



July 10, 2025

TO: Illinois Power Agency

FR: Climate Jobs Illinois (CJI)

RE: June 25 Request for Stakeholder Feedback on the IPA's 2026 Long-Term Renewable Resources Procurement Plan

Please direct questions and comments to:

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## About Us

Climate Jobs Illinois is a coalition of labor organizations advocating for a pro-worker, pro-climate agenda in Illinois. Our mission is to advocate for a clean energy economy at the scale climate science demands, create good union jobs and support more equitable communities. Our coalition represents hundreds of thousands of Illinois working men and women who are the best trained and skilled to build Illinois' new clean-energy economy from the ground up. By focusing on the construction of clean energy sources as a way to combat the climate crisis, Climate Jobs Illinois offers a compelling new approach to creating an equitable and clean economy. Building a clean energy economy is an opportunity for labor to lead on climate by creating high-quality family-sustaining jobs that spur economic development while reducing carbon emissions.

Climate Jobs Illinois is a state affiliate of the Climate Jobs National Resource Center. Climate Jobs Illinois is directed by a coalition representing hundreds of thousands of union members across Illinois, and our Executive Committee is comprised of leadership from:

- Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Union Chicago & St. Louis
- Mid-American Carpenters Regional Council
- International Brotherhood of Electrical Workers Local 134
- International Brotherhood of Electrical Workers State Council
- Illinois Education Association
- Illinois Federation of Teachers
- International Union of Operating Engineers Local 150
- Midwest Region of Laborers International Union of North America
- Great Lakes Region Laborers International Union of North America
- Illinois Pipe Trade Association
- International Association of Heat and Frost Insulators and Allied Workers

## **Background**

On June 25, the Illinois Power Agency (IPA) posted a [Request for Feedback](#) on Chapter 3 of the IPA's 2026 Long-Term Renewable Resources Procurement Plan. On behalf of our coalition members and their rank-and-file union members, Climate Jobs Illinois submits the following recommendations for Chapter 7, which pertain to clean energy labor standards and solar power incentives for public schools.

## **Chapter 3: REC Portfolio, RPS Goals, Targets, and Budgets and Program REC Pricing**

Topic 2: REC Prices and the REC Pricing Model

*Question 9a: Should REC prices for Public Schools should be calculated separately from DG projects?*

**Response:** Yes, our coalition is in favor of calculating public school RECs separately from traditional DG projects, especially if it will result in more favorable incentives for public schools. School districts face a unique set of challenges and obstacles when it comes to solar adoption, and those barriers should be recognized in the IPA's REC pricing model.

School districts are not as nimble as private solar developers, and often require additional time for multi-year capital planning, school board approvals, and bond referendums. Public schools need a REC pricing model that reflects these bureaucratic checks and balances, and the additional costs they may incur while adopting solar. The Public Schools block was created with the intention of

creating a new solar market for Illinois school districts, and it will take time to develop that new market. We must ensure that the REC pricing model meets the complex needs of public schools, so they are able to participate in the program fully.

*Question 9c: Are there costs or considerations that are unique to Public Schools projects that should be considered if calculating Public School projects separately? Please provide details.*

Response: In addition to the bureaucratic hurdles described above, Illinois schools are also facing serious obstacles related to interconnection delays and associated fees (especially for school districts receiving electricity from a municipal or cooperative utility). We have heard multiple complaints from individual school districts as well as the Illinois School Superintendent's Association about this issue. When solar projects stall out due to interconnection delays or additional fees, this erodes trust in the concept of solar on schools and the Illinois Shines Program.

Public schools could benefit from additional flexibility when it comes to disbursement of REC payments through the Illinois Shines program. Currently, REC contracts for public schools last 20 years, compared to 15 years in most other program blocks. Whenever possible, we encourage the IPA to shorten REC contracts in the Public Schools category from 20 years to 15 years. Legislation was introduced in the state legislature this Spring that would have given the IPA authority to adjust REC contracts during the Long-Term planning process. Shortening the REC contract would help schools capitalize REC incentives early on, providing stability in the absence of federal energy tax credits and improving participation in the program.