



Ampion, PBC.

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Illinois Power Agency

180 N Wabash Ave, Ste 500

Chicago, IL 60601

Ampion, PBC. Comments - 2026 Draft Long-Term Renewable Resources Procurement Plan

Dear Brian Granahan and the Illinois Power Agency,

Ampion, PBC ("Ampion") appreciates the opportunity to provide comments on the 2026 Draft Long-Term Renewable Resources Procurement Plan ("2026 Long-Term Plan"). We are a Designee who performs marketing, acquisition, utility allocation and subscription management services on behalf of Approved Vendors in the Illinois Shines Program. Please find Ampion's comments on the 2026 Long-Term Plan below.

7.3.4 Uncontracted Capacity at the Close of a Program Year

Ampion commends the Illinois Power Agency ("IPA") for proactively recommending enhancements to the Illinois Shines program and wholeheartedly supports the proposal to track withdrawn and canceled projects allocated to the previous Program Year's capacity. We support the approach to redistribute that capacity following the previous Program Year, however, we believe that an alternative reallocation process should be established for withdrawn and canceled projects. Cancelled capacity should be redistributed to the category for which it was initially contracted, as long as there is a waitlist in that category.

The current reallocation approach makes sense for uncontracted capacity, since the fact that capacity was not filled shows an explicit lack of interest in a specific category and warrants a reallocation to other categories receiving more interest. However, projects are withdrawn or cancelled for a variety of reasons which do not prove a lack of interest in the specific category for which the project originally applied. Therefore, making withdrawn or canceled capacity available under the same category in which the project was originally contracted maintains the capacity allocation commitments as stipulated in the 2026 Long-Term Plan.

7.9.6.2 Residential and Small Commercial Customer Participation

Ampion requests a slight revision to the sentence where the small subscriber rule for community solar subscribers is discussed. When referencing the ICC's decision that the 25 kW threshold must be determined at the single project level in determining eligibility towards the 50% small subscriber threshold, the current draft plan reads: *"The Agency will maintain this methodology for the Program Years covered until this 2026 Long-Term Plan"*. Ampion recommends revising this sentence to read: *"The Agency will maintain this methodology."* This will eliminate any confusion regarding the applicability of this ICC decision on Illinois Shines Program Years included in this 2026 Long-Term Plan and all future Program Years that are covered by the same statutory language interpreted by the ICC in its final order approving the 2024 Long-Term Plan.

9.5.1 Illinois Shines Disclosure Forms

Ampion requests that the IPA use their authority through the 2026 Long-Term Plan to enable the "To Be Determined" disclosure form option for Community Driven Community Solar ("CDCS") projects, which is available for Traditional Community Solar projects in the Illinois Shines program.

As an Illinois Shines Designee who performs marketing, acquisition, utility allocation and subscription management services on behalf of Approved Vendors, we have encountered Approved Vendors who have multiple CDCS projects with identical subscription offers for subscribers and very similar expected commercial operation dates. Without the "To Be Determined" option, subscribers can only be allocated to the specific project they were disclosed to. These situations have required the development of a complex and dynamic approach to customer acquisition and contracting, where multiple projects are filled simultaneously with customers for each specific project. However, there have been instances where project commercial operation dates are delayed for certain projects and we would be able to provide credits sooner to the subscribers who were contracted for the delayed site if we could use the "To Be Determined" option to allocate those subscribers to a different CDCS site in the Approved Vendors portfolio.

We believe it is in the best interest of subscribers by enabling them to benefit from CDCS bill credit discounts sooner than they otherwise would. While we believe that the "To Be Determined" option is in the best interest of subscribers, we acknowledge the need for a structure that ensures consumer protections and transparency. Therefore, we recommend that the "To Be Determined" option only be available for CDCS portfolios under a single Approved Vendor, for projects with identical subscription offers, including discount rate, and cancellation provisions.