complexity in the system that they do not teach you about. If people understand what they are building and why it is important, then you'll have more participation. Or just a DIY class so they can go off-grid safely and then they'll be energy independent and have the skills to succeed in the workforce.	Training/ Mentorship
expansion of mentorship programs that are underway	
More robust job training programs that teach a variety of in-demand skill sets.	
None yet	None/NA
N/A	
N/A	
N/A	
None yet	
N/a	
None	
I don't know	
I have not used it	
Installing projects in the EEC Block. As an EEC AV, our submitted projects should remain in the hands of EECs. Most times, non-union contractors will install our EEC Block projects for a lower price, however, this is not what we want or need. As an EEC, we would like to stay physically connected to each of our EEC Block project regarding installation for more opportunity.	Other

Final Thoughts/recommendations

Is there anything else you would like to share about your experience with the clean energy economy or the Equity Accountability System?

"It has been a VERY slow start up process. Most people coming out did not have a place or job to go to and had to return to old job to pay the bills. The hurry up and wait scenario does not pay the bills."

"Happy to get updates and ideas sent to my email from the company."

"I am pleased that you have put a program in place to help those that don't receive the same benefits or treatment as others but please be aware that some companies are avoiding higher those that are black by putting those in place that qualify by going to school or taking a class to qualify as a EEP."

"Economy wise I understand, the system works against unions unfortunately though and construction contractors and especially the electrical unions depend on each other."

"Assistance/training with learning to use the system for individuals who qualify for to be EEP/EEC would be helpful."

Is there anything else you would like to share about how the state can improve its efforts to ensure equitable access and participation of EEPs in the clean energy economy?

"I would say that without transportation assistance, it can be very difficult to participate in more rural areas."

"Go to High Schools and recruit talent."

"Hiring some people like myself to reach into our communities would bring more people into the program and training clauses."

"Better incentives, offer a DIY solar storage and battery backup class for going off grid."

"Installing projects in the EEC Block. As an EEC AV, our submitted projects should remain in the hands of EECs. Most times, non-union contractors will install our EEC Block projects for a lower price, however, this is not what we want or need. As an EEC, we would like to stay physically connected to each of our EEC Block project regarding installation for more opportunity."

"Punish those that discriminate in job and wage."

"Yes, please ensure that the present and future EEP's are those who really qualify as EEP not those who are just going to school so that their company can get a kickback from higher a EEP from the qualifications for instance one of the qualifications is that you have gone to school concerning the clean energy sector. They should go through a work force program in order to qualify as an EEP."

7 Appendix B: Interview & Roundtable Results

EEP Interviews

The IPA gained valuable insights from two interviews with two EEPs, conducted in July 2024. One respondent shared that other EEPs have heard of more career opportunities because of their EEP designation, and that registered EEPs are in high demand from companies due to CEJA incentives. The interviewee stressed that, for low income or marginalized Illinoisans, EEP registration provides more opportunities and a chance to compete on a more level playing field in a fast-growing industry. However, another interviewee reported a lack of interest from companies, possibly due to skill and experience mismatches between EEPs and company preferences. The interviewee stressed the need for firms that benefit from CEJA programs to hire workers from inside Illinois.

One interviewee highlighted the need for more training and skill development opportunities for EEPs, and for those opportunities to be better communicated to EEPs. The interviewee suggested the creation of a dedicated website to showcase these clean energy sector-specific training opportunities, more frequent updates from the Equity Portal regarding job and training opportunities, and an electronic version of training certificates. Another interviewee concurred, and expressed hope that state agencies would conduct more outreach about EEP designation in underrepresented communities (focusing on high schools and colleges). The interviewee also suggested that state agencies should partner with clean energy companies to create fellowships and training programs for EEPs.

Both interviewees expressed overall satisfaction with the current definition of an EEP. One interviewee called for increased representation of women and Latinos in the sector, and advocated an expanded definition to specifically include both groups. Another interviewee suggested that the definition incorporate multiple degrees or levels of classification to more thoroughly categorize how some areas are more disadvantaged than others.

One interviewee reporting feeling hopeful about their future within the clean energy industry, and for EEPs in the sector. Another interviewee reported concern about the possibility of clean energy companies skirting the intent of the MES and stressed that state agencies need to enforce the MES to ensure Illinoisans of color are connected with clean energy opportunities.

EEC Roundtable

In May 2023, the Illinois Shines third-party Program Administrator, Energy Solutions, held a series of Equity Eligible Contractor Approved Vendor Roundtables. These Roundtables explored AVs' ongoing issues and needs, and participants provided valuable feedback to the IPA.

Regarding project financing, AVs shared that posting 5% collateral upfront is often impractical for emerging small businesses and indicated that more resources and funding guidance—particularly with the Advance of Capital process—is needed. AVs also shared that not being able to edit or duplicate disclosure forms significantly increases the administrative burden on Vendors and customers. Participants showed support for introduction of an automatic notification feature to let

them know when a Disclosure Form is signed. Regarding overall support resources, AVs showed enthusiastic interest in creating a Mentorship Program to connect new businesses with existing developers, as well as new partnerships to facilitate connections and collaboration between AVs. The participants requested support resources from the IPA in the form of process guides and recorded webinars to aid navigation of programs like Illinois Shines.

Since the conclusion of the roundtables, the IPA and Energy Solutions have made progress on addressing this feedback to ensure Illinois Shines works well for all stakeholders. To address concerns regarding project funding, Illinois Shines has published an Advance of Capital scoring rubric and developed a template for AVs to use when submitting an Advance of Capital Request. Energy Solutions developed a Mentorship Pilot, which has completed its first cohort and is currently expanding into an annual offering. Cohort participants received valuable presentations on the Illinois Shines project lifecycle and REC contracting procedures. In the coming year, the program will include greater opportunities for participants to learn best practices from established AVs. Energy Solutions has also developed a series of informational “one-pagers” to supplement existing resources on the Illinois Shines website. These documents are scheduled for release early in the upcoming Program Year. The IPA looks forward to continued work with AVs and stakeholders to improve the program experience.

EEC Interviews

Across June and July 2024, the IPA conducted interviews with 5 EECs. These interviews explored EECs’ ongoing issues and needs, and participants provided valuable feedback to the IPA.

One respondent stated that businesses need predictability to operate long-term projects, and that restrictions on EEC income create limits on the operations the firms can undertake. The respondent expressed concerns about larger companies acting in bad faith to take advantage of the EEC category and hopes IPA will protect against this. The respondent also expressed a need for more stringent industry safety standards.

One respondent highlighted the increasing popularity of the trades among young people and suggested that the IPA should use this opportunity to create an apprenticeship program pipeline to draw recent high school graduates to the clean energy trades. The respondent suggested including returning veterans in the program as well.

Another respondent suggested broadening the definition of EECs, and creating an EEP committee to study whether some EEPs can feasibly self-designate (akin to the ILSFA EJC Self Designation Committee). The respondent also suggested that MWBEs should not have an income qualification.

One respondent asked the IPA to be more explicit about pathways to different business models.

Another respondent touched on the need for program guardrails to ensure EECs are able to partner with larger firms as part of their business operations but are not used as “sleeves” for larger companies.

Another respondent highlighted the importance of regular EEC forums to hear feedback. The participant also suggested reducing fees on projects being developed in EIEC areas.

Another respondent informed the IPA that they are focusing on construction jobs to meet the MES for projects. The respondent stressed that state programs need to include “in-between” employees beyond company leadership and laborers to ensure more pathways to well-paying careers are open.

Community-Based Organization Interviews

To gauge the direct and indirect impacts of the Equity Accountability System, the IPA conducted a series of interviews with six Community-Based Organizations (CBOs), primarily workforce development nonprofits involved in the clean energy sector. These interviews took place in June and July 2024.

Participants shared candid feedback on the EAS’s effectiveness in increasing opportunities for EEPs and EECs in the clean energy sector. Multiple interviewees stated that it is too early to tell whether the EAS is achieving its aims and highlighted the need for increased communication and knowledge sharing from the IPA regarding CEJA workforce programs. One participant reported that employers have been hesitant to hire EEPs without work experience, and that employers are generally unwilling to provide on-the-job training or candidate development.

Another participant observed that the training programs that they interact with are saying they can’t place participants, while employers are planning to request waivers since they can’t find qualified EEPs. The respondent pointed out that these observations point to a disconnect between employers, EEPs, and training programs (CBOs). Multiple respondents requested greater coordination with relevant unions to develop a skilled workforce, and to include EEP placement in this focus.

When asked about the most significant barriers faced by EEPs and EECs in accessing and participating in the clean energy economy, interviewees touched on similar themes—namely, access to capital, a lack of jobs and projects available, and long delays with implementing CEJA programs. One interviewee suggested more frequent, informal feedback processes for state agencies to directly communicate with EECs and EEPs.

Interviewees had mixed feelings about the current EEP and EEC definitions’ accuracy. One respondent noted that privacy concerns regarding former incarceration or foster care status can hold back individuals from registering as EEPs. The respondent requested greater transparency from the Equity Portal regarding where and how personal information is shared. Two interviewees requested the addition of gender into the definition, and one also requested the addition of race and ethnicity. One respondent noted that using a geographic definition—through the existing EIEC areas—works well because it captures all disenfranchised communities within that area.

Overall, interviewees reported seeing positive changes in employment and business opportunities in their communities due to IPA programs. Respondents noted an increase in employer engagement and a significant increase in new job trainings, while cautioning that these trainings need to be connected to job placement and retention outcomes. One respondent requested that state agencies ensure companies do not engage in the hiring of EEPs simply to fill their requirements and then let the EEPs go shortly after. Another respondent asked for more IPA webinars and presentations targeted to CBOs, highlighting existing programs.

The interviewees gave several general suggestions in closing. One respondent suggested creating different types of certification for EECs based on their particular skill set. Another highlighted the

need for state agencies to assess developers' good faith efforts to hire EEPs and EECs if the developer is granted an MES waiver. Another interviewee requested that the state use its authority to mandate contractors change their hiring practices, to require that a certain percentage of individuals hired should be first time energy workers and a certain percentage should be displaced energy workers.

Clean Energy Company Interview

In July 2024, IPA staff also interviewed the owners of non-EEC minority-owned clean energy company that participates in both Illinois Solar for All and Illinois Shines.

The owner pointed out one challenge with the programs' workforce development provisions: companies must meet a requirement for hiring job trainees, but only workers who were trainees before being hired are counted. A change to this definition to include company sponsorship of trainees would encourage firms to invest in employees' growth and career development.

Since the implementation of the EAS, the owner has noticed increased opportunities for EECs but warns against overly burdensome compliance requirements. In particular, the owner noted that restrictions of Advance of Capital, which are meant to prevent abuse by non-EECs, sometimes prevent EECs themselves from accessing the funds. The interviewee suggested giving EECs part of the value of the RECs they produce upfront to ease cash flow challenges.

The owner praised the current program administrator, emphasizing that financial constraints, along with the ongoing lack of CEJA-mandated job training programs, are the biggest challenge to EECs. The owner emphasized that companies have been counting on the CEJA-mandated job training programs to provide qualified workers, especially EEPs, and that the delays in program setup have been causing great challenges in the field. Noting that "the engine that is supposed to be pushing out qualified candidates is not working," the owner suggested greater support for finding EEPs who qualify based on other criteria than training program participation. The owner also stressed that state-run programs should focus more on developing workers past entry-level positions and manual labor and suggested offering 50% of EEC benefits to WMBE businesses to broaden the program's reach.