ICJC Renewables Subcommittee 2026 LTRRPP Stakeholder Feedback for the IPA

June 11, 2025

Introduction

We, the below-listed Joint Commenters, value the opportunity to provide feedback on the Illinois Power Agency's (IPA or Agency) Request for Stakeholder feedback as the Agency plans to draft the 2026 Long-Term Renewable Resources Procurement Plan (LTRRPP or Plan). Even though the Joint Commenters did not answer all the questions asked by the IPA, this does not exclude us from providing meaningful feedback on the draft Plan when it is available. The Joint Commenters include members of the Illinois Clean Jobs Coalition, however the views in these comments are our own and do not necessarily represent the view of that entire coalition.

Vote Solar	The Nature Conservancy
Citizens Utility Board	A Just Harvest
Union of Concerned Scientists	Environmental Law & Policy Center
Illinois Environmental Council	

Chapter 4

The Joint Commenters elected not to answer the Agency's questions.

Chapter 5

The Joint Commenters elected not to answer the Agency's questions.

Chapter 7

TOPIC 1: Defining Small and Emerging Business - For Possible Use in Advance of Capital, Collateral Refunds, and Minimum Batch Submission Size

Questions:

1. Should Illinois Shines adopt the same definition of "small and emerging business" as Illinois Solar for All? If not, please provide details on an alternative definition.
    a. Yes.
2. What are potential benefits of reducing the initial batch submission size from 100 kW to 25 kW for small and emerging businesses to enhance processing? If this change is not ideal, is there an alternative initial batch submission size that is more appropriate? Please provide additional support to your proposal.
    a. Based on feedback to the IPA that small and emerging businesses have trouble meeting the 100 kW threshold, we do believe that the IPA should reduce the requirement. We do not know what the new minimum should be to increase small business participation, but we request the IPA to reduce the batch size for a program year and then reassess how many additional small businesses were able to participate.

TOPIC 6: Barriers to the Public Schools Category

Questions:

1. What barriers and decision-making challenges do public schools face when exploring the opportunity to install solar and participate in the Illinois Shines program?
    a. All districts have different ways their budgets and approval processes are structured. For example, Chicago Public Schools (CPS) has a budget per school by the number of students enrolled. The ability to do special projects is limited, especially when the school buildings are so old and things like bathroom upgrades need to come first. The person who could make the program happen in a school varies widely across schools - so our target audience widens.
2. What sort of education or outreach would make participation in the Illinois Shines program more accessible to schools?
    a. Principals should be the first target for outreach. In the Chicagoland area, Local School Council leaders manage the budgets of schools. In more rural areas, we have seen that some schools are participating in the Public Schools category. Engaging with these schools can yield some meaningful insights to help increase participation from other schools. Outreach to school boards and/or parent engagement groups like PTA would also increase awareness on the funding opportunities the Illinois Shines program offers.
3. What, if any, additional considerations should be made for Tier 1, Tier 2, and schools located in Environmental Justice Communities? Currently, they have prioritized capacity for part of the Program Year and do not require collateral.

    a. The IPA should build connections with community groups and local school councils (for CPS) to get buy-in on the program and advocate for its adoption.
4. What changes could be made to make the Public Schools category more attractive to developers and schools?
    a. In the past, some members of the ICJC Renewable Subcommittee asked for land adjacent to schools to be allowed for renewable energy construction (for schools that need additional space). Additionally, some schools have voiced their concerns around the 20-year REC delivery. While the Subcommittee has no solution to this, we would like to see if the Agency has any ideas to help schools and school districts concerning the REC delivery contracts.

TOPIC 7: Co-Location Issues Observed
Answer: while the Subcommittee has no direct answers to these questions, we thank the Agency for trying to ensure that utility-size projects attempting to co-locate are identified and are compensated fairly.

Chapter 8

The Joint Commenters elected not to answer the Agency's questions. However, there is a separate group of ICJC members that have submitted Chapter 8 answers.

Chapter 9

TOPIC 1: Solar Restitution Program Vendor Caps and Funding

Questions:

1. Should the vendor cap for the Solar Restitution Program be retained at $200,000, raised to a higher level (and if so, to what dollar amount), or be eliminated entirely?

The vendor cap should be eliminated to ensure harmed customers have the best chance of being made whole through the Solar Restitution Program. Customers should not be penalized by inability to receive maximum, or any, restitution payment, just because there may be several cases tied to a single company.

2. Should the per-project cap be increased for Large Distributed Generation projects? If so, to what amount?

Harmed customers within the Large Distributed Generation (DG) category should have the chance to be made whole, but consumer advocates are concerned about funds being used too quickly, given the fact that pass-through amounts for this category can be in the hundreds of thousands of dollars. We would like the Solar Restitution Program to mainly benefit consumers (rather than large businesses). We ask the Agency to determine what portion of projects seeking funds through this program are Large DG, and to use that information to decide whether or not it is reasonable to increase the cap for Large DG projects. If Large DG projects are only a small portion of harmed customers, raising the cap up to $100,000 seems reasonable. But again, if raising the cap would lead to funds being used mainly for DG projects, we would suggest keeping the cap as is.

3. Should forfeited collateral from utility-scale wind procurements be included as a source of funding for the Solar Restitution Program?

Yes, forfeited collateral from utility-scale wind procurements should be a source of funding for the Solar Restitution Program.

4. What approach (or combination of approaches) should the Agency take if the forfeited collateral runs out?
    a. Options:
        i. tracking but not paying out any additional claims until additional collateral is forfeited,
        ii. using other money in the Renewable Portfolio Standard budget,
        iii. and/or exploring other funding sources.

The Solar Restitution Program has great potential to ensure customers going solar through the Program are protected against a wide range of harm. The success of this program depends on funding availability, so all funding sources should be explored. Option i should be the last resort, only when options ii and iii are eliminated. We support using other money in the Renewable Portfolio Standard budget, but only within reason. The Agency should consider updating stakeholders on how much of the Solar Restitution Program funding has already been used, and what it has been used on. This information could be used to make more specific recommendations regarding the RPS fund.

TOPIC 2: Implementing Program Requirements Related to Solar Loan Financing

Questions:

1. In addition to the concerns described above, are there other consumer protection concerns related to solar financing of which the Agency should be aware?

Consumer advocates have received complaints from solar lease customers who were not aware of the total amount owed, and what the monthly payment would be. Said customers have been told the installation would be free, and they would only pay for the panels themselves. Once lease payments start, these customers would eventually find out that their total monthly payments over the course of their lease deal far exceed the cost of the panels themselves. We would like to see the Agency develop stricter requirements for both lease and PPA offers, and “package deals” that use the same unclear language.

2. Should the Agency require solar financiers who sell financial products for solar projects which are intended to be submitted to Illinois Shines register with the Program?

The Agency should require solar financiers who sell financial products for solar projects to register with the Illinois Shines Program. It is difficult for the Agency to effectively regulate or discipline these entities while they are not required to register with the program. Requiring them to register would increase oversight and create more opportunities for the Agency to resolve and prevent customer complaints and harm.

3. If the Agency requires financiers to register with the Program, should solar financiers be required to complete an application process similar to the application (see Appendix G of the Program Guidebook) that prospective Approved Vendors must complete? Is there any additional information that the Agency should collect in the application process to promote prospective solar financier compliance with Program requirements and safeguard consumer interests?

Yes, financiers should be required to complete an application process similar to the application that prospective Approved Vendors complete. The Agency should also review customer complaints submitted through IL Shines to ensure that financiers mentioned in unresolved consumer complaints go through an additional process before registering with the Program.

4. If the Agency requires financiers to register with the Program, are there other ideas for how the Agency can monitor and enforce Program requirements for solar financiers?

In addition to requiring financiers to register with the Program, the Agency should develop specific marketing guidelines for financiers to ensure that loan offers and packages are marketed in a clear and true way to consumers.

5. Do any of the proposed Program requirements for solar financiers or AVs/Designees listed above raise challenges or concerns?

The main concern is added burden on the Program Administrator. Because many financiers interface directly with customers, we believe that requiring them to register with the Program will greatly improve customer experience and decrease the number of future complaints related to unclear or untrue loan packages/offers.

Chapter 10

TOPIC 4: Energy Workforce Equity Portal Improvements

Questions:

1. What enhancements to the Equity Portal would improve its effectiveness in helping EEPs find employment opportunities in the clean energy sector?
    - Ensure proper integration of DCEO's CEJA programming data into the Equity Portal for the usage of job seekers. EEPs would benefit from knowing what grants are available from the DCEO and other entities so they can build and operate their own projects. Access to ILSFA, IL Shines, and other grants in the clean energy sector would prepare them and employers to build up a project. Employers could reach out with a grant-funded project on the Equity Portal o fulfill their MES requirements. Sharing the contact information of CEJA Navigators would best integrate and control the flow of information to CEJA Workforce training programs.
2. Conversely, what changes or features would make it easier for clean energy companies to connect with and hire EEPs?
    - Ensure proper integration of DCEO's CEJA programming data into the Equity Portal for the usage of employers. Having updated information about CEJA Hubs and what type of trainees they have graduated would be beneficial as a source of information for employers seeking to increase their capacity but have limited reach into where to look. Job seekers need to know what opportunities exist for them in the clean energy sector and CEJA Hub training information would let them know their options for training and check their eligibility. Sharing the contact information of CEJA Navigators would best integrate and control the flow of information to CEJA Workforce training programs.

TOPIC 5: MES Data Collection and Reporting

Questions:

1. In addition to workforce demographic information (race, gender), geographic information, and employment classification information, are there other workforce characteristics or data that the IPA should collect and monitor?
    a. Given that the MES Compliance Plans, Mid-year Reports, and Year-end Reports are required by statute, are there other ways the Agency could streamline data collection on these topics?
        - In addition to the valuable demographic information already collected by the IPA, the IPA should collect and monitor other workforce characteristics and data, such as employees' age and average commute times. Understanding the age demographics of those working in the clean energy sector allows organizations to understand if there are gaps in outreach efforts for crucial populations to integrate into the workforce. Through the data collection of commute times, we could better understand if geographic barriers exist to workers' access to clean energy projects.

2. The Agency is in the process of planning a DEI Data Dashboard to be published on the Equity Portal. Metrics such as number of EEPs, Clean Energy Companies, and Job Postings registered through the Equity Portal will be highlighted, as well as data points sourced from the Shines program's Compliance Plans, Mid-Year Reports, and Year-End Reports. What other data metrics would be useful for our stakeholders to be able to access through this public facing dashboard?
    - It would be helpful for stakeholders to have this information on the DEI Data Dashboard organized by county boundaries and the 10 economic development regions to better align with other workforce data gathered by the state. This allows stakeholders to conduct a more thorough analysis to understand and contextualize the data gathered on the DEI Data Dashboard.
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.
    - Should the IPA require EEP registration only through the Equity Portal, those already registered through the Illinois Shines MES reporting process should be grandfathered in and keep their EEP status. Additional information should be provided to current EEPs, informing them of the new change alongside a transition period to allow the flow of information to reach stakeholders regarding this registration change.

Other Concerns from Joint Commenters

It has come to the attention of the Joint Commenters, that there are downstate communities working to pair their opt-out municipal aggregations with new solar development to meet their climate goals. Additionally, these communities want to help customers lower costs that have been unable to find a REC product that is the right fit for their projects. Such projects may be smaller than many typical utility-scale projects and the communities involved also may proactively desire to set the projects up with some mechanisms typically reserved for community solar projects (e.g. crediting onto a customers bill as well as some of the consumer-facing disclosures). At the same time, there are important distinctions from a typical community solar project - most notably not needing RECs that compensate for high customer acquisition costs. Furthermore, the LTRRPP prohibits opt-out municipal aggregations from participating in traditional community solar without turning themselves into opt-in programs.

In theory, there should be a way to marry our REC programs and opt-out municipal aggregation that furthers both individual communities' and the state's climate goals, potentially at lower and/or more certain REC prices than exist today. Likely, stakeholders need further exploration of how this would work and the impacts, but investment in such exploration does not make sense for communities and projects if the Plan does not provide a path to actualize any recommendations coming out of such an exploration. Likewise, investment in any exploration on the part of the IPA would not make sense without an actual project interested in and willing to work with the IPA on this sort of unique REC product.

With this in mind, the Joint Commenters recommend the Plan acknowledge this opportunity and provide an optional path for some sort of pilot or stakeholder process to figure out what it would take to make the theory of marrying opt-out muni-agg and Illinois REC programs work in practice. Such a process need not take place if no interested and willing community emerges and could result in a narrow petition to reopen the Plan to allow for any agreed upon, necessary changes to enable such a REC product.