COMMENTS ON THE DRAFT LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN ON BEHALF OF SOLAR LANDSCAPE

June 11, 2025

Introduction

Solar Landscape appreciates the Illinois Power Agency's ("IPA") continued dedication to developing the 2026 Long-Term Renewable Resources Procurement Plan ("LTRRPP") and the opportunity to comment. These comments reflect Solar Landscape's experience as an active participant in the Illinois Shines program, particularly within the Community-Driven Community Solar ("CDCS") project category, and our ongoing work to expand equitable access to clean energy across Illinois.

Solar Landscape is the leading national developer of commercial and industrial rooftop solar projects. Our commitment to Illinois' local workforce development, educational partnerships, and collaboration with community-based organizations ensures that CDCS projects deliver tangible, lasting benefits. This focus on community impact is central to every project we complete under Illinois Shines.

We support the IPA's LTRRPP process and commend its stakeholder engagement process. Our comments below focus on areas most relevant to our CDCS experience and offer targeted recommendations to advance the goals of CEJA and FEJA.

General Comments

CDCS Prioritization in Waitlist Capacity Allocations

We strongly encourage the IPA to prioritize CDCS at the top of the waitlist for Uncontracted Capacity at the end of a program year.

Though CDCS represents the most equitable and community-focused category in Illinois Shines, it currently receives the smallest MW allocation. This contradicts the core intent of CEJA and FEJA, which prioritize community empowerment and equitable clean energy access.

CDCS projects are uniquely structured to serve entire communities, not just individual property owners. Developers engage directly with schools, nonprofits, and local stakeholders to tailor benefits for the neighborhoods they serve. Unlike Small and Large Distributed Generation (DG) solar projects, which primarily serve a single offtaker, CDCS projects democratize access to solar energy and meaningfully contribute to workforce development, educational programming, and long-term economic opportunity.

While Tier 1 procurements have gone underfilled, shovel-ready CDCS projects remain waitlisted, despite offering greater capacity and stronger alignment with CEJA objectives. Prioritizing CDCS would accelerate these high-impact projects and ensure that historically underserved communities benefit early and continuously from the energy transition.

Subscription Transfer within Approved Vendor Portfolios

We recommend policy changes that would allow Approved Vendors (AV) to transfer subscribers between CDCS projects serving the same community, while maintaining discount rates. This would protect subscribers from being stranded due to vendor withdrawal, reduce service disruptions, and accelerate access to clean energy savings.

Rooftop Community Solar Adder for CDCS Projects

We commend the Illinois Power Agency for its decision in the 2024 Long-Term Plan to establish a $5.00/REC rooftop adder for Traditional Community Solar projects. This step appropriately recognizes the elevated costs associated with rooftop solar, particularly in urban areas where prevailing wage requirements, construction complexity, and site-leasing rates are significantly higher. **We urge the Agency to extend this rooftop adder to Community-Driven Community Solar (CDCS) projects as well.** Rooftop CDCS projects face the same cost pressures and production constraints—such as fixed-tilt arrays and higher site lease rates—as other rooftop installations under Illinois Shines. Rooftop CDCS projects also offer distinct public benefits: they avoid additional grid infrastructure costs, can be deployed more quickly, and reduce land-use conflicts, especially in densely populated areas.

Because CDCS projects are required to pass through a portion of the REC value to the community, increasing REC compensation for rooftop CDCS directly increases the financial benefit delivered to historically underserved urban communities. While some rooftop CDCS projects may succeed without the adder, many more—especially in higher-cost markets—will be viable if this incentive is extended.

Responses to Chapter 7 Topics for Stakeholder Feedback

Topic 2: Community-Driven Community Solar Developer Cap

We urge the Agency to continue to reject a developer cap for CDCS projects.

In the 2024 Draft Long-Term Plan, the IPA proposed a 20% developer cap, but ultimately rejected it after extensive stakeholder input. **We commend that decision and believe it remains appropriate.**

The implementation of a developer cap in the CDCS category would result in significant underutilization of available capacity, limiting project deployment in the very category designed to deliver the greatest community benefits. In Group A, five developers submitted either awarded or waitlisted projects in the 2024–2025 Program Year. A 20% cap based on last year's total allocation of 13.78 MW (originally 11 MW) would limit each developer to just 2.8 MW—smaller than the average CDCS project size of 2.9 MW, based on the IPA's published figures. Under the original 11 MW capacity, the cap would drop to just 2.2 MW. Two awarded projects would have been disqualified due to their size, and four waitlisted projects—including the two highest-ranked—would also be ineligible, as their addition would push developers beyond the cap. With no eligible projects left to backfill the capacity, this would leave approximately 8 MW in Group A unallocated.

A similar outcome would occur in Group B, where four developers submitted awarded or waitlisted projects. A 20% cap based on the adjusted 31.48 MW capacity (originally 25 MW) would limit each developer to 6.2 MW (or 5 MW under the original figure). Applying this restriction would disqualify 5.99 MW AC of 2024 waitlisted projects, despite the fact that 12 MW AC would remain unallocated. Because the remaining waitlisted projects all belong to developers who would be at or above the cap, that capacity would remain unused. In total, a 20% developer cap would have left 20 MW unallocated in the most community-beneficial category of the Illinois Shines Program during the 2024–2025 Program Year. These figures underscore the risk of caps that constrain high-quality projects and prevent the Program from fully meeting its statutory and equity-driven objectives. It would stall project delivery, disrupt community partnerships, and deny timely benefits to local residents.

CDCS projects require substantial up-front investment in community engagement, relationship building, and workforce partnerships. Developers who invest in these relationships over time need

predictability and the ability to scale within the Program. Arbitrary caps force communities to wait, even when capacity remains available.

Many current waitlisted projects range from 3–5 MW and comply fully with Program rules. Capping developers below this threshold would strand viable capacity and discourage participation in the Program's most community-oriented category.

Additionally, while we recognize the requirement to increase capacity for Equity Eligible Contractors, downsizing CDCS to achieve EEC goals is counterproductive. CDCS already operates at smaller project scales and with tighter margins. Pulling from the CDCS category would disproportionately harm the very communities CEJA was designed to uplift.

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

We support the IPA's concern about infeasible projects occupying space in the interconnection queue.

If the Agency does decide to introduce any additional project maturity requirements, we advocate those new requirements be paired with enhanced REC incentives, opportunities for deadline extensions in the event of utility delays beyond developers' control, and more flexible collateral deadlines to avoid discouraging viable early-stage projects.

We strongly oppose requiring interconnection during the Part 1 application process. This would create a first-come, first-served structure favoring projects already in the queue, and utilities would have little incentive to process new community solar applications promptly.

Such a requirement would also drive geographic clustering, with projects concentrated in areas where interconnection is fastest—leaving other communities behind. This outcome conflicts with CEJA and FEJA's aim of broad, statewide renewable energy benefits.

Illinois utilities require interconnection applicants to pay for service and upgrade costs within 15 business days of applying. This favors large developers with the cash to meet these upfront costs, while excluding smaller developers who lack the same liquidity. Given the large upfront cost, interconnection often requires debt or equity financing that becomes available only after a project gains greater certainty—such as receiving a program award.

If an executed interconnection agreement becomes a requirement, we urge that projects already on the waitlist be grandfathered under the prior rules. These projects complied with the original requirements and should not be penalized retroactively. Many projects have moved forward in development without interconnection agreements; changing the rules now would inject new uncertainty and make financing far more difficult.

Topic 5: Support for Abandoned Contracts

As the Program matures, abandoned contracts due to customer relocation or ownership changes will become more frequent. While this has mostly impacted residential DG to date, the Agency should act now to prevent future disruptions in CDCS and small business projects.

We recommend the Agency provide guidance for how AVs can manage abandoned contracts. These situations are often outside the vendor's control, and a lack of clear protocols complicates recovery or reassignment.

To that end, we recommend: allowing AVs to transfer subscribers to other projects serving the same community; enabling subscriber replacements without penalty when customers move or shut down operations; and exploring contract language that anticipates common scenarios like tenant turnover or commercial site repurposing. This would provide a smoother experience for customers and AVs alike, while preserving project economics and long-term REC obligations.

Topic 7: Co-Location Issues Observed

We appreciate the Agency's efforts to prevent gaming of REC pricing and labor requirements through parcel manipulation in the pre-development phase. **However, we urge the IPA to maintain the existing rooftop exclusion from co-location restrictions.**

Rooftop projects are limited by building size and lack the economies of scale seen in ground-mounted systems. Nearby rooftop systems often involve separate owners, distinct construction scopes, and individual community benefits. Grouping rooftops under a single co-location determination is both administratively burdensome and economically unjustified.

We commend the IPA's 2024 decision to exempt rooftops and encourage its continuation. The concerns addressed in this section—queue congestion, REC gaming, and labor circumvention—are relevant for large, ground-mounted arrays, not rooftops.

In light of possible upcoming legislation, the 2026 Long-Term Plan should clarify that co-location provisions proposed in the Energy Storage Omnibus Bill (SB 040, HAM 6) do not apply to projects outside the Adjustable Block Program (ABP) and will not restrict ABP projects from co-locating with other non-ABP projects. Approved Vendors should identify in their Part I application whether a project is co-located with an existing Illinois Shines project and, where possible, include the Application ID or project name for reference.

Additionally, the Long-Term Plan should reaffirm that rooftop co-location continues to be governed by the existing Program Guidebook. Specifically, community solar systems installed on

separate rooftops or structures on adjacent parcels should not be considered co-located unless they are located on the same building or structure. This clarification is critical to avoid confusion during application review and to ensure rooftop development remains feasible under current siting rules.

Q4: Challenges of Single Points of Interconnection

We understand the Agency's concern regarding potential queue congestion caused by multiple interconnection requests in the same area, particularly from a single developer. **While a shared Point of Interconnection (POI) across adjacent or nearby sites may appear efficient, this approach is often limited by a combination of technical, legal, and programmatic constraints.**

Electrical infrastructure limitations, such as differences in feeder lines, substation capacity, or voltage class, can make a single POI infeasible, even for geographically proximate projects. Cost and logistical considerations also play a role, as shared POIs typically require higher-rated equipment, longer trenching distances, and more complex installations, which increase both project costs and timelines, especially in a constrained labor or equipment market. Zoning and permitting barriers further complicate consolidation efforts - when interconnection infrastructure crosses parcel lines, it often triggers additional land-use approvals, variances, or public hearings that can significantly delay project timelines and introduce legal risk.

In our view, the use of multiple POIs in a given area is not a matter of developer preference but rather a function of real-world constraints. As permitting processes and utility standards evolve, greater coordination may become feasible, but under current conditions, separate interconnection applications remain the most pragmatic and policy-compliant approach.

Topic 9: Federal Policy/Import Tariffs

New solar import tariffs have already increased equipment costs and caused procurement delays for Illinois Shines developers. Price impacts typically follow within 60 days of a tariff announcement, with supply chain disruptions lasting longer.

To mitigate these effects, we recommend allowing AVs to request energization deadline extensions based on verified tariff-related disruptions. This would protect customers and preserve project viability during unforeseen delays.

Conclusion

We reaffirm our strong support for the LTRRPP process and the Illinois Power Agency's leadership in advancing clean, equitable energy in the state. The Illinois Shines Program has become a national model for inclusive solar development, and we appreciate the opportunity to help strengthen its impact through these comments.