



Comments of Advanced Energy United concerning the Illinois Power Agency's 2026 Long-Term Renewable Resource Procurement Plan Report – Chapter 8

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 8: Illinois Solar For All 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 8: Illinois Solar for All

Topic 1: Self-Attestation for Income-Eligible Communities in the Residential Solar (Small) Sub-program

1. Should the Agency expand its use of self-attestation and allow Residential Solar (Small) subprogram participants residing in income-eligible communities, defined as census tracts where at least 50% of residents earn no more than 80% of the AMI, to confirm the household income by attestation without the need of further documentation? Are there any challenges or concerns with this approach?

Yes, the Agency should adopt this self-attestation approach. This is in-line with best practices that maintains privacy and consumer protections, but minimizes barriers for uptake into the Program.

Topic 2: Residential Solar (Small) Sub-program – No-Cost Offers

4. Should the Residential Solar (Small) program be reconfigured to require all offers to be “no cost?” a. If so, what considerations are relevant for different financing models (i.e., no-cost leasing, participant ownership)? Should any adjustments to requirements be included for different financing models? b. Are there any challenges or risks to this approach? Please explain.

The Agency should not require a “no-cost” approach, and instead allow different solutions to materialize to encourage various business models. Fifty percent savings is still a very high value to residents. With new netting and solar billing in Illinois, the IPA should maintain flexibility in models to encourage more vendor participation.

Topic 6: Home Repairs and Upgrades Pilot

17. Do stakeholders agree that continuing the Home Repairs and Upgrades Pilot and offering incentives enabling repairs and upgrades through REC adders is meeting the spirit of the program, as outlined in Section 1-56(b)(2) of the IPA Act?

United strongly supports the continuance of the Home Repair and Upgrades Pilot program as it has shown to be successful and assists in customers’ ability to actively receive benefits from installing a solar system on their property. This program



specifically addresses and helps to resolve an existing barrier which is that some customers are unable to install solar on their property simply because the cost to upgrade their home to accommodate a residential solar system is unaffordable.

18. What adjustments can be made to the Home Repairs and Upgrades Pilot to reinforce the equity and access goals which it is meant to address?

United suggests that the IPA focus on Environmental Justice Communities rather than just low-income customers to further improve the equity and accessibility of the program.

19. Should the Home Repairs and Upgrades Pilot support additional repairs and upgrades beyond electric and roof repairs that help in installing solar photovoltaic systems? If so, what type of work should be included?

While open to covering additional repairs and upgrades as means to improve customers' energy efficiency and making a residential solar installation more beneficial, United would want to consider the cost of expanding the program before taking a definitive position. At a minimum, efforts should be made to stack the program with other non-Illinois Solar for All programs that can improve the efficacy of the benefits under Solar for All.

Topic 9: Job Training Requirements

26. If the current 36- or 24-month requirement is proving to be a challenge to satisfy the job training requirement, should the Agency increase the length of time a "trainee" would be considered as such? If so, for how long?

The IPA Act does not explicitly define who qualifies as a "trainee", however, the 2024 IPA LTRRPP defines "eligible job trainees" as those who complete an eligible training program within 36 months or those who complete 50% of classroom requirements of an "Other Qualifying Program" in the past 24 months. United believes that requiring specific timelines in order to satisfy the job training requirements may be excessively onerous to vendors and companies. If an individual comes from a training program and begins a successful career at a company (maybe even seeing advancement), then that



should be deemed as a successful training placement, regardless of the timeframe. United also echoes the IPA's statements in their request for comments which said that approved vendors have seen a range of skill mastery among job trainees and that the 36- or 24- month requirement does not necessarily equate to having a mastery of the skills. An overly specific timeline could result in quality trainees being "timed-out" at a company because it would be detrimental to hitting required programmatic goals.

