

Breakthroughs in Equity and Energy in Illinois

Laura Goldberg, Natural Resources Defense Council

Anne McKibbin, Elevate Energy

ABSTRACT

Illinois' breakthrough energy legislation, the Future Energy Jobs Act ("FEJA" or "the Act"), contains several provisions aimed at correcting historical underinvestment in energy efficiency in Illinois' environmental justice and economically disadvantaged communities. In the process of passing the Act, Illinois advocates gained valuable insights on building a more inclusive and equitable advocacy coalition. As FEJA is implemented at regulatory agencies and in the field, Illinois advocates continue learning to work together to promote equity and inclusion. Advocates are also working to ensure that the promise of the Act's policy translates into effective efficiency and solar programs and workforce development that brings benefits to all communities in Illinois, especially among those who need them most.

This paper will discuss the coalition that was built to pass FEJA and lessons learned in that process, FEJA provisions that are already dramatically increasing investment in energy efficiency in Illinois' environmental justice and economically disadvantaged communities, and ongoing implementation issues being addressed by advocates to ensure that FEJA lives up to its promise. The paper weaves in stories about how organizations in environmental justice and economically disadvantaged communities are amplifying their voices within the Illinois coalition to ensure that Illinois' clean energy future properly includes and reflects the needs of the people within those communities.

Introduction

The Future Energy Jobs Act (Public Act 99-906), referred to as "FEJA" or "the Act," is considered one of the most significant pieces of energy legislation to pass in Illinois. The bill was sponsored by both democratic and republican leadership, moved forward with bipartisan support through a democratic house and senate, and was eventually signed into law in December 2016 by Republican Governor Bruce Rauner. Passage of this Act places Illinois among the leading states for clean energy.

The Act includes three clean energy components: (1) energy efficiency, (2) renewable energy, and (3) a zero emissions standard. The Act also includes workforce development provisions and will boost the state's economy by bringing additional private investment to Illinois, which in turn will create tens of thousands of new jobs (ICJC 2016).

The Act also has strong low-income components, such as specific carve-outs for low-income energy efficiency which double the required utility investment in low-income energy efficiency programs to at least \$25 million for ComEd and \$8.35 million for Ameren Illinois (Public Act 99-906, Sec. 8-103B(c)).¹ It also creates a dedicated low-income solar program, called Solar for All, which includes job creation and training components specific to Illinois' underserved communities (Public Act 99-906, Sec.1-56).

¹ The Act's provisions are framed in terms of 'low-income' households, defined as those with incomes of less than 80% of area median income. The Coalition organizations and communities themselves, however, prefer the following terms, as appropriate: economically disadvantaged, underserved, and environmental justice.

The Act was passed with the collaboration of a diverse coalition of partners that worked together for over two years, the Illinois Clean Jobs Coalition (the coalition). The coalition is composed of Illinois businesses, environmental organizations, consumer advocates, advocates for economically disadvantaged communities, environmental justice organizations, and representatives from faith communities. Communities that have been disproportionately negatively impacted by pollution and climate change have historically not been included in policy decision-making processes, even for policies that are intended to benefit the people in those communities. The environmental movement at large has always struggled with broader diversity, equity, and inclusion issues (Taylor 2014).² But the movement is making progress, and the inclusion of economically disadvantaged and environmental justice community groups in the coalition has begun an important shift in how energy-related decisions are made in Illinois and by whom.

This paper will go into additional detail on these aspects of the Act:

- (1) The diverse coalition built to pass FEJA and the lessons learned in that process. This section will highlight the organizations that work within and represent Illinois' economically disadvantaged and environmental justice communities,
- (2) The energy efficiency provisions in FEJA, including those that are already dramatically increasing investment in low-income energy efficiency,
- (3) The ongoing implementation issues being addressed by advocates, with an emphasis on the energy efficiency provisions, to ensure that FEJA lives up to its promise.

The paper includes quotes and stories from advocates working in underserved communities to help describe FEJA's passage and their critical role in this accomplishment. Also, note that this paper will primarily focus on the energy efficiency provisions of the Act.

The Diverse Coalition Behind the Passage of the Future Energy Jobs Act

The main proponent of the energy efficiency and renewable energy portions of the Act was a coalition of stakeholders, advocates, and businesses calling itself the Illinois Clean Jobs Coalition.³ This section will recount the history of this coalition, how it achieved its current, increasingly diverse, membership, and ongoing efforts to ensure that the coalition represents a broad spectrum of clean energy interests in Illinois. To recount this history, the authors have relied on interviews with stakeholders and coalition members, documents created by the coalition, and our own recollections as members of the coalition.

The coalition formed when the environmental and consumer advocate communities realized that ComEd would propose legislation to stabilize its revenue. All major energy-related legislation in at least the past twenty years in Illinois has resulted from large package bills that address many sets of interests. Because of power analysis done internally within their organizations and by the Illinois Environmental Council, a statewide environmental umbrella group, many advocates believed that an environmental/consumer coalition could quash substantial utility legislation, but could not pass significant legislation of its own. Early coalition

² A 2014 study showed that people of color made up 36% of the U.S. population at that time, but they did not exceed 16% of the staff in any of the 233 environmental movement organizations surveyed (Taylor 2014).

³ As of June, 2018, the Coalition is still active: <https://ilcleanjobs.org/>.

members developed a theory of change that the environmental/consumer groups should put forth their own bill first and work for an acceptable compromise with the utilities.

Initial meetings to formulate a draft coalition bill, intended to reduce carbon emissions from Illinois' electric sector and save customers money through energy efficiency, began in the summer of 2014. The bill, commonly referred to as the Illinois Clean Jobs Act, was introduced in early 2015, before a utility-led bill was introduced (Senate Bill 1485, House Bill 2607). The Illinois Clean Jobs Coalition launched at the same time (Fortino 2015).

At first, the coalition was comprised of Illinois' usual-suspect advocates for renewable energy and energy efficiency, including the Citizens Utility Board, Environmental Law and Policy Center of the Midwest, Illinois Environmental Council, Natural Resources Defense Council, and the Sierra Club, among others. Early coalition members included just a few smaller organizations with specific focuses, like Elevate Energy and solar and wind industry associations.

As the legislative session continued, however, the coalition expanded to include a much larger group of supporters for the Clean Jobs Bill. Some new members who work very closely with frontline, environmental justice, and economically challenged communities, brought perspectives that had not been given a strong voice on energy legislation in the past. As the coalition developed and counted votes for the Illinois Clean Jobs Act, participants realized that widening the cast of characters at the Capitol and in negotiations strengthened the coalition's negotiating position and attracted new legislative support. Coalition members also enjoyed having a voice in this new, more democratic way of doing business and many advocates realized how this new way of working advanced other institutional and movement goals such as inclusion and equity.

As the coalition and circumstances developed, some coalition members challenged the theory of change, leading to a temporary split in the coalition over strategy. Ultimately, the final bill passed by the General Assembly was an environmental package formed by a compromise among a re-united coalition and carbon-free electric generation owners including the renewable energy industries and Exelon, ComEd's parent company.

Below is an overview of five of the environmental justice and economically disadvantaged advocacy groups that were essential players within the coalition and in helping get the low-income provisions, which were persuasive to many legislators, into the Act. Note that these five groups are only a portion of the groups involved in the Act's passage.

Faith in Place

Faith in Place is an interfaith environmental advocacy organization that works statewide in Illinois on environmental sustainability. Their work started in 1999 as a part of the Center for Neighborhood Technology. The group became an independent organization in 2003, and in 2004 they became the official Illinois Interfaith Power and Light affiliate (Faith in Place 2018). Faith in Place focuses on Care for the Earth in the form of work on environmental justice, energy and climate, sustainable food and land use, and water preservation issues. Their mission is to educate, connect, and inspire people of faith to work towards a sustainable future. Faith in Place's Policy Director, Pastor Booker Steven Vance, joined the coalition to represent the priorities of Faith in Place, but also to represent communities of color (Vance 2018). Pastor Vance recognized that he was one of the few diverse members at the table. Faith in Place did their best to listen, but to also challenge the coalition's status quo. Pastor Vance knew that "collaboration was key" in getting the Act passed, but it didn't come easily given the variety of groups and interests at the table.

(Vance 2018) Getting diverse groups from environmental justice and underserved communities to participate regularly in the coalition remains an area of needed growth.

Faith in Place continued to push for more diversity within the coalition as the Act's provisions were being negotiated. They worked to get important language into the final version of the law. They were one of the major advocates for including job training components, and ensuring that that training went to underserved communities first (Senate Bill 2814, 359). Pastor Vance also played an important role as a lobbyist for Faith in Place. He spent time in Springfield talking to legislators, and particularly members of the Illinois Legislative Black Caucus, convincing them that a clean energy future in Illinois was critical for environmental justice and economically disadvantaged communities.

Illinois People's Action

Illinois People's Action ("IPA") is an interfaith community organization based in Bloomington, Illinois, with active members throughout Central and Southern Illinois. The group has been organizing on social, environmental, and economic justice issues since 1996. Their members include faith-based, environmental justice, and social justice groups such as local NAACP chapters and a variety of churches (IPA 2018). IPA prioritizes leadership training, and ensuring that the issues they work on are those that have been identified by IPA members. The organization has a mission to empower its own membership to be part of the decisions.

IPA got involved with the coalition and working on what would become FEJA in 2015. IPA helped to draft language to strengthen protections for underserved and environmental justice communities. They also worked with their members to collect tens of thousands of petitions urging the Governor to pass the bill. Organizer Dawn Dannenbring remembers meeting with IPA's members all over central and southern Illinois to hear what they wanted the energy future of Illinois to look like (Dannenbring 2018). Those conversations with community members were where a good portion of the environmental justice language in the Act originally came from. IPA leaders wanted to ensure that their voices and needs were equally weighted at the coalition. As Dawn puts it, "an equitable process involves more than just everybody having the same opportunities. [An equitable process] involves removing barriers that prevent people from participating" (Dannenbring 2018). She felt that having an environmental justice group, Little Village Environmental Justice Organization ("LVEJO"), at the formal negotiating table was very helpful in ensuring that happened. The leaders at IPA are primarily from communities of color that have been hit "first and worst" by dirty energy, such as coal plants (Dannenbring 2018). IPA prioritized making sure that the clean energy provisions in the Act helped their leaders' underserved communities first.

There was acknowledgement from the coalition that decision-making needed to be done differently at the table, to allow diverse groups to truly participate. Dawn believes there is still room for growth around more equitable decision-making at the coalition. There need to be resources to help groups be involved at all levels. She believes that the work done on the Act was a good start, but silos still need to be broken down and groups from underserved communities need equal weight in decision-making and not just a token seat at the table.

Little Village Environmental Justice Organization

Little Village Environmental Justice Organization is a non-profit environmental organization that was founded in 1994 (LVEJO 2018). The organization serves and represents Little Village, a primarily Latino community on Chicago's Southwest side. LVEJO's role in the

passage of FEJA was important. They participated in the coalition and in the formal bill negotiations to ensure that the Act prioritized low income provisions.

LVEJO started working on environmental issues as a direct response to issues Little Village residents were facing. The organization has a history of fighting polluting factories in the neighborhood, and was successful in helping close two large coal plants located in their community, Fisk and Crawford, in 2012.⁴ LVEJO continues to work on clean energy, public transit, and open space campaigns. LVEJO also works on democratizing the energy process, and Just Transition issues.⁵ Policy Director Juliana Pino believes that it is critical for environmental advocacy work to include economically disadvantaged and environmental justice community members, people that are usually left out of the process (Pino 2018). The communities should have access to a clean environment with terms that work for them. Juliana took that belief with her when she joined the coalition to represent LVEJO.

Before LVEJO joined the coalition, the bill drafts did not properly reflect the needs of Little Village and other underserved communities. LVEJO got involved to intervene and organize on the policy, but also to help push for a different status quo of decision making - one that included and equally weighted input from community groups. When the coalition moved forward with formal negotiations of the Act, Juliana was selected as one of the lead negotiators to represent the needs of the environmental justice and economically disadvantaged communities. Being able to have an environmental justice negotiator at the table led directly to the inclusion of energy efficiency, jobs, and solar provisions explicitly for low-income communities in the Act. Those provisions have “real, substantive community impacts” according to Juliana. People in Little Village “are really worried about gentrification and displacement, and their energy bills being high is a big obstacle to being able to afford staying in their homes. So on a basic survival level, making sure that really strong energy efficiency programs are available for households, making sure those households have a role to play in how those programs are deployed – those were huge outcomes that communities really wanted to see in the law” (Pino 2018).

LVEJO also played a lead role on the solar side of the bill, helping with the creation of a low-income solar program called Solar for All. The program includes a jobs training pipeline component with the goal “that at least 50% of the trainees in this program come from within environmental justice communities and that 2,000 jobs are created for persons who are or were foster children and persons with a record” (Senate Bill 2814, 359). That language is another example of the result of having groups like LVEJO at the negotiating table. The low-income provisions help strengthen the law, but also reflect needs and desires that come directly from underserved communities in Illinois.

People for Community Recovery

People for Community Recovery (“PCR”) is a non-profit environmental organization that works out of and represents residents in Altgeld Gardens, public housing on Chicago’s far Southeast side. PCR's mission is to enhance the quality of life of residents living in communities affected by pollution. Their motto is “the voice of the voiceless” (PCR 2018). The late Hazel M. Johnson, who is widely considered the mother of the environmental justice movement, founded

⁴ LVEJO engaged in a 14-year long campaign to fight the Fisk and Crawford plants. They worked alongside members of the Chicago Clean Power Coalition (Thompson 2013).

⁵ “In a fair and just transition, affected workers, their unions, and communities are equal partners in a well-planned, carefully negotiated and managed transition from fossil fuels to clean energy” (Sierra Club 2015).

the group in 1979. Hazel started her environmental advocacy work to help bring awareness to the many environmental pollution issues her community was facing. Altgeld Gardens and the surrounding area was considered the area of Chicago with the highest incidence of cancer. Hazel wanted to do something to change that. Hazel was instrumental in the creation of Environmental Justice Executive Order 12898.⁶ This Executive Order brought legitimacy to the environmental justice movement, requiring each federal agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States” (Executive Order 12898).

The organization’s current Executive Director is Hazel’s daughter, Cheryl Johnson (Johnson 2018). Cheryl has a strong organizing background, as she helped her mother for many years with PCR’s advocacy efforts, but she also gained technical expertise when she worked at Argonne National Laboratory. Cheryl helps to represent the residents of Altgeld Gardens at the coalition, but also across a variety of other Illinois and national environmental networks, including the Illinois Energy Efficiency for All Coalition and the Chicago Environmental Justice Network. PCR works on tenant rights, economic development, clean energy, housing, health, and neighborhood safety issues. According to Cheryl, working to support the Future Energy Job Act aligned well with PCR’s mission and areas of work (Johnson 2018). As PCR looks for ways to reduce exposures to toxic pollutants, they are looking for alternate ways to get electricity in their community. Cheryl wanted to ensure that PCR’s voice and the voice of the residents living in public housing were heard in conversations around FEJA and at the coalition. PCR has seen firsthand how residents in low-income communities are often unable to afford their energy costs. Cheryl believes that “housing is a fundamental right that everyone should have” (Johnson 2018). She also believes that you can’t talk about housing without also talking about energy costs. The solar and energy efficiency provisions of the Act provide opportunities for residents of Altgeld Gardens and other economically disadvantaged communities to reduce their energy costs. Conversations have even begun to get solar panels installed at Altgeld Gardens. Cheryl will continue to work on ensuring that PCR and other housing community members are a part of important Illinois energy conversations and the implementation of the Act moving forward. Cheryl believes her mother Hazel would’ve been “really proud of the Future Energy Jobs Act and the work of the Clean Jobs Coalition” (Johnson 2018).

Prairie Rivers Network

Prairie Rivers Network (“PRN”) was established in 1967 and is based in Champaign, IL, but works on issues across the entire state (PRN 2018). PRN advocates for public policies and cultural values that sustain the ecological health and biological diversity of water resources and aquatic ecosystems. Their work focuses on clean water, energy, farming, rivers, and wildlife issues. They are also interested in clean energy issues because of the negative impact and legacy burning coal has had on the land, wildlife, and communities of Illinois. They’d like to see Illinois’ clean energy future prosper, including a reduction in greenhouse gas emissions and a movement away from a dirty energy economy. They believe that energy efficiency is a key component to that clean energy future. PRN has been a critical partner with the coalition. Executive Director Carol Hays participates in the coalition to represent PRN’s priorities, but also the needs of central and southern Illinois generally (Hays 2018). Recently, Carol has also been asked to lead a newer subset of the coalition, the downstate caucus. There was a realization by

⁶ Environmental Justice Executive Order 12898 was the first major federal action on environmental justice.

Carol and others that there was no formal body in the lower part of the state talking about clean energy issues. Carol has worked in central or downstate Illinois for many years, and is acutely aware of the lack of resources available in many of Illinois' more rural communities. There are economic challenges and barriers that prevent those communities from even thinking about clean energy, let alone knowing it is something to which they would be able to have access. PRN looks at its work on clean energy and the implementation of the Act from a Just Transition lens. Carol saw the Act as a way to offer communities a reason to come to the table and talk about their energy future.

Carol's strategic planning background has given her important insights into what makes a successful, diverse coalition. She praises the coalition and downstate caucus for intentionally working to engage frontline communities, the communities most burdened by the negative effects of climate change. The coalition has even adopted the Jemez Principles, which promote rules for democratic organizing (Jemez 1996).⁷

According to Carol, it takes practice and self-reflection to really ensure that operating principles like the Jemez Principles are not just a check-list. She believes that "how we approach this matters, the language that we use matters, the way we work together matters, the timescale that we're trying to do this in matters, the details matter" (Hays 2018). Communities who never thought they would see the value of solar and other clean energy technology now have the opportunity to personally see and experience its value. They also are excited by the possibilities of energy efficiency expansion, because energy efficiency "empowers people when they don't feel like they have control" (Hays 2018).

Provisions of the Future Energy Jobs Act

The Act's energy efficiency provisions alter Illinois' efficiency portfolio standard to:

- (4) Replace annual savings targets with cumulative persistent savings targets,
- (5) Increase the amount of efficiency savings that utility programs must provide,
- (6) Allow utilities to earn a rate of return on efficiency investments,
- (7) Specify minimum funding for efficiency programs targeting low-income communities,
- (8) Allow electric utilities to count some natural gas savings toward their efficiency targets,
- (9) Allow voltage optimization programs to count toward savings targets,
- (10) Require utilities to procure efficiency savings from third-party-administered programs,
- (11) Exempt customers with demand over 10MW from efficiency programs and funding, and
- (12) Caps utility efficiency spending and limits customer bill impacts.

In addition, the Act makes small changes to the existing Illinois on-bill finance program for energy efficiency (Public Act 99-906, Sec.5/16-111.7). Several of these provisions improve access to energy efficiency programs by all Illinoisans. This section will discuss each of these provisions in turn.

⁷ The Jemez Principles: (1) Be Inclusive (2) Emphasis on Bottom-Up Organizing (3) Let People Stand for Themselves (4) Work Together in Solidarity and Mutuality (5) Build Just Relationships Among Ourselves, and (6) Commitment to Self-Transformation.

Until the Act, Illinois' energy efficiency portfolio standard legislation required electric utilities to meet annual energy savings targets expressed as a percentage of energy delivered. As an unintended consequence, utilities emphasized measures that returned higher first-year savings, to the detriment of measures with higher lifetime savings. To place the focus on long-lived efficiency measures such as insulation and HVAC systems, the Act changed the utility's efficiency savings targets so that they measure cumulative persisting annual savings (Public Act 99-906, Sec. 5/8-103B(b)).

As the Act changed the calculations of Illinois' savings targets, it also raised the utilities' targets for energy efficiency savings. Before the Act, spending caps were limiting efficiency program size in Illinois, resulting in annual savings of 0.6-0.7% of electricity delivered per year (Berg et al. 2016, 138). After the Act, the new law will result in savings of 1.77% of sales across the two electric utilities from 2018 to 2021, rising to 2.05% of sales by 2026 (Berg et al. 2017, 156).

In return for increasing savings levels, the Act grants utilities a return on their investment in energy efficiency programs. The return will be based on the utilities' actual capital structures, including a cost of equity set by the Act, but will vary based on performance. These return-on-investment provisions were controversial during the legislative process. While some advocates believed that they will align the utilities' motivations with meeting the more stringent new targets, others expressed concern that the return would negatively affect customer bills and reward the utilities for complying with obligations they are already legally bound to meet. Significantly, the Act sets minimum funding levels for efficiency programs that target low-income households. The Act uses a commonly accepted definition of 'low-income' from the affordable housing sector as those earning less than 80% of the area median income.⁸ The Act requires ComEd to spend a minimum of \$25 million annually, and Ameren to spend a minimum of \$8.3 million annually, on programming that specifically addresses energy efficiency in low-income households. The funding levels vary because of the difference in size of the two utilities, with Ameren serving approximately one-third the households as ComEd. This increase in minimum funding levels is a significant improvement over just a few years prior, when Illinois' Department of Commerce and Economic Opportunity administered utility-funded low income efficiency programs totaling just over \$18 million per year (DCEO 2015).

The Act also allows electric utilities to save natural gas and count those savings, on a British thermal unit ("Btu") to Btu basis, toward their electric efficiency targets, requiring that they prioritize low-income programs when doing so. This provision was important to the coalition because cost caps have prevented Illinois' natural gas utilities from expanding programs for several years; gas efficiency delivers significant savings in Illinois' cold climate; measures offered by combined gas/electric programs are very cost-effective; and much of Illinois' housing stock was built before insulation was common practice and has not been upgraded.

The Act allows utilities to count savings from voltage optimization programs toward their efficiency savings goals. These programs optimize the voltage at points on the distribution system to reduce the amount of electricity that is consumed by end-use devices.

Utilities must also spend a portion of their portfolio funding to procure energy efficiency savings from third-party implementers through a bidding process. This provision was intended to

⁸ In Chicago, 52% of households fall under this definition. Throughout Illinois, 43% of households fall under this definition (Elevate Energy 2017).

ensure that incumbent implementers do not create a barrier to new market entrants by garnering all available contracts.

In a late amendment, industrial interests won an exemption for all customers with over 10 megawatts of demand. Consequently, very large customers do not pay into the portfolio, and they are not able to use the programs. As an unintended consequence, some community colleges, hospitals, and other large users who were eager to take part in, and fund, efficiency programs are unable to do so.

To calm fears that the overall bill, and the energy efficiency program spending, would not unduly raise customer bills, the Act caps the cost of utilities' energy efficiency program portfolios and caps the effect of the entire Act on customer bills. Utilities must show 10-year forecasts of rate impacts and create a remediation plan if forecasts show that customers will experience more than the allowed impact because of the Act.

And lastly, Illinois has an on-bill finance program that allows customers to finance energy efficiency improvements and pay back the loan on their utility bills. The Act made minor changes to this program, which go into effect in 2019, so that it can serve condominium associations and finance minor home repairs needed to facilitate efficiency measure installation.

Implementation

After the Act's passage at the 11th hour in Illinois' December 2016 veto session, utilities and advocates congratulated one another, caught up on their sleep, and got straight to work implementing the Act by filing, and commenting on, program plans at the relevant regulatory agencies.⁹ Coalition members are optimistic that the Act will dramatically improve energy efficiency and create jobs, especially in economically disadvantaged communities. To ensure this happens, and that the bill's low-income solar provisions are implemented rigorously, advocates are engaging with Illinois' regulatory agencies in previously-unseen ways. Generally, few advocates intervene or give public comments before the Illinois Commerce Commission. While proceedings related to the Act have consistent and strong input from Illinois environmental and consumer groups with the legal staff needed to intervene formally in these proceedings, the groups highlighted earlier in this paper do not have legal staff. Nonetheless, since the Act's passage, public comment numbers have soared, driven by grassroots efforts by coalition members.

To implement the energy efficiency programs, utilities took suggestions from stakeholders and coalition advocates before filing detailed program plans at the ICC. ComEd ultimately reached a settlement with intervening parties and the ICC approved ComEd's 2018-2021 program plan in September 2017. Ameren, however, argued that the ICC should lower its savings targets, as allowed by the Act when savings are not expected to be cost effective or reach program cost or bill impact caps. Ameren and advocates did not reach a settlement and the ICC partially granted Ameren's request for lower targets.

Significantly, both utilities' approved plans included more funding for low-income energy efficiency programs than was required by the Act, even though the Act's minimum requirements were an improvement on the utilities' historic low-income efficiency spending. In

⁹ Ameren's 2018-2021 energy efficiency plan was approved in ICC docket no. 17-0311; ComEd's in docket 17-0312; gas-only utilities also re-filed efficiency plans for a 4-year calendar-based cycle: Nicor Gas: 17-0310; People's / North Shore Gas: 17-0309.

2018, we expect ComEd to spend close to \$42 million and Ameren to spend over \$15 million on these programs (ICC 2017a, b). It appears that the utilities have heard and are responding to the advocates' message regarding the importance of equity in energy efficiency programming, as there are no provisions in the Act that require or incentivize this additional funding.

Coalition members are also deeply interested in workforce development and, specifically, ensuring that trained low-income and minority individuals are hired by contractors and that small, diverse contractors can grow their businesses, become utility trade allies, gain consistent business, and hire more members of their communities. In addition, coalition organizations from central and southern Illinois, such as Prairie Rivers Network, strongly support economic development in coal-plant and coal-mining communities in the region. The Act does not include workforce development provisions directly related to energy efficiency, but does include an investment in the solar workforce. ComEd is, however, taking steps to build and diversify its efficiency contractor base.

Coalition members will continue to monitor energy efficiency program performance and suggest improvements by responding to utility requests for input, participating in the ongoing Illinois Energy Efficiency Stakeholder Advisory Group, and through direct utility contact. Some coalition members, such as Elevate Energy, NRDC, and PCR, are also members of the Energy Efficiency for All coalition, which works to increase energy efficiency resources for affordable multifamily housing, and will continue to do so in any available forum. Collaboration with organizations from environmental justice and economically disadvantaged communities remains a priority in the Act's implementation, just as it was in passing the Act. According to Juliana Pino at Little Village Environmental Justice Organization, "it is as important, if not more important, for the implementation of these policies to be done right" (Pino 2018). One mechanism for community input is explicitly included in the Act, a requirement that utilities convene a low-income energy efficiency advisory committee to "assist in the design and evaluation of the low-income energy efficiency programs" that includes "representatives from community-based organizations" (Public Act 99-906). According to Juliana, this advisory committee will help remedy a "procedural injustice" in how energy efficiency programs have been created and evaluated (Pino 2018). The committee, called the Income Qualified Energy Efficiency Advisory Committee, will serve as a forum for underserved communities to have input into ComEd's and Ameren's new low-income energy efficiency programs, providing utilities with valuable insights into how their programs are working on the ground, and where changes may be needed to ensure program goals are fully realized.

Next Steps for the Coalition

The coalition is itself a forum for influencing the Act's implementation in collaboration with organizations from underserved communities. According to Carol Hays at Prairie Rivers Network, there is an aspiration by the coalition to continue to engage and listen to diverse partners, but it needs to be intentional and come from a place of honesty (Hays 2018). Many of the individuals we interviewed touched on the importance of how the coalition organizes itself. Practicing the Jemez Principles will be essential to truly collaborative implementation of the Act. Prairie Rivers Network and Illinois People's Action also expressed a desire to see more central and southern Illinois representation within the coalition (Hays 2018, Dannenbring 2018). The coalition formed a downstate caucus in the summer of 2017 to will help address that concern.

The coalition has a variety of working groups where groups from underserved communities can engage and influence the Act's implementation. LVEJO's Juliana Pino leads the Solar for All Working Group, dedicated to the low-income solar provisions of the Act, which has already had a great deal of success at the Illinois Power Agency in guiding implementation of the low-income solar provision of the Act.¹⁰ There is also an energy efficiency working group that includes LVEJO, People for Community Recovery, and Faith in Place, among others. It drafted a collaborative memo to the utilities to influence the development of the income qualified energy efficiency advisory committees (EEWG 2017).

Today, as the coalition works through the Act's regulatory implementation proceedings and engages in other, more direct efforts to influence program design and develop workforce development programs, its members continue to learn to work together as a team to achieve equity goals. This evolution is not easy, and has highlighted significant differences in priorities, capacity and resources, work styles, and level of understanding of equity issues. The coalition is working to refine its practices to bridge some of those differences and ensure a productive, collaborative space. Advocates from underserved communities stress that it is critical for this work to not be extractive, and instead reflect the needs and desires of communities and their residents. The coalition is persevering and learning to accommodate each other's needs, even as they learn what those needs are.

Conclusion

It has been 18 months since the FEJA became law, and Illinois is starting along its path to a cleaner, more energy efficient future. While it took over two years of hard work and negotiations to pass the Act, implementing the law to its true intent will be equally challenging. Prioritizing and implementing the low-income provisions of the Act must be inclusive of the groups from the environmental justice and economically disadvantaged communities those provisions are intended to serve. The Clean Jobs Coalition played an essential role in the Act's passage, and will only continue to be effective if it includes diverse stakeholders from across the state.

This paper highlights some of the advocacy organizations that helped pass the Act: Faith in Place, Illinois People's Action, Little Village Environmental Justice Organization, People for Community Recovery, and Prairie Rivers Network. These groups, and others like them, advocated to have underrepresented voices heard within the coalition, and to have their needs met by provisions in the Act. They continue to engrain new norms and democratic organizing practices within the coalition. The inclusion of low-income provisions in the Act would not have been possible without the efforts of these types of groups within the coalition and at the formal negotiating table.

References

Berg, W., S. Nowak, M. Kelly, S. Vaidyanathan, M. Shoemaker, A. Chittum, M. DiMascio, and C. Kallakuri. 2016. *The 2016 State Energy Efficiency Scorecard*. Washington, DC: American Council for an Energy-Efficient Economy. aceee.org/research-report/u1606.

Berg, W., S. Nowak, M. Kelly, S. Vaidyanathan, M. Shoemaker, A. Chittum, M. DiMascio,

¹⁰ The Illinois Power Agency is the regulatory body that oversees the state's renewable portfolio standard.

and H. DeLucia. 2017. *The 2017 State Energy Efficiency Scorecard*. Washington, DC: American Council for an Energy-Efficient Economy.
aceee.org/sites/default/files/publications/researchreports/u1710.pdf.

Dannenbring, Dawn, Organizer, Illinois Peoples Action, interview with Laura Goldberg, March 23, 2018.

DCEO (Illinois Department of Commerce and Economic Opportunity). 2015. *Illinois Energy Now 4th Quarterly Report*. July.
http://ilsagfiles.org/SAG_files/Quarterly_Reports/DCEO/DCEO_PY7/Dept_Q4_Report_PY7.pdf

Elevate Energy. 2017. Unpublished analysis of Census data, performed December 2017.

EEWG (Energy Efficiency Working Group). 2017. Memorandum re: Low-Income Energy Efficiency Advisory Committee.
http://ilsagfiles.org/SAG_files/Subcommittees/Low_Income_Advisory_Committee/Meeting_Materials/04112017_April/UtilityLIAAdvisoryCommitteeMemo_03.23.17.pdf

Exec. Order No. 12898, 3 C.F.R. (1994). epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice

Faith in Place. History. Accessed June 6, 2018. <https://www.faithinplace.org/who-we-are/history>.

Fortino, Ellyn. 2015. “New 'Clean Jobs' Coalition to Push for Stronger Illinois Energy Targets,” Progress Illinois. progressillinois.com/posts/content/2015/02/06/new-clean-jobs-coalition-push-stronger-illinois-energy-targets

Hays, Carol, interview with the authors, March 16, 2018.

House Bill 2607, 99th Illinois General Assembly (Ill. 2015)
ilga.gov/legislation/BillStatus.asp?DocNum=2607&GAID=13&DocTypeID=HB&LegId=88134&SessionID=88&GA=99

ICC (Illinois Commerce Commission). 2017a (Ameren). Docket 17-0311, Approval of the Energy Efficiency and Demand-Response Plan Pursuant to 220 ILCS 5/8-103B and 220 ILCS 5/8-104, Final Order, September 11. <https://www.icc.illinois.gov/docket/files.aspx?no=17-0311&docId=256620>

ICC (Illinois Commerce Commission). 2017b (ComEd). Docket 17-0312, Approval of the Energy Efficiency and Demand Response Plan and Update to the Energy Efficiency Formula Rate Cost Inputs Pursuant to Section 8-103B of the Public Utilities Act, Final Order, September 11. <https://www.icc.illinois.gov/docket/files.aspx?no=17-0312&docId=256554>

ICJC (Illinois Clean Jobs Coalition). 2016. *Future Energy Jobs Bill Summary*. December 4.
ilcleanjobs.org/future-energy-jobs-bill-summary/

IPA (Illinois Peoples Action). About Us. Accessed June 6, 2018.
<http://www.illinoispeoplesaction.org/about.html>

Jemez Principles for Democratic Organizing. 1996. Meeting hosted by Southwest Network for Environmental and Economic Justice, Jemez, New Mexico, December. ejnet.org/ej/jemez.pdf.

Johnson, Cheryl, Executive Director, People for Community Recovery, interview with the authors, March 15, 2018.

LVEJO (Little Village Environmental Justice Organization). History. Accessed June 6, 2018.
<http://lvejo.org/about-us/history/>

PCR (People for Community Recovery). About Us. Accessed June 6, 2018.
<http://www.peopleforcommunityrecovery.org/about-us.html>

Pino, Juliana, Policy Director, Little Village Environmental Justice Organization, interview with Laura Goldberg, March 23, 2018.

PRN (Prairie Rivers Network). Mission and History. Accessed June 6, 2018.
<https://prairierivers.org/about-us/mission-history/>

Public Act 99-906, Illinois Consolidated Statutes, 220 ILCS 5/8-103B (energy efficiency) and 220 ILCS 5/16-111.7 (on-bill finance). ilga.gov/legislation/publicacts/99/PDF/099-0906.pdf

Senate Bill 1485, 99th Illinois General Assembly. (Ill. 2015)
ilga.gov/legislation/BillStatus.asp?DocNum=1485&GAID=13&DocTypeID=SB&LegId=88120&SessionID=88&GA=99

Sierra Club. 2015. *Fair and Just Transition from Fossil Fuels to Clean Energy*. August 17.
<https://www.sierraclub.org/labor/fair-and-just-transition-fossil-fuels-clean-energy>

Taylor, Dorceta E. 2014. "The State of Diversity in Environmental Organizations," Prepared for Green 2.0, July.
https://orgs.law.harvard.edu/els/files/2014/02/FullReport_Green2.0_FINALReducedSize.pdf

Thompson, C. 2013. "Meet the Woman Who Shut Down Chicago's Dirty Coal Plants," *Grist*, April 15. <https://grist.org/climate-energy/interview-wkimberly-wasserman-nieto-goldman-prize-winner/>

Vance, Rev. Booker Steven., Policy Director, Faith in Place, interview with the authors, March 16, 2018.