

Comments of Advanced Energy United concerning the Illinois Power Agency's 2026 Long-Term Renewable Resource Procurement Plan Report – Chapter 9

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 9: Consumer Protections 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 9: Consumer Protections

Topic 2: Implementing Program Requirements Related to Solar Loan Financing

1. In addition to the concerns described above, are there other consumer protection concerns related to solar financing of which the Agency should be aware?

United does not object to a registration process for solar loan financiers that participate in the program, nor does United object to additional approved vendor requirements and responsibilities aimed at ensuring a reasonable degree of consumer protection. It is important to remember, however, that any additional requirements must be balanced against the burden they create. While new obligations may protect consumers from (and weed out) bad actors, obligations that are overly burdensome and onerous may compel good actors to leave the market as well. Solar loan financing is a critical part of a healthy renewable energy market in Illinois, and it is important to balance necessary consumer protections with the ability for entities and consumers to fund renewable energy projects within Illinois.

