Comments of Advanced Energy United concerning the Illinois Power Agency's 2026 Long-Term Renewable Resource Procurement Plan Report – Chapter 7

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 7: Illinois Shines 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 7: Illinois Shines

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

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.

In the interest of promoting consistency and ease of implementation, United supports using the current U.S. Small Business Administration definitions of "small" and "emerging" businesses in both the Illinois Solar for All and Illinois Shines programs.

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.

For those that qualify as "small" and/or "emerging" businesses, United supports reducing the initial batch size from 100 kW in the interest of supporting new market entrants. How much of a reduction is warranted, however, is not certain. A submission of 25 kW could be just one or two projects. Whatever the minimum batch size is reduced to, it may also be worth considering whether the minimum size should be reduced for more than just the initial batch submitted by a small or emerging business. Reducing the size of the first few batch submissions may be warranted since it may take longer for some small and emerging business to establish themselves.

Topic 2: Community-Driven Community Solar (CDSCS) Developer Cap

1. Given the information above, and assuming the Group A and Group B block sizes will remain fairly consistent with the 2024 Long-Term Plan, what are the advantages and risks of establishing a developer cap process for CDCS consistent with the other categories?

United generally believes that a developer cap is unwarranted in this instance, echoing the comments of other stakeholders stating that there is already limited capacity size within the Community-Drive Community Solar program. Despite the potential benefit of

possible increased diversity amongst the developers being awarded capacity within the program, one of the main drawbacks of implementing a developer cap is the risk of insufficient total capacity being awarded to developers.

2. If a developer cap process for CDCS is appropriate, should the threshold be set at 20% or is there an alternative percentage that should be considered? Please provide any reasoning to support a different percentage level, if possible.

If a cap is to be implemented, the percentage level should be based on existing data from previous capacity awards to better understand the awarded allocation between vendors. The percentage developer cap should also be set at a level to both increase developer diversity, but not hinder the total aggregate awarded capacity.

Topic 3: Opt-In Batching for Community Solar Projects

1. Should the Agency establish an opt-in process for all community solar projects that are eligible for batching? Why or why not?

United generally agrees with the IPA's statements that an "opt-in" batching process will help ensure that only community solar projects that are truly ready are moving forward with the process. Adopting this refinement will help reduce administrative burdens due to fewer community solar developers making batching hold requests. This practice should also alleviate burdens on the utility-side regarding the organization of interconnection timelines and processes.

2. Should there be a time limit for how long community solar projects can remain on the opt-out list? If so, for how long?

Generally, a time limit for how long community solar projects can remain on an "opt-out" list seems reasonable. Any such limit should be developed through close communication with community solar developers in order to properly understand the current development challenges and typical timeframe before being ready for batching. Furthermore, if an "opt-in" practice is adopted, it is critically important that this new practice is clearly communicated to community solar developers who are

involved with the batching process, to ensure that they are aware of the changes and are able to properly "opt-in" as needed.

Topic 4: ICC Memo Withhold and Editing Issues & Related Possible Solutions

1. What would be the effect and/or benefits of once again requiring an executed interconnection agreement in the Part I application for community solar projects? Please provide details to support your response.

Requiring an executed interconnection agreement is a reasonable requirement to ensure that projects will be "shovel-ready" and able to be constructed in a timely manner. Experience shows that possession of an interconnection agreement will result in a more successful program for Illinois. If any changes are made regarding this requirement, it is critically important that this new requirement is clearly communicated to community solar developers, to ensure that they are aware of the changes and are able to obtain and submit an executed interconnection agreement.

Topic 5: Support for Abandoned Contracts

1. Is there value to the Agency developing solutions to manage this issue given this challenge is primarily between an Approved Vendor and their customers? Please explain.

Understanding that this issue will continue to occur in the future and given the multitude of reasons that a project may be abandoned, United recommends that the IPA convene a technical working group focused on identifying the commonalties among abandoned projects and the seriousness of the impact. The working group should be open to all interested stakeholders but ideally will obtain input from solar developers and approved vendors with direct experience with this problem. Only after developing a solid base of information should anyone attempt to develop solutions.

Topic 6: Barriers to the Public Schools Category

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?

Rather than participate in the public schools block, some public schools prefer to participate in the large distributed generation block because the renewable energy credit payments are provided at the outset of the delivery contract instead of over 20 years. Although the payments under the public schools block may be higher, the financial situation of some schools may result in a situation where a smaller nearer term payment can be more attractive than a larger longer-term payment. United recognizes that a statutory change would be necessary to remedy this particular challenge to participation in the public schools block.

Topic 9: Federal Policy/Tariffs

1. What have been the impacts of the tariffs recently announced by the federal government on business operations of Illinois Shines participants?

It is well understood that the implementation of broad trade tariffs on foreign imports has a significant cost impact on domestic industries due to the fact that anything that is purchased from a foreign country has an increased cost that is ultimately borne by the consumer. Primary impacts include supply chain uncertainty, cost volatility, and investment planning disruption. Solar, battery and wind energy development is a part of a globally interconnected supply chain, and therefore tariffs that are implemented on foreign countries will increase the cost of goods purchased to develop solar and wind projects domestically. This will greatly impact the financial feasibility of projects and could greatly reduce the number of projects, particularly those in the development stage. As a trade association representing multiple renewable energy developers, including many who operate in Illinois, United stresses that federal tariffs will likely impact all facets of future projects in Illinois.

4. Should the Program consider making changes to account for potential or existing tariff change effects on business operations and costs? If yes, please explain what changes to make, through which elements of the Program, and how such changes would support project development and pricing.

The Program should ensure the ability to adjust REC pricing as needed between LTRRPP approvals. This is in light of the severe shifts that may be caused by Federal tariff policies that are changing quickly.