



ILLINOIS POWER AGENCY

**Illinois Shines Program REC Contract
and Illinois Solar for All Program REC Contract
Request for Stakeholder Comments**

April 17, 2026

Background

In accordance with Section 16-111.5(b)(5)(ii)(B) of the Public Utilities Act, on October 20, 2025, the Illinois Power Agency (“Agency” or “IPA”) filed the 2026 Long-Term Renewable Resources Procurement Plan (“2026 Long-Term Plan”) for approval by the Illinois Commerce Commission (“ICC”). The ICC approved the 2026 Long-Term Plan with modifications in Docket No. 25-0945 on February 17, 2026.

Additionally, Public Act 104-0458 (the “Clean and Reliable Grid Affordability Act”) was signed into law on January 8, 2026, and becomes effective June 1, 2026. This legislation includes substantial updates to the Illinois Shines and Illinois Solar for All programs.

The 2026 Long-Term Plan, as approved, and Public Act 104-0458 call for updates to the Illinois Shines Program (also known as the “Adjustable Block Program” or “ABP”) and Illinois Solar for All Program (“ILSFA”), which support new photovoltaic distributed generation and community solar projects through separate Renewable Energy Credit (“REC”) delivery contracts.

On April 17, 2026, the Agency posted the draft of the 2026 REC Contracts for both Illinois Shines and ILSFA Program: [click here](#). This Request for Stakeholder Comments is to seek feedback on the 2026 Draft REC Contracts posted, specifically:

- 2026 Draft ABP 15-year REC Contract;
- 2026 Draft ABP 20-year REC Contract; and
- 2026 Draft ILSFA (Utility-counterparty) REC Contract.¹

Responses are due by May 1, 2026, and should be sent to IPA.Solar@illinois.gov with the subject line “[Stakeholder Name] - 2026 REC Contract Feedback.”

- Please provide telephone and email contact information in the event that the Agency or its Program Administrator(s) seek clarification regarding your comments.

¹ The ILSFA (IPA-counterparty) REC Contract is not provided for comments, but comments adopted through this process will be incorporated into the ILSFA (IPA-counterparty) REC Contract where applicable

- Each of your comments must be clearly indicated by tracked changes to the Microsoft Word version of the draft contract. We strongly encourage you to provide explanatory notes either in a separate document or highlighted in tracked changes.

The Agency plans to finalize and publish the contracts for use under the Illinois Shines Program and the Illinois Solar for All Program for the program year that starts June 1, 2026.

Comments received in accordance with the process outlined below will be reviewed by representatives from the IPA, the Illinois Shines Program Administrator (Energy Solutions), the ILSFA Program Administrator (Elevate Energy), Ameren Illinois Company, Commonwealth Edison Company, MidAmerican Energy Company, Staff of the ICC, and the IPA's Procurement Administrator (NERA Economic Consulting).

In general, responses will be made public and published on the Illinois Shines website (<https://illinoisshines.com/>), the ILSFA website (<https://www.illinoisifa.com/>), or the Agency's website (<https://ipa.illinois.gov/>). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and unredacted versions. Independent of that designation, if the Agency or its Procurement Administrator or the Program Administrators determine that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions.

For the convenience of stakeholders and interested parties, below are links that may be relevant:

- 2026 Long-Term Plan as filed on October 20, 2025: [click here](#)
- ICC Order in Docket No. 25-0945 dated February 17, 2026: [click here](#)
- Most recent prior versions of the REC Contracts:
 - Illinois Shines (ABP) REC Contracts – 2024 version: [click here](#)
 - ILSFA REC Contracts – 2024 version: [click here](#)

For the convenience of stakeholders and interested parties, Appendix A provides a summary of key changes proposed in the draft 2026 REC Contracts. Should you have any questions or need additional information, please contact Lisa Koerner at Lisa.Koerner@illinois.gov.

Appendix A

Summary of Key Modifications to the REC Contracts

For the convenience of stakeholders and interested parties, redline documents showing the proposed changes against the applicable 2024 REC Contracts (i.e., the latest version of the applicable REC Contract currently in use) are available here: [click here](#).

Additionally, Notes to Draft (“NTD”) have been included to provide the context for the proposed change and to provide the references to the 2026 Long-Term Plan where applicable. These NTDs are provided for informational purposes only during the comment period and will be removed when the REC Contracts are finalized.

This list of changes is provided below for the convenience of interested parties. This list is not exhaustive and interested parties are encouraged to review the draft REC Contract documents in their entirety. Key changes include:

1. **Payment Structure for Small Distributed Generation** changed to 50% paid at Energization, with the remainder to be paid ratably over the subsequent 6-year period. This change is made pursuant to P.A. 104-0458.
2. **Payment Structure for Public School Distributed Generation** changed to 15% paid at Energization, with the remainder to be paid ratably over the subsequent 6-year period. These projects will be placed on the 15-year contract rather than the 20-year contract. This change is made pursuant to P.A. 104-0458.
3. **Community Renewable Energy Generation Project definition** is updated to the new size limit of 10 MW, pursuant to P.A. 104-0458.
4. **Project Labor Agreement Requirement** is added for Community Renewable Energy Generation projects where the aggregate capacity is over 3,000 kW, pursuant to P.A. 104-0458.
5. **Co-location Requirements** are added pursuant to P.A. 104-0458.
6. **Customer-owned Small DG REC Adder** is included pursuant to Section 7.5.3 of the 2026 Long-Term Plan.
7. **Equity Eligible Contractor Category REC Adders** are included pursuant to the Illinois Commerce Commission’s Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with Modifications.
8. **Removal for designated systems submitted to the IPA with an incorrect capacity factor** pursuant to Section 7.11.3 of the 2026 Long-Term Plan.
9. **Removal of designated systems that meet the definition of an “Abandoned Contract.”** The removal mechanism is added pursuant to Section 7.12.4 of the 2026 Long-Term Plan.
10. **Clarification that an interconnection denial is to be treated in the same manner as a delay in interconnection approval for purposes of removal.** The removal mechanism is added pursuant to the Illinois Commerce Commission’s Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with Modifications.
11. **Advance of Capital** requirements related to projects in the Low-Income Single-Family and Small Multifamily Solar sub-program are added pursuant to P.A. 104-0458.

12. **Community Solar First Year Report.** The ILSFA program is reverting back to the submission of a Community Solar First Year Report replacing the requirement of Quarterly Community Solar Reports. This language is added pursuant to the Illinois Commerce Commission's Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with modifications.
13. **Option to withhold Payments for Collateral requirement for Small and Emerging businesses.** Small and Emerging business Approved Vendors participating in ILSFA may request to withhold a portion of their REC payment as Performance Assurance. This language is added pursuant to the Illinois Commerce Commission's Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with modifications.
14. **Contract Price for Master-Meter Income-Eligible Residential Building Anchor Tenants** was added to the ILSFA REC Contract. The Anchor Tenant Contract Price shall be the average of the applicable REC price for the Community Driven Community Solar Category under Illinois Shines and the Non-Anchor Tenant Contract price. This language was added pursuant to the Illinois Commerce Commission's Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with modifications.
15. **Addition of language that provides time for Contract assignment in the event of Seller bankruptcy.** This language is added pursuant to the Illinois Commerce Commission's Final Order in Docket 25-0945 approving the 2026 Long-Term Plan with Modifications.
16. **Increased time for Community Solar projects to Energize.** The time to Energization is increased from 24 months to 36 months pursuant to Section 7.11.1 of the 2026 Long-Term Plan.