COMMENTS OF SOLAR LANDSCAPE ON THE 2026 DRAFT LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN

September 29, 2025

Introduction

Solar Landscape appreciates the Illinois Power Agency's ("IPA") continued commitment to developing the 2026 Long-Term Renewable Resources Procurement Plan ("LTRRPP"). We submit these comments based on our experience with Illinois Shines, particularly Community-Driven Community Solar ("CDCS"), and our mission to expand equitable clean energy access, workforce development, and meaningful community benefits across Illinois.

As the nation's leading developer of rooftop community solar, we partner with local workforces, schools, and community based and training organizations including the Chicago Urban League, Hispanic American Construction Industry Association, YouthBuild, Garfield Park Community Council, and the Institute of Cultural Affairs to ensure projects deliver lasting community benefits. We commend the IPA's transparent process and stakeholder engagement and focus our comments on CDCS-related provisions that will strengthen CEJA and FEJA implementation.

Program Capacity and Federal Incentives

We strongly support expanding annual Illinois Shines capacity from 800 MW to at least 1,200 MW. This increase will:

- Meet growing demand and reduce program bottlenecks.
- Enable more shovel-ready, equity-focused projects to proceed without delay.
- Align Illinois projects with federal timelines.

The new federal legislation requires developers to offer proof that projects have begun construction by July 4, 2026, to qualify for the 30% federal Investment Tax Credit (ITC). Solar developers use safe harbor strategies to ensure they qualify for these credits as they are a crucial part of project financing. Without additional capacity, shovel ready Illinois projects risk missing the safe harbor deadline, reducing project viability, postponing projects indefinitely and shifting costs back to state REC budgets. Frontloading capacity ensures more projects are completed, more jobs are created, and CEJA's goals are advanced while federal support is strongest.

Uncontracted Capacity Waitlist Ranking

We commend the IPA for moving CDCS to second on the Uncontracted Capacity waitlist; however, we urge further action and respectfully request you consider moving CDCS to first. Doing so can help accomplish the following:

Enable wider reach to equity-priority communities
Prioritizing CDCS would provide wider reach to residents. Unlike Small DG, which primarily benefits homeowners, CDCS serves renters, small businesses, nonprofits, and other community stakeholders. Each project reserves 50% of capacity for small subscribers and offers portable subscriptions—structurally delivering broader access.

Enhance program resilience
CDCS enhances program resilience through:

- Geographic diversity across urban, suburban, and rural areas
- Portfolio stability during times of interconnection delays, financing challenges, or federal policy shifts
- Model diversity beyond individual rooftop systems, ensuring broader participation and risk mitigation

Drive deeper and more intentional community engagement
By encouraging partnerships with community-based organizations, cities, towns, villages, and workforce development partners, CDCS provides meaningful community benefits by turning local solar generation into a platform for civic and economic engagement.

Support workforce development and local economic impact
CDCS is the most effective pathway for advancing CEJA's workforce goals. Developers partner with workforce intermediaries and nonprofits to create job training and career pipelines in equity-priority communities. For example, Solar Landscape's partnerships with the Chicago Urban League, Hispanic American Construction Industry Association, YouthBuild, and STEP-UP Solar (our non-profit training partner) connect residents to hands-on solar installation training and direct employment in Illinois's solar industry. These opportunities can disappear without predictable CDCS contract awards.

Provide location-based benefits and grid cost savings
Many CDCS projects are developed on commercial rooftops in urban or industrial areas. By locating close to the load they serve, these projects reduce reliance on transmission lines and ease stress on the distribution system. Studies from Lawrence Berkeley National Laboratory (LBNL) and the National Renewable Energy Laboratory (NREL) confirm that distributed solar near load centers can produce avoided costs of $10/MWh to $40/MWh in transmission and distribution savings, especially in high-demand areas.[1]

Protect CEJA's legislative intent and equity goals
Ranking CDCS second risks under allocating the very category designed to meet CEJA's equity goals. Because CDCS is ranked behind Small DG, and because Small DG is such a large category relative to CDCS, CDCS always runs the risk of having no capacity allocated in the Uncontracted Capacity waterfall, should Small DG be even moderately oversubscribed

[1] Lawrence Berkeley National Laboratory, *Locational Value of Distributed Energy Resources: Methods and Applications in Practice*, Schwartz et al., January 2023, p. 17. LBNL-2001559. https://eta-publications.lbl.gov/sites/default/files/lbnl_locational_value_ders_final.pdf

relative to its allocated megawatts. Delays in approvals by the IPA reduce project economics, deter financing, and cut into funding for subscriber savings, job training, and local partnerships.

Bringing as much CDCS project capacity online before federal ITC deadlines will ensure the much-needed workforce and community benefits from this program are realized in communities across the state and that as many large commercial projects as possible can continue to support equity priority communities. With grant programs and non-profit agency budgets seeing massive cuts, these CDCS benefits have become more important than ever.

Key Policy Recommendations

In addition to the above, we respectfully submit the following additional policy recommendations:

1. Project-TBD Subscriber Forms for CDCS Projects

Permit CDCS developers to enroll subscribers with "Project TBD" disclosure forms, consistent with Traditional Community Solar. This flexibility would improve subscriber acquisition, create more equitable outcomes for subscribers, and reduce confusion.

2. Rooftop Adder for CDCS

Extend the existing $5/REC rooftop adder to CDCS projects. Rooftop CDCS faces identical cost pressures as Traditional Community Solar, while delivering distinct community benefits and avoiding land-use conflicts. CDCS projects receive higher scores when they pass through a portion of the REC value to the community, so increasing REC compensation for rooftop CDCS directly increases the financial benefit delivered to equity priority communities.

3. Revise "Community" Definition in High-Population Counties

In Cook, DuPage, Kane, Lake, McHenry, and Will, redefine "community" at the county—not township—level. Townships are not meaningful social units in these areas, and their boundaries unnecessarily divide municipalities and exclude residents. As defined under CDCS, benefits are limited to township boundaries, resulting in a single village being cut apart, with some residents eligible and others arbitrarily excluded even if they share the same neighborhood, school district, or sense of cooperative spirit. These challenges undermine the intention of CDCS in the counties that could benefit the most from direct benefits developers provide back to the community.

4. ***Reallocate Capacity from Cancelled Projects back to the Category***

Reallocating capacity from cancelled projects back to the same program category ensures that available incentives are fully utilized to expand solar deployment rather than sitting idle. This approach will ensure program effectiveness and accelerate MW deployment to the grid.

5. Subscriber Transfer Flexibility

Allow Approved Vendors to transfer subscribers between CDCS projects in the same utility territory and at the same discount rate. This protects subscriber savings, reduces attrition risk, and ensures uninterrupted access to clean energy

6. No Developer Cap

Maintain the Agency's rejection of a CDCS developer cap. Arbitrary limits strand viable projects, disrupt community partnerships, and stall program benefits.

7. Clarify Co-Location Rules

Continue exempting rooftop projects from co-location restrictions. Each building has natural size limits and distinct ownership. Applying ground-mount rules to rooftops would be administratively burdensome and counterproductive.

8. Tariff-Related Deadline Relief

New federal import tariffs and supply chain disruptions will slow developers' ability to execute project completion on old timelines. Allow energization deadline extensions for projects directly impacted by new federal import tariffs and supply chain disruptions.

Conclusion

The Illinois Shines Program has become a national model for equitable solar development. To fully realize CEJA's vision, and encourage solar developer participation, CDCS must be prioritized with predictable capacity, fair incentives, and more flexible program rules.

Solar Landscape thanks the IPA for its leadership and for considering these comments as it finalizes the 2026 Long-Term Plan.