June 9, 2025

TO: Illinois Power Agency

FR: Climate Jobs Illinois (CJI)

RE: May 19 Request for Stakeholder Feedback on the IPA's 2026 Long-Term Renewable Resources Procurement Plan

Please direct questions and comments to:

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About Us

Climate Jobs Illinois is a coalition of labor organizations advocating for a pro-worker, pro-climate agenda in Illinois. Our mission is to advocate for a clean energy economy at the scale climate science demands, create good union jobs and support more equitable communities. Our coalition represents hundreds of thousands of Illinois working men and women who are the best trained and skilled to build Illinois' new clean-energy economy from the ground up. By focusing on the construction of clean energy sources as a way to combat the climate crisis, Climate Jobs Illinois offers a compelling new approach to creating an equitable and clean economy. Building a clean energy economy is an opportunity for labor to lead on climate by creating high-quality family-sustaining jobs that spur economic development while reducing carbon emissions.

Climate Jobs Illinois is a state affiliate of the Climate Jobs National Resource Center. Climate Jobs Illinois is directed by a coalition representing hundreds of thousands of union members across Illinois, and our Executive Committee is comprised of leadership from:

- Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Union Chicago & St. Louis
- Mid-American Carpenters Regional Council
- International Brotherhood of Electrical Workers Local 134
- International Brotherhood of Electrical Workers State Council
- Illinois Education Association
- Illinois Federation of Teachers
- International Union of Operating Engineers Local 150
- Midwest Region of Laborers International Union of North America
- Great Lakes Region Laborers International Union of North America
- Illinois Pipe Trade Association
- International Association of Heat and Frost Insulators and Allied Workers

Background

On May 19, the Illinois Power Agency (IPA) posted a series of Requests for Feedback on Chapter 7 of the IPA's 2026 Long-Term Renewable Resources Procurement Plan. On behalf of our coalition members and their rank-and-file union members, Climate Jobs Illinois submits the following recommendations for Chapter 7, which pertain to clean energy labor standards and solar power incentives for public schools.

Chapter 7: Illinois Shines

Topic 6: Barriers to the Public Schools Category

What barriers and decision-making challenges do public schools face when exploring the opportunity to install solar and participate in the Illinois Shines program?

Response: Interconnection delays and associated fees (especially for school districts receiving electricity from a municipal or cooperative utility) are a major obstacle for public schools that are interested in installing solar. We have heard multiple complaints from individual school districts as well as the Illinois School Superintendent's Association about this issue. When solar projects stall out due to interconnection delays or additional fees, this erodes trust in the concept of solar on schools and the Illinois Shines Program.

Public schools also require a longer runway to accommodate the bureaucratic steps necessary to adopt solar. School districts are not as nimble as private solar developers, and therefore require additional time for multi-year capital planning, school board approvals, and bond referendums. The Public Schools block was created with the intention of creating a new solar market for Illinois school districts, and it will take time to develop that new market. We must ensure that these REC incentives are available when school districts are ready to participate in the program fully.

Public schools could benefit from additional flexibility when it comes to disbursement of REC payments through the Illinois Shines program. Currently, REC contracts for public schools last 20 years, compared to 15 years in most other program blocks. Shortening the REC contract would help schools capitalize REC incentives early on, providing stability in the absence of federal energy tax credits and improving participation in the program.

What sort of education or outreach would make participation in the Illinois Shines program more accessible to schools?

Response: Renewable Energy Credits are a new concept for most school leaders, and we have heard from many administrators who are confused and intimidated by the Illinois Shines application process. Many more were unaware of the program altogether. There is also great uncertainty around the future of the Inflation Reduction Act's direct-pay tax credits, which had helped schools recoup 30-50% of installation costs.

The Public Schools block is one of the newest additions to the Adjustable Block Program, and many schools are still considering the budgetary impacts of solar installation. School construction is typically financed through a combination of revenue bonds, annual capital funds approved by the school board, and grant funding. Most school districts also rely on multi-year capital plans and are subject to strict procurement standards.

The IPA should dedicate additional resources to educate school districts about the Illinois Shines program and provide technical assistance to help improve participation in this category. This could include webinars, how-to guides, project planning services, a partnership with the Illinois State Board of Education, an announcement from the Governor's office, and a briefing for state legislators. The

IPA should also take steps to target these resources to Tier 1 and Tier 2 schools, and schools located within Environmental Justice communities.

What changes could be made to make the Public Schools category more attractive to developers and schools?

Response: Whenever possible, we encourage the IPA to shorten REC contracts in the Public Schools category from 20 years to 15 years. Legislation was introduced in the state legislature this Spring that would have given the IPA authority to adjust REC contracts during the Long-Term planning process. Shortening the REC contract for public schools to 15 years balances fiscal responsibility with robust support for solar adoption—aligning incentive payments with school financing structures, market realities, and the period of strongest system performance, while freeing up IPA resources for broader program impact.

Most public-sector solar installations are debt-financed over 10 to 15 years. A 15-year REC contract matches the typical loan term, ensuring REC revenues cover debt service without leaving schools (and ultimately the IPA) exposed to performance or market risk once financing ends. Shorter contracts also release program dollars back into the budget sooner, allowing the IPA to reallocate savings to additional solar projects, particularly in underserved or equity-focused subprograms. Altogether, a 15-year term would improve cost-effectiveness, risk management, and equitable solar deployment.

Topic 7: Co-Location Issues Observed

How can the Agency ensure that co-location determinations properly ensure that 1) REC prices are being consistently adjusted to the aggregate size of co-located projects, 2) interconnection queues are not clogged, and 3) ensure compliance with labor requirements for projects over 5MW?

Response: Our coalition has made IPA aware of multiple solar projects that appear to be in violation of IPA's regulations regarding co-location and requirements for project labor agreements. We also participated in extended negotiations with IPA and the solar industry during the legislative session to discourage REC price manipulation and PLA avoidance though improper co-location. By closing loopholes around co-location sizing and reinforcing labor compliance, the IPA can protect ratepayers and workers while creating good jobs across Illinois. We look forward to continued collaboration with the IPA on this important issue, and we are happy to provide any data or expertise needed to strengthen the program's co-location guidance.

The Program currently requires the following information through its Part I and Part II application process used for co-location determination: property information (name, company, address, parcel number), proof of site control, plot diagram or site map, Interconnection Agreement or Certificate of Completion/Permission to Operate, self-identification of previous applications on the same parcel, project ownership information (name, company, address, contact information), and additional information as proof of non-affiliation for projects in the same or adjacent parcels separately requested. What additional documentation is available and/or should be requested by the Agency to ensure compliance with co-location requirements?

Response: We encourage the IPA to collect attestations from solar developers for prevailing wage compliance on all projects, as well as project labor compliance for co-located projects found to be greater than 5MW in aggregate size.