



September 29, 2025

TO: Illinois Power Agency

FR: Climate Jobs Illinois (CJI)

RE: August 15 Request for Public Comments on the IPA's 2026 Draft 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 Public Comments](#) on the IPA's 2026 Draft 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 10, which pertain to Minimum Equity Standards for IPA-sponsored programs and the Energy Workforce Equity Portal.

Chapter 10: Diversity, Equity, and Inclusion

10.1 Minimum Equity Standards

The Current standards in the Minimum Equity Standard (MES) Waiver Request included in the 2025-26 Illinois Shines Program Guidebook – Appendix J require signatory contractors to make efforts which would violate contractual obligations in collective bargaining agreements (CBAs) to secure enough points to waive MES requirements. The current scoring criteria for waiver eligibility render it effectively impossible for union contractors to secure waivers without violating industry-standard CBAs.

Further, the process for registering union members as Equity Eligible Persons presents significant challenges to union contractors and labor unions themselves, leading to significant undercounts of union members who live in Equity Eligible Communities or who may otherwise be eligible as EEPs. Other methods of verifying union members as EEPs, especially checking EEP eligibility against Certified Payroll records submitted by contractors, may lead to a more accurate accounting of union member EEPs.

Many union-signatory contractors in Illinois are contractually obligated to use union referral halls to recruit employees. This practice is industry-standard nationwide for most union-signatory contractors. Almost all union contractors must hire qualified union members referred by each trade's referral hall. Union contractors are not allowed to hire trade workers from outside of this referral system absent extenuating circumstances.

At least nine of the twelve criteria in the current Scoring Table for MES waiver eligibility require efforts which would violate a typical CBA. These include criteria requiring employers to offer jobs or accept referrals from lists of EEPs for future jobs; through qualifying workforce training programs; through outreach to EEPs on the Illinois Shines Program website; by posting positions via the Workforce Equity Portal; through community colleges; through community-based organizations; through Illinois Worknet; or through other employment platforms. Taking any of these steps would violate most union-contractor CBAs.

These nine criteria represent 23 of the total 35 possible points for waiver eligibility. Under this scoring system, no union contractor could receive more than 12 points. Union contractors must earn 16 or 20 points to earn a waiver. As a result, it is impossible for union-signatory contractors obligated to use a referral hall to meet the threshold to qualify for a waiver without violating their CBAs.

Only one criterion fully aligns with the contractual obligations of contractors who are required to utilize referral halls: "Signed letter from the trade union stating no apprentices or journey worker is available that meets the criteria." This criterion is only worth 7 of the required 16 or 20 points.

Labor unions in Illinois are committed to achieving the laudable equity goals the Minimum Equity Standard seeks to uphold. Unions have taken efforts to identify and register their eligible members as EEPs. Union members are diverse and live in every community in the state. For some locals, as many as 20% to 25% of union members may be eligible to register as EEPs in some regions. Efforts to register these members are ongoing.

However, the EEP registration can be onerous for unions, even where they are actively working to participate. Similar criteria required by EEP registration is required for other reporting systems, including Certified Payroll reporting. The utilization of extant reporting by contractors to automatically register EEP-eligible union members would lead to fairer representation of unions'

contributions to equity goals on solar job sites. Other solutions, such as accepting union data to certify members' addresses, could also support the registration of union members as EEPs.

Unions across the state have also worked actively to engage with CWPP programs, Illinois Works Programs, Highway Construction Career Training Programs, and similar community-based efforts to encourage qualified candidates to apply for union apprenticeship programs. Illinois unions and union apprenticeship programs are committed to CEJA's goal of ensuring our clean energy future benefits all Illinoisians.

The current Minimum Equity Standards and relevant processes are biased against union contractors. Most union-signatory contractors will be mathematically unable to obtain a waiver without acting in violation of their CBA. As a result, the current scoring criteria wrongfully harm union-signatory contractors' ability to compete for bids fairly and invade their freedom to contract with their signatory unions.

We strongly advise a revision to these scoring requirements to better reflect the hiring systems employed by the majority of union contractors, and to ease the process of registering or certifying union members as Equity Eligible Persons.

10.5 Energy Workforce Equity Portal

We recommend that the IPA address the current disconnect between the self-attestation portal and the contractor self-certification process. As designed, these two systems are producing incomplete data and do not accurately reflect union participation in clean energy projects.

Union contractors are already entering workforce information, but this data is not being fully captured or integrated into the self-attestation portal. As a result, union contributions are undercounted, creating an inaccurate picture of the workforce and undermining the accountability framework that CEJA envisioned.

To resolve this issue, we recommend the following actions:

1. **Integrate the Self-Attestation portal and contractor self-certification process** into one unified reporting system.
2. **Ensure that data submitted by union contractors is directly incorporated** into Self-Attestation reporting so that it is accurately reflected in statewide metrics.

3. **Cross-verify reported data with certified payroll or other reliable sources** to ensure accuracy and consistency across systems.

Making these changes will strengthen the integrity of IPA's reporting systems, ensure accurate recognition of union participation, and better align data collection with CEJA's goals of promoting high-road, family-sustaining union careers in the clean energy sector.