

Comments of Advanced Energy United concerning the Illinois Power Agency's 2026 Long-Term Renewable Resource Procurement Plan Report – Chapter 10

Introduction:

Advanced Energy United (“United”) respectfully submits these comments related to the Illinois Power Agency’s (“IPA”) request for stakeholder feedback as it prepares to develop its 2026 Long-Term Renewable Resources Procurement Plan (“LTRRPP”).

United is a national trade association that educates, engages, and advocates for policies that allow its member companies to compete to power the economy with 100% clean energy. United is the only national trade association that represents a broad spectrum of clean energy providers and facilitators. Members include front-of-meter and behind-the-meter renewable energy and battery storage manufacturers and developers, electric vehicle (“EV”) and EV charging equipment suppliers, providers of energy efficiency, demand response, and virtual power plants, as well as larger users of energy wanting to ensure that clean energy is available on the grid to facilitate corporate sustainability goals. United works with decision-makers at the federal and state levels of government as well as regulators of energy markets to achieve this goal. The businesses United represents, which include several businesses operating in Illinois, are lowering consumer costs, creating thousands of new jobs every year, and providing the full range of clean, efficient, and reliable energy and transportation solutions.

On May 19, 2025, the IPA issued a request for stakeholder feedback pertaining to the development of the 2026 LTRRPP and specifically focused on six chapters. United’s responses to specific questions relating to Chapter 10: Diversity, Equity, and Inclusion are set forth below. The lack of a response to a specific question should not be construed as support for or acquiescence to a particular aspect or proposal for the LTRRPP. United may develop further positions as the process leading to the 2026 LTRRPP continues. Please send any questions regarding these comments to Brett Sproul at bsproul@advancedenergyunited.org.

Chapter 10: Diversity, Equity, and Inclusion

Topic 1: Barriers to Advance of Capital Use

3. What improvements to the Advance of Capital process would make it more accessible to small or emerging businesses?

The IPA's efforts to ensure that this mechanism only be provided to firms that most need additional capital is reasonable. In support of this, United recommends that this mechanism only be available to firms that are, in addition to other requirements, verifiably "small and emerging businesses" and can meet the federal definitions of such established by the U.S. Small Business Administration. This would help ensure that this mechanism is being applied to businesses that truly need assistance with capital investment.

Topic 5: MES Data Collection and Reporting

3. The IPA is interested in requiring that EEP registration only occur through the Equity Portal to allow for data integrity and consistency, meaning Approved Vendors and Designees would no longer be able to register EEPs through the Illinois Shines MES reporting process. The Agency is interested in hearing any barriers or unintended consequences that may arise for entities as a result of this change

United opposes eliminating the current method allowing AVs to collect the EEP information for the MES year-end report. The industry is aware that some employees are not comfortable with registering or sharing their personal information with the government or IPA directly through the portal, or be listed in the portal at all. Employees trust the relationship with their employer, and the AV should maintain the ability to submit all required information, including the affidavits, to the IPA. If there is additional information or data that the IPA needs to collect through the EEP registration, the IPA should allow AVs to collect and provide this information through the annual reporting.

