



COMMENTS ON THE DRAFT 2026 LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN ON BEHALF OF SUMMIT RIDGE ENERGY

September 29, 2025

Summit Ridge Energy (SRE) appreciates the opportunity to comment on the 2026 Draft Long-Term Renewable Energy Resources Plan (Draft LTRRPP) dated August 15, 2025.

I. Introduction

Summit Ridge Energy recognizes the thoughtful design of the Draft LTRRPP and commends the Illinois Power Agency's (IPA) ongoing leadership in advancing renewable-energy development. As a committed partner in these efforts, SRE looks forward to continuing to invest in Illinois to assist our state's efforts in meeting our energy goals.

Recent federal action with the OBBB Act, and the subsequent IRS and Treasury guidance implementation, has reshaped how projects qualify for and monetize federal tax credits. These changes introduce near-term uncertainty for solar developers and create challenges for Illinois to meet our energy needs and manufacturing goals.

Through our experience in Illinois and across the country, rooftop community solar facilities achieve many of the goals laid out in CEJA. These projects reduce interconnection distances and congestion, broaden workforce opportunities in equity eligible communities for local contractors, minimize impacts to prime farmland, and place generation closer to growing load.

Illinois is experiencing concentrated load growth from electrification, commercial expansion, and new data centers. Siting rooftop community solar near load centers can enhance grid efficiency and customer value, delivering targeted benefits at lower system cost. Despite the many benefits of these built-environment projects, development challenges remain as these projects operate with tighter margins. These challenges underscore the need for targeted steps that bring certainty and speed to rooftop development.

In line with the Draft LTRRPP's objectives and given federal-policy uncertainty, SRE focuses these comments on rooftop community solar and supports the Joint Solar Parties where aligned.

II. Comments on Draft LTRRPP

A. Chapter 3

Summit Ridge Energy is supportive of the comments submitted by the "Joint Solar Parties."

B. Chapter 7

SRE supports the Joint Solar Parties’ comments and submits the following on Section 7.4.3.1 (TCS Scoring - Siting) to advance CEJA’s intent and the State’s policy goal that the benefits and savings of solar be available to every community.

Even as total community solar installations rise, relatively few systems are in or immediately adjacent to urban areas. County-level data in the Draft LTRRPP clearly shows this failure. This pattern is driven by limited greenfield availability near load centers, while significant rooftop and other built-environment square footage remain underutilized. Recognizing this limitation, it is also important to acknowledge the hurdles rooftop projects face compared to ground-mounted systems.

Rooftop projects are typically smaller in size, face higher per-watt costs, have lower annual production, and shorter lease lengths that together limit project development opportunities. Consistent with CEJA’s purpose and the Draft LTRRPP’s emphasis on the built-environment, SRE’s goal is to offer recommendations to bridge the gap that leaves many rooftops unable to pencil.

SRE appreciates the Draft Plan’s improvements of expanding subsection C to “five or fewer” projects beginning in the 2026-27 Program Year and acknowledges the concerns over colocation. As such, SRE recommends a narrow improvement to this language that achieves the state’s policy goals for equity-eligible and urban communities.

Rooftop Exemption Recommendation

SRE conducted a review of IPA awarded project data for two communities, Franklin Park and Pontiac. We selected these locations because they illustrate the siting realities developers encounter in load-dense areas with abundant roofs compared to areas where ground-mount sites are more prevalent. The goal is to assess how those conditions interact with Traditional Community Solar scoring and participation.

Under the proposed “five or fewer projects” TCS criterion, areas with untapped rooftop potential like Franklin Park would realize less benefit than ground-mount areas because their average project size is roughly half as large. This comparison shows how a project-count cap without a rooftop exemption limits total MW development in load-dense areas, even when suitable roofs are available.

City	Number of Projects	Total MW AC	Average Project Size (MW AC)
Franklin Park	8	15,160	1,895
Pontiac	5	23,980	4,796

Proposed Language

- **Exclude rooftop and built-environment projects from the calculation in Traditional Community Solar Scoring Guidelines 2c.**

- Proposed Language: “Sited in a county (or a township within Cook, DuPage, Kane, Lake, McHenry or Will County) that has five or fewer community solar projects that were approved by the ICC for a REC contract under the Adjustable Block Program at the time of application; projects located on a rooftop or other built-environment site are exempt.”

SRE recognizes this is a material change to program design. For administrative simplicity and to encourage additional deployment where it is most needed, SRE proposes a narrow exemption for rooftop and other built-environment projects from the Traditional Community Solar Scoring Guidelines 2c calculation. This exemption prioritizes built-environment deployment where greenfield siting is constrained.

This exemption would provide greater certainty for acceptance into the program for developers pursuing rooftops in urban areas experiencing significant load growth from new large users and electrification. As Illinois continues to modernize its electricity grid, this certainty can help foster rooftop development where community solar deployment has lagged.

Additionally, the IPA and the State of Illinois have emphasized expanding equity-eligible contractors (EECs). Increased rooftop development near these businesses and communities can create proximate opportunities for EECs to build skills, gain experience, and grow their enterprises.

Rooftop REC Adder Increase

Illinois needs both siting prioritization and a targeted REC adder to close the revenue gap and enable rooftop projects in load-dense areas. A rooftop adder fits within existing procurement blocks and ties payment to public benefits like using the built environment, siting near load, shorter interconnections, workforce development priorities, and avoiding prime farmland.

The Traditional Community Solar siting recommendation helps bring projects to the right places, but on its own it does not bridge the gap for capacity factor differences. As seen, the current \$5 REC adder has helped spur additional rooftop developments. However, it is insufficient to fully unlocking the unmatched potential in urban areas.

Based on IPA’s awarded-capacity data for ComEd’s territory, rooftop community solar consistently shows a ~38% lower capacity factor than ground-mounted projects for the same region. The current REC value for these projects only delivers a ~15% higher monetary value, making up less than half of the lost revenue compared to ground-mount projects. SRE’s review of this data¹ shows the remaining gap is just over \$17/MWh as shown below.

¹ Full data set provided in appendix.

Project Type	Average Capacity Factor	% Difference	REC	% Difference
Rooftop Community Solar	18.473	-38%	51.617	15.32%
Ground Mounted Community Solar	25.472	0%	44.759	0%

*Full data set provided in appendix.

Accordingly, **SRE recommends the IPA increase the Rooftop Community Solar REC Adder**, reflecting the observed differential and bringing rooftop projects closer to parity with comparable ground-mounted community solar projects.

C. Chapter 9

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

D. Chapter 10

Summit Ridge Energy is supportive of the comments submitted by the “Joint Solar Parties.”

III. Conclusion

Summit Ridge Energy appreciates the Illinois Power Agency’s leadership in steering Illinois’ clean-energy transition through a period of federal uncertainty. The IPA has positioned the state as a national leader in delivering the benefits of local projects to the communities they serve. Building on this progress, Illinois is positioned to deliver solar benefits statewide, especially in urban communities.

Our recommendations in this filing aim to bring certainty and speed to rooftop development in two ways. 1. They create a targeted exemption that aligns siting with where growth is occurring. 2. They establish a calibrated rooftop REC adder that makes close-to-load rooftop projects pencil. Together, these refinements support CEJA’s goals, create nearby opportunities for equity-eligible contractors and workers, and help the state add capacity where customers live and businesses are expanding. SRE stands ready to partner with the IPA, utilities, and stakeholders on implementation and to provide additional data or technical support as needed.

Sincerely,

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