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Comments on the 2026 Long-Term Renewable Resources Procurement Plan Draft Submitted by the Metropolitan Mayors Caucus

Thank you for the opportunity to comment on the 2026 Long-Term Renewable Resources Procurement Plan Draft (LTRRPP Draft). The Metropolitan Mayors Caucus (Caucus) is a non-profit council of governments representing 275 municipalities in northeastern Illinois. The Caucus has extensive experience advocating for, developing, and delivering clean energy programs for local governments and the constituents they serve. Notably, the Caucus membership includes 130 environmental justice communities as identified by US EPA and IEPA tools.

In our experiences proposing and implementing clean energy programs that are covered by the existing LTRRPP, we find that local governments are inconsistently, naively, and unfairly treated in IPA programs and subprograms. Much of this stems from inconsistent, inaccurate, or absent definitions throughout the LTRRPP as described below. This results in confusion about program eligibility. We request these problematic definitions or lacking definitions be corrected in the final LTRRPP.

1. Community-based organization definition:

First, **local governments** are defined as community-based organizations in the Climate and Equitable Act (CEJA) and therefore eligible for all programs and benefits afforded to community-based organizations (CBOs): CEJA defines CBOs as:

*“Community-based organizations’ means an organization that: (1) provides employment, skill development, or related services to members of the community; (2) includes community colleges, nonprofits, and **local governments**; (3) has at least one main operating office in the community or region it serves; and (4) demonstrates relationships with local residents and other organizations serving the community.”*

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The LTRRPP should align its definition of CBO with CEJA. Instead, the LTRRPP Draft. Language on p. 377 instead states, “While the IPA Act does not define the term “community stakeholders,” the National Community–Based Organization Network (NCBON) defines a community-based organization as one in which:

- The majority of the governing body and staff consists of local residents,
- The main operating offices are in the community,
- Priority issues areas are identified and defined by residents,
- Solutions to address priority issues are developed with residents, and
- Program design, implementation, and evaluation components have residents intimately involved, in leadership positions.”

In this case, not defining the term, “community-based organization” yet deferring to a national organization that has no bearing on energy policy in Illinois is irrelevant and inconsistent with practice in the state of Illinois. However, the definitions are similar in function and the CEJA definition which explicitly includes local governments should be used in the final LTRRPP where it lacks a definition.

2. Requirements for public entities to qualify as a community-based organization

Correcting the definition of CBO to align with CEJA and include local governments should replace this awkward and confusing requirement under Section 8.5.5 Community Solar Sub-Program p. 378.

*“Furthermore, the Agency believes the intent of the IPA Act was to create substantial partnerships, going beyond just holding a few community meetings. In addition to information regarding location, development and participation, these partnerships should include a description of how the partnership shows that it is responsive to the priorities and concerns of income-eligible members of the community. **A public entity may qualify as a community-based organization for this purpose, but only if the public entity meets the following requirements:***

- *The public entity must represent a municipality or county (or school district, park district, etc.) in a municipality or county in the bottom 25% of the state by population. “*

What does this mean? “The public entity must **represent a municipality** or county (or school district, park district, etc.) **in a municipality** or county in the bottom 25% of the state by population. “If the public entity is a municipality, how can it represent a municipality in a municipality in the bottom 25%? Does this mean only small

communities can be defined as a community-based organization that conflicts with CEJA? Is this consistent with the Environmental Justice Communities Map? This sentence is non-sensical and should be eliminated.

Further, in the same section, *“The public entity must certify that no local community-based organizations exist that are capable of filling this role.”*

Why should a certification be required for a local government serving eligible residents be required? How is this to be accomplished? Adopt the CEJA definition of community-based organization to eliminate the need for this convoluted

3. Exclusive and confusing requirements for Grassroots Education Funding

In Section 8.15 Grassroots Education Funding, p 435 there is inconsistency with other programs in the LTRRPP which disadvantages local governments and harms environmental justice communities. By this confusing explanation below, it is unclear that local governments are eligible to participate as grassroots education providers.

*“Section 1-56(b)(3) of the IPA Act as amended by Public Act 102-0662 also requires that the Agency “direct that up to 5% of the funds available under the Illinois Solar for All Program to community-based groups **and other qualifying organizations** to assist in community-driven education efforts related to the Illinois Solar for All Program,*

*For the purposes of grassroots education, **community-based organizations must be registered non-profit entities**, excluding trade or political non-profits. It is recognized that the definition of community-based organizations or non-profit is very broad and may include a variety of organization types. **It is not required that non-profit organizations have federal 501(c)(3) status, and collaborative or fiscal sponsorship should be encouraged to ensure that very small, hyper-local organizations can participate.”***

Again, very confusing. How can an organization be a “registered non-profit entity” and not be required to have 501c3 status. The definition of community-based organization here should again be consistent with the definition in CEJA.

4. Public entities treated inconsistently in LTRRPP Draft

Yet in Section 7.4.5.1 Community-Driven Community Solar Selection Criteria public entities are referenced as effectively equal to no-profit organizations in the community-driven community solar scoring rubric items C-E, *“Engagement in project operations and management by nonprofit organizations, public entities, or community members.”*

It is also worth noting that local governments are not acknowledged in the *Non-Profit and Public Facilities Subprogram* and non-profits are not referred to as CBOs which is inconsistent with other definitions in LTRRPP Draft described above.

However, municipalities are eligible to be “approved vendors” in Section 7.7 Approved Vendors p. 281. *“Approved Vendors could include a company that specializes in the aggregation and management of RECs; a for-profit developer or installer of photovoltaic systems; **a municipality**; or a non-profit serving a specific sector of the community, among others.*

Again, this is inconsistent with other LTRRPP programs and definitions.

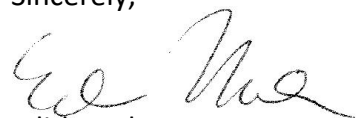
5. Approach for Defining Environmental Justice Communities

We wish to acknowledge the sincere attempt to include environmental justice communities and impacted population on LTRRPP programs. However, the fundamental approach to defining eligible environmental justice communities is itself exclusive and unfair. Robust criteria (EJ Screen, EJ Start, CEJST and CalEnviroScreen) for determining environmental harm and therefore eligibility is undermined by the bizarre IPA policy to include only, *“communities with scores in the top 25%”*. This excludes dozens of otherwise impacted and deserving communities. As noted in our introduction, the Caucus serves at least 130 communities with EJ designated census tracts. Excluding those that don’t have scores in the top 25% disadvantages communities known to be suffering environmental injustice. This exclusive policy is unfair and ineffective.

The process for self determination of EJ communities is burdensome, unnecessary and has not resulted in effective distribution of resources to EJ communities identified by Illinois EPA and USEPA. We request reconsideration of this unfair practice in the updates to the Environmental Justice Communities Map.

We request modifications in the final LTRRP that is more inclusive of local governments as eligible partners in achieving the goals of P.A. 102-0662 as presented in the draft Long-Term Renewable Resources Procurement Plan. Thank you.

Sincerely,



Edith Makra

Director of Environmental Initiatives