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## ILLINOIS POWER AGENCY

### Stakeholder Feedback Request for the 2026 Long-Term Plan

#### Chapter 8: Illinois Solar for All

May 19, 2025

The Illinois Power Agency is soliciting feedback on various topics as the Agency develops the 2026 Long-Term Renewable Resources Procurement Plan. Stakeholders are encouraged to review all Agency-provided stakeholder question sets and are invited to provide comments on as many of the question sets of interest to each reviewing stakeholder. Further, comments may go beyond the scope of these specific questions in each set. Responses will be published on the IPA website under the “Plans Under Development” section of the Procurement Plans page. However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions. Independent of that designation, if the Agency or its Program Administrator determine that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions. A draft of the plan will be released for public comment by August 15, 2025.

The Illinois Solar for All Program (“ILSFA” or “the Program”) was created in 2017 through revisions to Section 1-56(b) of the Illinois Power Agency Act contained in P.A. 99-0906, the Future Energy Jobs Act, opened in 2019, and was later updated in 2021 through P.A. 102-0662, the Climate and Equitable Jobs Act. The Program is designed to “include incentives for low-income distributed generation and community solar projects”. The IPA Act details four sub-programs authorized under Section 1-56(b)(2):

- Illinois Solar for All: Residential Solar (Small)
- Illinois Solar for All: Community Solar
- Illinois Solar for All: Non-Profit and Public Facilities
- Illinois Solar for All: Residential Solar (Large)

ILSFA’s REC incentive and project application designs are similarly structured to the Illinois Shines solar incentive program. ILSFA contains additional requirements to be an ILSFA Approved Vendor, additional project application requirements, specific contracts, and requires community involvement, additional consumer protections, and eligibility requirements to participate in the Program.

Chapter 8 of the Long-Term Plan describes the Agency’s design for implementing Illinois Solar for All.

*Please note that the Illinois Power Agency is exploring many ideas and points of view as it considers how to improve its programs, procurements, and operations. The inclusion of an idea or question does not necessarily imply that the IPA intends to take a specific approach in the upcoming Long-Term Plan or otherwise.*

#### **How to Reply**

Please provide comments via email attachment to [IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov) with the subject “[Responder’s Name] – Chapter 8 LTP Feedback” by **June 9, 2025 at 5 p.m. CPT.**

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**ILLINOIS POWER AGENCY****Topics**

1. Self-Attestation for Income-Eligible Communities in the Residential Solar (Small) Sub-program
2. Residential Solar (Small) and Community Solar Sub-program No-Cost Offers
3. Non-Profit and Public Facilities Sub-program Geographic Eligibility
4. Collateral
5. Environmental Justice Communities
6. Home Repairs and Upgrades Pilot
7. Multifamily Buildings
8. Master-Metered Multifamily Buildings in the Community Solar Sub-program
9. Job Training Requirements
10. Residential (Small) Participant Referral Pilot

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

Customer eligibility is partly defined in the Illinois Power Agency Act (“IPA Act”) and further refined in the Long-Term Plan. Section 1-56(b) of the IPA Act, recently updated through P.A. 103-1066 to update income guidelines annually, states:

*“[l]ow-income households” means persons and families whose income does not exceed 80% of area median income, adjusted for family size and revised every year.*

Section 8.10.3.1 of the Long-term Plan explains that the IPA will use income eligibility guidelines from HUD. HUD bases its housing assistance programs on 80% area median income, adjusted for family size. While ILSFA eligibility is also based on 80% area median income, the IPA Act does not define what an *area* means. As such, the IPA also relies on HUD’s definition of an area.

Section 8.10.3.2 of the Long-Term Plan then goes on to explain how ILSFA will conduct income verification:

*For projects that participate in the Residential Solar (Small and Large) sub-programs, verification of income should be done at the household resident level. This can be done several ways.*

*For buildings with between one and four units, household income can be verified by one of the following means:*

- *Review of the most recent federal income tax returns*
- *Income verification through a third-party income verification system*
- *Verification of participation in another income-eligible energy program (such as LIHEAP or state-funded IHWAP), in HUD’s housing assistance programs where the income eligibility standard is 80% of AMI or lower for that participant, or in other benefits programs where the income eligibility limit is 80% of AMI*

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The IPA has previously received comments suggesting streamlining the income verification process and some filings in litigation of the 2024 Long-Term Plan have argued for potential changes, such as the addition of a self-attestation option for income verification. In its Final Order, the Commission determined customers participating in the Bright Neighborhoods Initiative who live within HUD Qualified Census Tracts would have the option of self-attestation for income verification. Additionally, the Final Order directed the IPA to evaluate the practical effect of the expansion of self-attestation and provide a recommendation on whether to incorporate self-attestation in the next Long-Term Plan. Currently, ILSFA allows the option for self-attestation in two instances: (1) for community solar subscribers who reside within an income-eligible community, defined as census tracts where at least 50% of residents earn no more than 80% of the AMI and (2) for customers participating in the Bright Neighborhoods Initiative who reside in a HUD Qualified Census Tract, where at least 50% of residents earn no more than 60% of the AMI.

The IPA has found that income verification is still proving to be a challenge for Approved Vendors and participants. In the 2024-2025 Program Year to-date, the Bright Neighborhoods Initiative completed income verification for a total of 25 applicants. Fourteen were deemed to be income eligible. Of those, five of the participants were income verified through the self-attestation option. The ILSFA Program Administrator noted that self-attestation is a much simpler and condensed process, where participants were able to complete income verification within a few days. All five of the participants who used the self-attestation option were deemed to be income eligible. As such, the Agency is considering expanding implementation of the option of self-attestation for residents of income-eligible communities for income verification purposes to the entire Residential Solar (Small) sub-program.

After evaluating the practical effect of self-attestation in the Bright Neighborhoods Initiative, the Agency seeks stakeholder feedback about expanding the option of self-attestation in the Residential Solar (Small) sub-program where the participant resides in an income-eligible community, defined as census tracts where at least 50% of residents earn no more than 80% of the AMI. This process would allow participants to provide a signed affidavit attesting that they satisfy income eligibility. A single map identifying income-eligible communities that is currently utilized for determining eligible areas for self-attestation in the ILSFA Community Solar sub-program would be utilized for the Residential (Small) sub-program as well.

However, since ILSFA provides greater REC incentives and higher savings for participants than that of comparable programs utilizing self-attestation, the Agency also seeks feedback on an audit process to ensure ILSFA's income eligibility standards are upheld. The Agency is considering selecting a random set of projects using a random selection generator program, and the households served by those projects would be required to document their income for verification prior to Part I approval. The IPA is open to recommendations detailing suggested parameters for the audit process to a proposed expansion of the self-attestation verification option.

### Questions

1. Should the Agency expand its use of self-attestation and allow Residential Solar (Small) sub-program 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 their

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- household income by attestation without the need of further documentation? Are there any challenges or concerns with this approach?
2. Should the IPA only expand self-attestation to residents in income-eligible communities or should the option be extended to environmental justice communities as well? Or should self-attestation only be offered in HUD Qualified Census Tracts, which represent fewer communities but a higher portion of residents meet income eligibility?
  3. The Agency requests feedback on suggested parameters and structures for an income verification audit process. What policies, procedures, and guidelines should the Agency consider when developing the criteria of the audit? What methodology should be employed when defining the number of households being randomly selected to audit?

**TOPIC 2: Residential Solar (Small) Sub-program – No-Cost Offers**Background

Section 8.2.2 of the Long-Term Plan states:

*to create “tangible economic benefits” at a “reasonable” level, the Agency has determined that eligible residential participants in the Illinois Solar for All Program should not have to pay up-front costs for on-site distributed generation or pay an up-front fee to subscribe to community solar. Further, participation in the Program should result in immediate, reliable reductions in energy costs for those residents or subscribers. Consistent with the Commission’s Order in Docket No. 17-0838, for projects that are financed or leased, any ongoing annual payments must be no more than 50% of the energy value received by the customer.*

The Illinois Solar for All savings requirement is designed to ensure ILSFA participants see savings on their electricity bill. However, the Residential Solar (Small) sub-program continues to face challenges in customer trust, complexity in savings calculations, and Approved Vendors’ ability to finance projects. While participation in the Residential Solar (Small) sub-program shows signs of improvement over the past two years, the sub-program has not met its full budgetary potential, and the Bright Neighborhoods Initiative proved to be unsuccessful in implementing alternative customer acquisition strategies. In an effort to improve customer understanding of the program opportunities, and increase both transparency and simplicity of the program, the Agency is considering proposing to change the savings requirement for the sub-program to require “no-cost” offers. By standardizing the sub-program to no-cost offers, the Agency hopes to increase customer understanding and trust of ILSFA and allow the Program Administrator to focus on increased marketing and communications related to the sub-program to be better aligned with its original legislative intent.

This change could also ameliorate the additional complexity caused by changes to net metering. The new compensation for residential and small commercial customers in ComEd, Ameren, and MidAmerican territories in 2025 has bifurcated the value of solar between onsite consumption (which can be valued at the full retail rate, since it offsets electricity that would otherwise be purchased from the utility at the full retail rate) and energy exported to the grid (which is valued at a supply-only rate). Additional utilization of utility DG and energy storage rebates also further

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complicates the determination of estimated participant savings. Upcoming low-income discount rates through default service electric utilities may further increase the complexity of calculating savings from a significant reduction in the value of onsite consumption. Standardizing the Residential (Small) subprogram to no-cost offers is intended to simplify the value proposition to the customer. Through a no-cost offer, installing solar through ILSFA could create a reliable bill reduction that is easier for customers to understand, and the simplification could be harnessed with increased outreach by the Program Administrator and Grassroots Educators to explain and promote the benefits of the ILSFA offer presented by any Approved Vendor.

As such, the Agency is considering requiring offers in the Residential Solar (Small) sub-program be no-cost offers. For leased projects (including those leading to ownership) or PPA projects, this would mean a requirement for no ongoing payments. This requirement would replace the requirement that costs and fees are not more than 50% of the energy value received by the customer. Since a significant portion of the market participating in Residential Solar (Small) has already shown current incentives to be sufficient to provide no-cost offers, this proposed requirement intends to simplify the program for participant trust, to account for recent adjustments in the clean energy economy, and to better align with the subprogram's legislative intent.

Further, to provide a consistent Community Solar offer and alleviate challenges with utilization of new utility single-billing options, the Agency is also considering requiring no-cost offers for ILSFA Community Solar projects. Grassroots Educators and LIHEAP agencies participating in the Clean Energy Connector platform have explained that residents have mistrust of receiving separate bills for their community solar subscriptions, and Approved Vendors and participants have experienced challenges in utilizing single billing, seeing problems with confusing billing and delayed application of subscription credits.

The current Residential Solar (Small) REC model assumes no costs to the participants and the Community Solar model assumes a 50% savings level. If the Agency does move forward with proposing either of these proposals in the draft 2026 Long-Term Plan, further feedback will be requested at a later time on any refinements that would be needed for REC Price modeling.

### Questions

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.
5. In disallowing ongoing payments (i.e., monthly, quarterly, annual), what one-time fees, if any, should be allowed or prohibited?
6. Should no-cost offers be required for household subscribers in the Low-Income Community Solar sub-program?
  - a. Is a no cost ILSFA Community Solar offer an appropriate path to address concerns of participant trust and ease of participation, and negative experiences with current utility single billing?

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**ILLINOIS POWER AGENCY****TOPIC 3: Non-Profit and Public Facilities Sub-program Geographic Eligibility**Background

Section 1-56(b)(2)(C) of the IPA Act specifies that non-profits and public facilities are eligible to receive incentives for on-site photovoltaic generation. Furthermore, the Non-Profit and Public Facilities sub-program is designed to “support on-site photovoltaic distributed renewable energy generation devices to serve the load associated with not-for-profit customers and to support photovoltaic distributed renewable energy generation that uses photovoltaic technology to serve the load associated with public sector customers taking service at public buildings.”<sup>1</sup> Since the IPA Act does not specify which non-profit or public sector customers are eligible, Section 8.5.6.1 of the Long-Term Plan specifies eligibility to the sub-program. In particular, Section 8.5.6.1 explains that ILSFA Approved Vendors (AV) will have to demonstrate that the project:

- *Meets the standards described in Section 8.9 related to projects having sufficient connection to, and input from, income-eligible community members;*
- *Is sited within an environmental justice community or income-eligible community;*
- *Serves the electricity load of a building that is occupied by an organization that is a critical service provider for the community (e.g., youth centers, hospitals, homeless shelters, senior centers, community centers, places of worship); if a public facility, the building must host a department/agency that is a critical service provider meeting this standard; and ...*

As the current Long-Term Plan is written, Non-profit and Public Facility projects and the critical service providers they serve must be sited in either an environmental justice community or an income-eligible community. However, that is not the only possible interpretation of Section 1-56(b)(2)(C) of the IPA Act. It can also be reasonable to infer that projects that serve any non-profit or public facilities that in some manner serve income-eligible households should be eligible to participate in the Non-Profit and Public Facilities sub-program.

The current requirement excludes critical services providers doing vital work for income-eligible and environmental justice communities. The Agency is aware of several instances where a project was unable to be funded because the critical services provider was sited outside of an income-eligible or environmental justice community. However, the IPA has not struggled to allocate the funding for the Non-Profit and Public Facilities sub-program, allocating 99% in Program Year 5 and 95% in Program Year 6. However, if the geographic requirement were removed, the sub-program would likely become more competitive with more critical services providers able to participate. As such, the Agency is exploring options to serve non-profit and public facility critical service providers that are not located within an environmental justice community or income-eligible community,” but it wishes to maintain priority to serve providers sited in environmental justice or income-eligible communities.

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<sup>1</sup> 20 ILCS 3855/1-56(b)(2)(C).

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7. Given the current sub-program utilization, should the Non-Profit and Public Facilities sub-program be expanded to allow participation from critical service providers outside of income-eligible and environmental justice communities?
8. If the Program allows critical service providers outside of environmental justice and income-eligible communities to participate, should the Agency limit the projects sited outside of environmental justice and income-eligible communities? If so, on what criteria should this be limited? E.g., limiting by number of projects, portion of incentives (a carveout), not allowing submission until later in the program year, adjacency to an environmental justice community
9. How does the fact that the Non-Profit and Public Facilities sub-program budget is continually distributed close to or in its entirety impact this proposal?
10. Should the Critical Service Provider list be amended to include fewer categories?

**TOPIC 4: Collateral**Background

Illinois Solar for All currently follows the same collateral requirements and process as Illinois Shines. Section 8.2.1 of the Long-Term Plan highlights the relationship between Illinois Shines and ILSFA and specifically mentions that ILSFA will also require a collateral payment from Approved Vendors to ensure REC delivery requirements are met for the length of the REC Contract. The collateral requirements and process are explained in Section 7.12.2:

*An Approved Vendor is required to post collateral equivalent to 5% of the total contract value within 30 business days of when each batch's contract (or product order) is approved. As described in Section 7.10.5, if the collateral was provided in the form of a Letter of Credit, then the Approved Vendor may choose for the utility to withhold the collateral amount for each system from the last REC payment for the system (or only REC payment for small systems) in exchange for not needing to maintain the collateral in the form of the Letter of Credit.*

Section 1-56(b)(2) of the IPA Act states that ILSFA shall be implemented in a manner that seeks to maximize efficiency by coordinating with similar initiatives, like Illinois Shines. As such, ILSFA has been implemented in a manner that almost mirrors Illinois Shines. Section 1-75(c)(1)(L)(v) states:

*Each contract shall include provisions to ensure the delivery of the estimated quantity of renewable energy credits and ongoing collateral requirements and other provisions deemed appropriate by the Agency.*

Given the language above, ILSFA has required collateral within 30 business days of when the product order is approved. However, previous iterations of the Long-Term Plan have allowed for collateral to be withheld from REC payment when an energized system was applying to the Program. In 2024 Long-Term Plan, the Agency determined this had an unintended consequence of encouraging some AVs to submit projects after energization to avoid collateral.

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Section 1-56(b)(2) of the IPA Act also instructs that “The Agency shall make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program.”

The current collateral requirement has proven to be a challenge for some Approved Vendors to satisfy. In particular, Small and Emerging Approved Vendors have voiced concerns that deducting the collateral requirement from the REC payment may have a measurable impact on cashflow, thus leading to more program success. In an attempt to enable more Small and Emerging Approved Vendors to participate in ILSFA and to increase participation in the Residential Solar (Small) sub-program, the IPA is considering proposing to deduct the 5% collateral requirement from the REC payment for Small and Emerging Approved Vendors and for Approved Vendors submitting projects to the Residential Solar (Small) sub-program.

### Questions

11. Is there a concern that projects that are Part I approved without collateral will have less of an incentive to complete projects?
  - a. Could there be resulting risks to the participant or Program?
  - b. If there is a risk that there is less of an incentive to complete projects, are there alternative solutions that should be considered?
  - c. If there is a risk that there is less of an incentive to complete projects, are there additional requirements or conditions that could be coupled with the change to drive projects to completion?
12. Should the option for Small and Emerging Businesses to utilize a portion of their REC incentive payment as collateral for a project also be allowed in other sub-programs aside from Residential (Small), or capped at certain amounts per project or Approved Vendor? If so, please provide reasoned suggestions of a cap level.

## **TOPIC 5: Environmental Justice Communities**

### Background

Section 1-56(b)(2) of the IPA Act directs the IPA to define Environmental Justice Communities in the Initial Long-Term Plan and subsequent Long-Term Plan updates. Section 8.12.2 of the Long-Term Plan explains the current Environmental Justice Community (“EJC”) Methodology. The current EJC Methodology consists of analyzing data from Illinois census block groups for eleven environmental and six demographic indicators, then weighting each factor using an approach adapted from CalEnviroScreen. Communities with scores in the top 25% of all census block groups will be designated as EJCs for the purpose of ILSFA.

The Agency currently uses data from the US Environmental Protection Agency’s Environmental Justice Screening Tool (“EJScreen”) and committed to updating the Environmental Justice Communities Map on a five-year cadence to coincide with EJScreen and US Census data updates. The most recent update to the Environmental Justice Communities Map took place in 2023 and is due to be updated next in 2028. An updated version of EJScreen became available in 2024.

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In preparing for the development of the 2026 Long-Term Plan, the Agency launched an internal review to evaluate the effectiveness of the current method and data tools for defining Environmental Justice Communities. The review's purpose was to explore both improvements and alternatives to the current EJC methodology. Analysis of EJScreen data identified a number of variables which suggest missing or misreported data by virtue of significant increases in the number of zero values compared to 2018 and 2022 versions of the dataset. This potentially missing or misreported data was not found to significantly correlate with specific geographical locations but has historically been used directly from EJScreen and is weighted as such in the Agency's designation of block groups.

The Agency also explored downstate representation in Environmental Justice Communities from previous stakeholder feedback inquiring on the extent to which the current EJScreen dataset accurately represents conditions experienced in rural areas of Illinois. Of the Regional Transmission Organizations which operate in Illinois (PJM and MISO), land area for larger-scale solar development is predominantly available in MISO-Zone 4, and a majority of the state's electricity load and 70% of Illinois block groups reside in PJM-ComEd. This division of northern and downstate regions further correlates with variance in socioeconomic, exposure, and environmental conditions between metropolitan and rural areas, and the Agency looks to ensure that allocation of financial incentives takes a representative approach. The Agency therefore investigated a calculation change to designate the top 25% of block groups in MISO-Zone 4 and the top 25% of block groups in PJM-ComEd as EJCs. With this approach, the same number of block groups are designated as EJCs throughout the state, but there is a 6.5% net gain in MISO-Zone 4, generally around downstate urban areas, and a 6.4% net loss in PJM-ComEd, generally around the suburban Chicago metropolitan area.

In early 2025, EJScreen was discontinued and removed from the US EPA's official website with no indication if or when it would be reinstated or updated.

Following the discontinuation of the US EPA's EJScreen, the Agency seeks feedback on the following potential updates: (1) use data from the most recent version of EJScreen and modify the four data variables within EJScreen which the analysis found to be misreported, and (2) designate the top 25% of block groups as EJCs in both MISO-Zone 4 and in PJM-ComEd. These potential updates could provide data reliability and flexibility in timing as options for successive updates are explored, as well as encourage downstate representation of environmental justice which stakeholder feedback has indicated the current data and/or methodology does not yet accurately reflect. This update would result in an 8.3% loss/gain rate of total designations; 83.4% of block groups do not experience any change.

### Questions

13. Do stakeholders agree that updating the Environmental Justice Communities Map in 2026 with modified 2024 EJScreen data and proportioning EJC designations by RTO territory strikes an appropriate balance between achieving data integrity and extending the Agency's timeline to make a methodology change in response to the uncertainty of federal data?

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- a. If so, does changing the EJ designation methodology to organizing EJC designations by RTO territory represent the spirit of environmental justice?
  - b. If not, should the Agency consider updating the EJC Map with only the first proposal to modify misrepresented variables in the recent 2024 dataset? This would result in a 4.7% loss/gain rate of total designations.
14. The update schedule established in the 2024 Long-Term Plan was based on the cadence of EJScreen and US Census data. Do stakeholders recommend maintaining this 5-year cycle even though updates following this proposal cannot anticipate the continuation of EJScreen?
15. What disruptions might an update to the Environmental Justice Communities Map in 2026 that proportions EJC designations by RTO territory create, assuming a year of overlap in which both Map versions will be accepted?
16. What are alternative recommendations for updates to the EJC data or methodology following discontinuation of the US EPA's EJScreen?

**TOPIC 6: Home Repairs and Upgrades Pilot**Background

Section 1-56(b)(4) of the IPA Act grants the Agency the authority to propose additional programs in the Long-Term Plan which enhance the benefits experienced by low-income customers and participation levels in ILSFA subprograms. As such, Section 8.5.3.3 of the Long-Term Plan states:

*The Agency has concluded that a pilot program to provide additional incentives for the home repairs and upgrades necessary to install solar on homes would 'more effectively maximize[...] the benefits to low-income customers' provided by the Illinois Solar for All program.*

The Home Repairs and Upgrades Pilot was proposed in the 2022 Long-Term Plan and launched in July 2023. The Pilot Design program materials explain that the Pilot was initially intended to be active for two years to inform improvements to the Residential Solar (Small) sub-program, dedicating up to a quarter of the Residential (Small) budget annually for projects requiring electric or roof repairs, and has since been extended for a third year of operation through the 2025-2026 Program Year.

The number of project applications requesting Home Repairs and Upgrades incentives has seen a significant increase between the first and second year. The Pilot was implemented beginning in the ILSFA 2023-2024 Program Year, and as of the beginning of May 2025, produced the following results:

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<b>Program Year</b>	<b>Projects Submitted</b>	<b>Projects Awarded Contracts</b>	<b>Contracted Capacity (kW/AC)</b>	<b>Contracted Value of Home Repairs</b>	<b>Contracted Total REC Incentives</b>
2023-2024	10	10	73	\$14,450	\$311,178
2024-2025*	145	65	683	\$774,780	\$3,481,097

*\*Partial data is currently provided for the 2024-2025 Program Year, being reported as of the beginning of May 2025. Results are projected to increase further between May 2025 and June 2025 as submitted projects continue through the program pipeline.*

The Illinois Climate Bank was awarded \$156,000,000 through the US EPA Greenhouse Gas Reduction Fund for Solar for All Expansion Programs. One of the Illinois Solar for All Expansion Programs is the Enabling Upgrades grant, which will provide upfront financing to address the same barriers to solar accessibility as the Home Repairs and Upgrades Pilot, in the form of grants for deferred maintenance, health and safety repairs, or electrical panel upgrades necessary to install a solar photovoltaic system. The Illinois Climate Bank intends to rollout Illinois Solar for All Expansion Programs later in 2025, including the Enabling Upgrades grants. Additional questions or feedback on the Enabling Upgrades grants may be directed to the Illinois Climate Bank.<sup>2</sup>

The Agency will be extending the Home Repairs and Upgrades Pilot through the 2025-2026 Program Year due to the success in increasing project applications and is considering its ongoing place in ILSFA. While the Illinois Climate Bank intends to roll out the Enabling Upgrades grant in 2025, ongoing changes at the federal level may lead to delays and the Agency believes the Home Repairs and Upgrades Pilot is showing value in addressing a barrier to Residential (Small) participation. The Illinois Climate Bank’s Enabling Upgrades grants intend to address the same barrier to solar as the Home Repairs and Upgrades Pilot and will offer necessary grants upfront, but the Agency also sees value in continuing the Home Repairs and Upgrades Pilot until the Illinois Climate Bank award funding begins operation.

Questions

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?
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?
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?

<sup>2</sup> For more information about the Illinois Climate Bank’s Solar for All Expansion Programs see <https://www.il-fa.com/programs/sfa>. Questions may be directed to [SFA@il-fa.com](mailto:SFA@il-fa.com).

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**ILLINOIS POWER AGENCY****TOPIC 7: Multifamily Buildings**Background

Currently, the 2024 Long-Term Plan does not define nor provide guidance on how vacant units should be treated for income verification purposes in multi-family buildings. For two-to-four unit buildings, at least two of the households must be income-eligible. For a multi-family building with five or more units, at least 50% of the households must be income-eligible, or the building owner may demonstrate that the building meets the definition of “affordable housing” under the Illinois Affordable Housing Act.

The IPA has received inquiries regarding projects in multi-family buildings with vacant units. In particular, Approved Vendors are uncertain whether “households” includes vacant units. To provide clarity, the IPA is considering changing the word “households” to “units” when discussing income verification for multi-unit buildings.

Questions

20. How often have Approved Vendors encountered vacant units in multi-unit buildings being considered for ILSFA? What portion of vacancy is common in buildings of various sizes?
21. How should the Program distinguish between “household” or “tenant” and “unit” for the purposes of building eligibility verification?
22. Have other relevant programs addressed the issue of vacant units? If so, what approach is used in the context of determining building eligibility for services?
23. Would making the change from “households” to “units” lead to potential gaming situations, in which otherwise ineligible buildings would participate in ILSFA? If so, how what process can the IPA adopt to prevent this?

**TOPIC 8: Master-Metered Multifamily Buildings in the Community Solar Sub-program**Background

In the 2024 Long-Term Plan, the IPA determined that master-metered buildings should not be allowed to subscribe as an income-eligible household at any building or subscription size. Section 8.5.5 of the 2024 Long-Term Plan states:

*There are over 341,000 households that received LIHEAP in the 2022-23 Program Year who must manage their own energy burdens, and the current pipeline of available ILSFA Community Solar subscriptions that can be created annually is only in the thousands, several orders of magnitude smaller. The Agency believes that allowing master-metered accounts to subscribe in place of individual income-eligible households is contrary to the goals of the program and therefore master-metered buildings should not be allowed to subscribe as an income-eligible household at any building or subscription size beginning in the 2024-2025 Program Year.*

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Currently, the Agency allows master-metered buildings to subscribe as an anchor tenant, with that portion of RECs valued at the Illinois Shines Community Driven Community Solar REC price, the same as any other anchor tenant, and as such, savings are not required to be passed on to residents. However, the Agency is aware that there is still a desire to allow master-metered buildings to participate in the Community Solar sub-program and for residents to see benefits through ILSFA. Distributed Generation is not realistic for all such buildings, and community solar subscriptions can provide an avenue for residents in those buildings to benefit indirectly. The Agency maintains its stance that prioritizing individual household energy burdens is the primary goal of the ILSFA savings benefits, but it also seeks a path for participation of master-metered buildings. As a way of balancing the two objectives, the Agency is seeking stakeholder feedback on alternative ways master-metered buildings might be able to participate in the Community Solar sub-program.

The Agency is considering proposing to allow eligible master-metered multi-unit residences to participate as an anchor subscriber, but with an alternative anchor price based on the ILSFA Community Solar REC model, but adjusting the pricing to remove incentives covering customer acquisition. Anchor subscribers cannot comprise more than 40% of a project's capacity. The host building would need to pass along 50% of savings to residents under the Program's existing Tangible Economic Benefits requirements, as described in Section 8.5.4.3 of the Long-Term Plan.

**Questions**

24. What are the benefits and challenges of allowing master-metered buildings to subscribe to a community solar project as anything other than an anchor tenant with the current anchor tenant REC price?
  - a. Is there an alternative way that master-metered residential buildings and their residents could access benefits through ILSFA Community Solar?
  - b. Should the Agency adopt an adjusted REC price for an eligible master-metered anchor tenant portion based on the ILSFA Community Solar REC price that takes into account the simplified acquisition costs?
25. How would a carveout within the Community Solar sub-program that is solely dedicated to community solar projects that serve master-metered buildings compare to the above option?
  - a. Are there advantages, or disadvantages, to pursuing a carveout within the Community Solar sub-program? Please explain.
  - b. What would be a reasonable carveout be to ensure the community solar project is primarily benefitting individual households?

**TOPIC 9: Job Training Requirements****Background**

Section 1-56(b)(2) contains two provisions designed to ensure that job trainees participate in the installation of photovoltaic projects supported by ILSFA. The first provision states:

*Projects must include job training opportunities if available, with the specific level of trainees usage to be determined through the Agency's long-term renewable resources procurement*

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*plan, and the Illinois Solar for All Program Administrator shall coordinate with the job training programs described in paragraph (1) of subsection (a) of Section 16-108.12 of the Public Utilities Act and in the Energy Transition Act.*

The second provision then states:

*Companies participating in this program that install solar panels shall commit to hiring job trainees for a portion of their low-income installation, and an administrator shall facilitate partnering the companies that install solar panels with entities that provide solar panel installation job training.*

The IPA Act does not define who would qualify as a job trainee nor what is meant by “a portion” of job trainees. Section 8.9.1 of the 2024 Long-Term Plan defines Eligible Job Trainees as those who complete a training program created by Section 16-108.12 of the Public Utilities (“PUA”) Act within 36 months or those who complete 50% of classroom requirements of an Other Qualifying Program in the past 24 months. Additionally, it interprets a “portion” of solar installations to mean that ILSFA Approved Vendors must employ one or more job trainees from the job training programs created by Section 16-108.12 of the Public Utilities Act or from a designated Other Qualifying Program at least 33% of projects (on a rolling average basis). Furthermore, ILSFA Approved Vendors must demonstrate that in the first year of program participation, 10% of the hours worked on all projects will be by job trainees, then the percentage would increase to 20% for the second year, and 33% for the third year.

The IPA’s goal is to promote the hiring of Eligible Job Trainees in ILSFA, not to create conditions where Approved Vendors discharge job trainees after the 36- or 24-months. The Agency is aware that some job training programs under Section 16-108.12 of the PUA are still rolling out and the uncertain timeline has proven to be a burden to some AVs. In addition, AVs have expressed that the 36- and 24-month requirement does not necessarily equate to having a mastery of the skills necessary to install solar panels. Instead, AVs have expressed seeing a range of skill mastery among job trainees.

In addition to the challenges of cycling job trainees every 36 or 24 months, AVs have also reported that they often face challenges with adequately staffing projects with Eligible Job Trainees. This challenge is more acute for new AVs and AVs designated as Small and Emerging Businesses, who struggle to satisfy the annual job trainee percentage requirements.

To alleviate these challenges, the Agency is considering proposing to either (1) update the definition of Eligible Job Trainee by increasing the length of time a “trainee” would be considered a “trainee” or (2) adjust the increasing annual job trainee percentage requirements for AVs.

### Questions

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?
27. Are there any recommendations for how the definition of “trainee” could be further improved?
28. How have Approved Vendors handled the aging out of trainees to date?

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29. How could the job training portfolio requirements be improved to both maximize the use of trainees and support long-term employment of trainees?
30. What levels of trainee utilization across the ILSFA portfolio seems realistic and maintainable while simultaneously supporting job trainees in a significant portion of portfolios?
31. Are there currently challenges with elements of the job training programs and their ability to properly prepare trainees for work that requires reconsideration or enhancement for qualifying trainees? If yes, please explain.

**TOPIC 10: Residential (Small) Participant Referral Pilot**Background

The IPA Act allows the Agency to propose alternative programs to improve ILSFA. Section 1-56(b)(2) states:

*Additional programs may target market segments not specified above and may also include incentives targeted to increase the uptake of photovoltaic technologies by low-income customers, including energy storage paired with photovoltaics, if the Commission determines that the Illinois Solar for All Program would provide greater benefits to the public health and well-being of low-income residents through also supporting that additional program versus supporting programs already authorized.*

In the 2022 Long-Term Plan, the Agency proposed two pilot programs to address barriers to success in the Residential (Small) sub-program, the Bright Neighborhoods and the Home Repairs Pilots.

The Agency is considering another Pilot to address ongoing undersubscription of the Residential (Small) sub-program that would provide a referral stipend to income-eligible Residential (Small) participants who connect the Program to eligible households that then successfully participate in the Residential (Small) sub-program as well, achieving an energized photovoltaic system through ILSFA.

Stipends would be processed and disbursed by the Program Administrator. The stipends for this Pilot would be funded through the Program Administrator budget.

Questions

32. How effective might a Pilot initiative offering stipends for successful referrals of households to the Residential (Small) be in improving the sub-program participation?
33. Is energization of a referred participant's Residential (Small) project the appropriate milestone to prompt the referral stipend to the referring participant?
  - a. Would a multi-level stipend for the referred participant meeting certain milestones be more effective? What other milestone(s) should be considered?
34. What additional Pilots could be explored by the Agency to enhance participation in the Residential (Small) sub-program?