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**Subject:** [External] Mark Burger Chapter 7 LTP Feedback  
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On May 19, 2025, the Illinois Power Agency (IPA) issued a request for stakeholder feedback as the Agency prepares to develop its 2026 Long-Term Renewable Resources Procurement Plan. The following feedback refers to Chapter 7: Illinois Shines.

Community Driven Community Solar (CDCS) is a critical and useful sub-program that addresses geographic inequity and, paired with other programs like the Federal Inflation Reduction Act Investment Tax Credit Low Income Bonus or the Illinois Finance Authority, can also reduce economic inequity by targeting counties and their communities with significant low and moderate income (LMI) households.

To further improve the efficacy of the CDCS sub-program, if a higher priority of funding beyond 5% of Illinois Shines cannot be allocated, then the CDCS needs a higher priority of access to funds of sub-programs that are not being allocated. CDCS is one of the last categories to be considered. Furthermore, while Illinois Shines is specified as a “market-rate” program, consideration should be given for CDCS projects that have specific allocations to LMI households and communities through other sources, that allocations may be taken from Illinois Solar For All sub-programs that are not spending their allocations. This may be justified because the CDCS category does require developers to share a portion of the state incentives they receive with partners in the form of equity in workforce development, green energy education, and direct contributions.

CDCS projects lined up and ready to go cannot get approval because the capacity allocated to that program is minimal, with little flexibility in sub-program reallocation. They are unfortunately placed on waitlists, sometimes for years. This is a source of frustration because the CDCS is the Illinois Shines category of projects that is designed specifically to provide access for very localized benefits to communities in which projects are constructed. This is particularly the case in the Northeastern Illinois counties.

It is requested that the IPA improve consideration of the CDCS when determining how they will allocate new and unused capacity. And, that the state makes it easier to bring projects online quickly by removing barriers to project approval and construction. It is further requested that greater flexibility be available to projects in the Northeastern Illinois counties where there may be disparity of township locations that may have projects using LMI incentives, but insufficient LMI populations in the township, causing an imbalance of subscriber locality and LMI eligibility with the remainder of the county.

Another request is that higher priority is given in scoring for CDCS projects that are more specifically sited on rooftop and other hard surface locations, which will enable better access for more urban, developed and LMI communities in the Northeast Illinois counties. The CDCS sub-program merits more official consideration that will benefit non-profit organizations, businesses, and residents in Cook, DuPage, Kane, McHenry Will and Lake Counties.