

ELEVATE
Equity through climate action

Request for Information #1 on Development of the Storage for All Program

November 6, 2026

Program Funding

1. CRGA provides that the Agency may utilize up to 25% of the funds currently allocated to the low-income single-family and multifamily subprograms, and the subprogram for nonprofit and public facilities of the ILSFA program for the Storage for All program. As a frame of reference, in Program Year 27, the ILSFA program budget is approximately $50 million meaning a 25% utilization would result in not more than about $7.6 million being pulled from the ILSFA program to support the Storage for All program. Please provide feedback on what percentage of funding would be most appropriate to start with for the Storage for All program. Include supporting insights, data or other information supporting your recommendation into how this initial funding sum may affect program outcomes in the near and long-term.

> 1.1. Please find data and assumptions to support your response to Question 1 above in Appendix A to this document.
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> 1.2. Additionally, if you find the assumptions the IPA made in Appendix A to be inconsistent with current market conditions, please provide feedback as to the correct assumptions the Agency can review and the sources for those assumptions.

Response: Budgets for Residential Solar (Small) have been exhausted in recent program years and has decreased due to the depletion of RERF as a funding source. Pulling budget from Residential Solar (Small) will result in less solar being installed. Some questions need to be addressed before we are able to determine the amount of budget that should be utilized for storage. What percentage of AVs are seeing requests from their customers about battery attachment? How much is a storage component on average, and does the cost increase when storage is added to an existing project? What amount of the budget is being considered for a storage project?

The simplest implementation of this is to create a flat rate rebate amount per kWh for storage components similar to the utility programs. This will mean that only the storage component is being taken from the budget rather than project + storage and will eliminate establishing vastly different processes for new vs existing installations. If a storage only rebate is established, the budget for this program should be more restrictive because the full cost of the project isn't being taken into consideration. For example, if the program deems $45,000 for a project + storage but the storage component is only $3,000 of that, only $3,000 should be taken from the storage carveout of the budget. Therefore, less than 25% should be utilized for storage. Starting with closer to 10% will allow the program to run this storage incentive as a pilot and an adjustment to the storage budget can be made in future program years.

2. If applicable, please expand on any answer provided to Question 1 above. For example, should the IPA start by utilizing a smaller amount of the permissible budget in the first iteration of this program (<25%)? Alternatively, should the Agency utilize the full budget allowance under the law (25%), or somewhere in between? Please provide any supporting reasoning for the specified preferred budget percentage in your response.

Integration with the Illinois Solar for All Program

3. When in the application process should the storage portion of a solar + storage project be selected for incentivization? Said another way, how should the Storage for All program best intertwine itself with the already established processes of the ILSFA program?

> 3.1. Should the Agency consider different approaches, depending on whether it is a current or future ILSFA participant? Meaning, should there be an application process for already approved ILSFA solar projects to add a storage component to the system through the Storage for All program and then a separate, distinct application process for projects that are wanting to install solar and storage together at once and looking to apply to both the ILSFA and Storage for All programs?
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> 3.2. Please consider any existing processes, such as the ILSFA application submission process, project selection process, as well as contracting processes that are inflexible, such as REC payment timing, etc.

Response: tying battery incentives to REC payments will be problematic and storage should not be contracted in the same way as PV installations. But having a totally separate application process for AVs will be challenging as well. It seems likely that many AVs will install batteries at the same time as solar, but limiting it in this way feels unfair to prior ILSFA participants. The application windows should follow the same schedule/timeline to their sub-program counterpart. Applications can be selected for “Battery only” or “Solar with Battery” to ensure that the submission information and review is clear.

Project Selection would need to be implemented for “Battery Only” projects to ensure fairness for projects that were already selected once for ILSFA. Otherwise, “Solar with Battery” will be treated like a normal Project Selection, like the Home Repair Pilot. This will allow prior projects to add storage without being unfair to new participants. While the schedule for this process will be in line with the PV applications, the payment process will need to be different because batteries will not produce RECs. Therefore, a simple rebate for storage components only will be the simplest to implement.

Program Focus

4. Should the Storage for All program be developed in such a way as to specifically focus on one or more "focus" areas, or alternatively, should the Agency seek to incentivize as many storage projects as possible? Potential areas of program focus could be supporting community energy resilience, disaster preparedness, or energy bill reductions (particularly for residents of low-income and environmental justice communities).

Response: if projects are already co-located with ILSFA solar projects, then whatever benefits the batteries provide will be benefitting LMI communities. Batteries can provide many benefits. The Storage for All program should not be telling folks how to use their batteries – if customers want to use it purely for resiliency/backup power, cost savings, or both, that should be up to them. Additionally, since customers or AVs taking the existing storage rebate from ComEd and Ameren will be forced onto the SDVPP, and it seems likely most customers will take this rebate, customers will already be positioned for cost savings from the battery. The program should be developed to incentivize as many storage projects as possible, which points to a $/kWh rebate type structure.

5. Should the program focus - if one is selected - be a criterion that is evaluated during project review and selection? If yes, please provide details on how focus areas can be translated to evaluation criteria and applied in a fair and equitable manner necessary for project selection.

Response: We do not recommend a program focus for batteries.

Rebate, Grant, or Other Incentive Mechanism

6. CRGA allows for flexibility in the way the incentive for this program is paid out to participants, noting that the Agency can utilize grants, rebates, or other incentives to encourage storage development. With this in mind, what incentive approach works best for this program – an ongoing REC adder to the already established ILSFA REC price for a project or is a one-time payment such as a rebate or a grant a better option?

Response: since batteries do not generate energy, tying them to RECs would not be our preferred approach. Additionally, tying battery incentives to REC amounts benefits folks who can fit more solar on their properties. Batteries can provide resiliency, cost savings, and grid benefits irrespective of solar production. Therefore, grants or rebates in a form such as $/kWh would be most effective and simplistic.

7. Is there a situation where a solar + storage project in development would be reduced to just the solar installation? For example, if a customer originally intends to have a solar +

storage project installed, then after application to ILSFA and Storage for All determine that they no longer want to install the storage portion of the project.

> 7.1. Considering situations like this are likely to arise - how linked should the storage and solar incentives be? If the storage portion of a project is not completed, should the solar incentive also be considered at risk? If a project approved for solar + storage incentives is built with just a solar installation, what consequences are appropriate at the contract and program levels?

Response: if a customer decides not to move forward with a battery, but is still interested in solar, they should not be penalized. We propose that the storage rebate is held separately from the solar REC incentive which will allow for participants to change their minds if needed. This will also allow for clearer instruction if the storage budget is exceeded when projects + storage are submitted. If that budget is exceeded, the Approved Vendor will have the option to cover the cost of the storage or remove the storage, similar to the Home Repair Pilot.

8. What opportunities or challenges should the Agency consider with one approach or another? Please explain in detail the impacts of the preferred approach.

Response: RECs are not produced by storage and calculating benefits to participants will be next to impossible to do accurately. A rebate for the Approved Vendor in $/kWh will be the most simplistic approach and will allow a smaller portion of the budget used while ensuring maximum number of storage projects with that limited budget.

Ensuring No Upfront Costs and Understanding Customer Benefits

9. Is there anything specific the Agency should keep in mind while working to ensure that no upfront costs are paid by participants in the Storage for All program?

Response: the financial benefits of batteries are not as clear cut as solar. Financial performance depends on rate structures, battery dispatch strategies, upfront costs, etc. Therefore, ensuring pricing is appropriate to cover full cost and ensuring storage is no cost to participants is the most effective way to prevent upfront costs to participants.

10. How should Storage for All identify, quantify, and prioritize the various benefits of storage to the customer, including household energy burden reduction, household and local reliability improvements, and disaster preparedness?

Response: We feel that this program should not focus on quantifying benefits. Folks that participate will have already gone through ILSFA, ensuring benefits are reaching

underserved communities, and customers should be free to choose how to deploy their batteries, whether for resiliency, cost savings, or some combination of the two.

11. How can the Agency ensure that the ILSFA program's 50% savings requirement remains unimpacted or is augmented by the addition of an energy storage component to a solar project participating in the ILSFA program?

> 11.1. Please consider that the ILSFA program prioritizes no-cost offers for Residential Solar (Small) customers and the vast majority of existing ILSFA Residential Solar (Small) projects utilize no-cost leases.

Response: Some AVs are already offering storage as an add on under a no-cost lease/PPA. There are very few scenarios in which a battery will negatively impact customer savings. It can be used to prevent grid export of solar at lower supply costs, arbitrage TOU/hourly pricing rates, reduce demand charges (where applicable), and will likely participate in the SDVPP. Enforcing a no cost storage option and ensuring that incentives are sufficient to support storage costs for Approved Vendors will help the program maintain its savings requirement.

12. The Agency is requesting that project developers provide data related to costs for developing and installing solar + storage projects in Illinois, especially as it relates to the storage portion of the project. Please mark any cost data shared with the Agency as confidential per the Feedback Submission Process outlined above.

13. The Agency is also requesting that project developers provide data related to the ongoing benefits seen by customers with storage as a part of their solar installation. The Agency anticipates that in addition to quantifiable bill analysis, other benefits may be quantifiable as avoided outages in minutes or hours, and community benefit of reduced local grid burden associated with service disruptions.

> 13.1. Does the reduction of energy burden by a customer's LIDR impact the benefits seen from the addition of storage to a customer's solar installation?

Avoiding Double Counting of Incentives

14. What should the Agency consider to ensure incentives aren't double counted, especially keeping in mind that Storage for All projects are required to be colocated with Illinois Solar for All projects?

Response: If the incentives for storage are separate from the RECs for ILSFA this should not be an issue.

15. What assumptions should be made about other sources of funding for solar + storage projects that would participate in this program? (CRGA's VPP program, existing solar + storage rebate, etc.

Response: If the predominant model continues to be a no-cost PPA or lease, it should be assumed that AVs are taking the ITC for storage projects. For DC-coupled systems, this could be a significant benefit for solar+storage projects where the bulk of the system costs are allocated to the ITC basis. It should be assumed that most customers will take the existing solar and storage rebates from the utilities and as such will be participating in the SDVPP and the eventual full scale VPP.