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To: Illinois Power Agency
180 N Wabash Ave, Suite 500
Chicago, IL 60601

Subject: Comments on the 2026 LTRPP Draft

Dear Illinois Power Agency,

I am writing on behalf of BOW Renewables, a developer actively engaged in advancing renewable energy projects in Illinois. We appreciate the opportunity to provide public comments on the administration of the Illinois Shines program, particularly regarding the Commercial Operation Date (COD) deadlines for community solar projects and the collateral payments for community solar projects. Our feedback is informed by our direct experience in project development and aims to address key challenges that hinder the efficient deployment of these initiatives.

One primary concern is the current two-year COD deadline following the award of Renewable Energy Credits (RECs). This timeframe does not adequately align with the realities of modern project development timelines, which often extend to 18-24 months or longer due to factors such as permitting, interconnection studies, supply chain constraints, and construction delays. As developers, we cannot confidently assess a project's viability until we receive interconnection study results from the utility. Moreover, a project is inherently non-viable without securing an Illinois Shines REC award. Under the existing structure, developers are compelled to speculate on obtaining both favorable study outcomes and REC awards while committing resources to meet the compressed COD window. This introduces an unacceptable level of risk, potentially deterring investment and slowing the state's progress toward its renewable energy goals.

To mitigate these issues, we respectfully recommend the following adjustments:

1. Extend the COD Deadline: Increase the two-year COD window to five years from the date of REC award. This extension would better accommodate the extended timelines associated with utility interconnection and construction, providing developers with the necessary flexibility to bring projects online successfully without the necessity of applying for extensions and or exemptions.



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2. Align with Application Submission and Utility Timelines: Alternatively, or in conjunction with the extension, align the COD deadline with the projects' interconnection and construction schedules. This could involve tying the deadline to key milestones, such as the completion of interconnection studies or the execution of interconnection agreements, rather than solely to the REC award date. Such an alignment would ensure that developers are not penalized for delays beyond their control and would streamline the overall process from application submission through to commercial operation.

We also seek to address the timing and conditions surrounding collateral payments. Requiring developers to post collateral before signing an interconnection (IX) agreement places undue financial burden on projects that may later prove unviable due to high interconnection costs or utility-mandated downsizing. We recommend the following:

- **Defer Collateral Posting:** Require collateral payments only after an IX agreement is signed, ensuring developers have greater clarity on project feasibility.
- **Penalty-Free Withdrawal:** Allow developers to withdraw from a REC contract without penalty if interconnection costs or utility-required downsizing render the project economically unviable.

We strongly support Section 7.12.2.1 of the draft 2026 Long-Term Renewable Resources Procurement Plan (LTRRPP), which aligns with these principles by emphasizing support for small and emerging businesses. These changes would reduce barriers for developers, particularly smaller entities, and foster a more equitable and competitive renewable energy market.

These proposed changes would reduce financial and operational risks for developers, foster greater participation in the Illinois Shines program, and ultimately support the expansion of community solar capacity in the state. We believe they are essential to maintaining a robust and equitable renewable energy marketplace.

Thank you for considering our comments. We are available to discuss these recommendations further and provide additional data from our projects if needed. Please feel free to contact me at any time.

Best regards,

Kyle Huseby