

From: [Sameer Doshi](#)
To: [Illinois Shines Program Administrator](#); [IPA.Solar](#)
Subject: [External] Re: Draft Program Guidebook Released for Feedback – Comments Due March 27, 2024
Date: Thursday, March 28, 2024 8:09:20 AM

Hello,

Here are some comments on the draft Program Year 2024-2025 Illinois Shines Program Guidebook published on March 13, 2024. I am speaking only for myself (on behalf of no entity) and haven't discussed or shared this with anyone else. And as usual, I'm trying to focus just on technical accuracy and coherence.

Throughout the Guidebook, there are many references to "Section 16-108.21 of the Public Utilities Act." Presumably this arises from the definition of "equity eligible persons" in IPA Act § 1–10 as modified by Public Act 102-0662. However, I believe that reference in the statute was a scrivener's error by the General Assembly— as Section 16-108.12 is about solar job training and Section 16–108.21 is about a wholly unrelated topic. So I respectfully suggest editing those references in the Guidebook to say 16-108.12.

Throughout the Guidebook there are many references to the "2022 REC Contract" or "2022 REC Delivery Contract" with no additional reference in the same sentence to the 2024 REC contract. Some of these instances might merit updating.

Page 16: in the chart at the top, in the second row of headings, the widths of cells seem to be off kilter.

Page 18: the word "nine" in "nine months" should be edited to "eleven," similar to the edit in the final line on the page (if eleven months is intended).

Page 22: The "General Waitlist Procedures Across All Program Categories" discussion here implies that the Small DG and Large DG project categories will have separate waitlists for Group A and Group B. If that's the intent, the Guidebook should explain how that will work when there's now no distinction between the "Group"-based locations for capacity allocation in the category (Section 1.D). If that's not the intent, then page 22 should not give this implication.

Page 22: "Section G" should say "Section H"

Page 24, "Public Schools Waitlist Specifics" discussion: Because Group A and Group B will now be merged for purposes of capacity allocation in the PY 2024-2025 Public Schools project category per § 1.F and 2024 LTRRPP § 7.4.4, the express mentions of "Groups" perhaps should be removed from this waitlist discussion.

"Section 1.H" on pages 11, 19, & 21 should be changed to "Section 1.I"

"Section 1.D" on pages 13, 24, & 108 should be changed to "Section 1.E"

"Section 1.D" on page 96 should maybe be changed to "Section 1.E" — although come to think of it, I can't find the specific point in new § 1.E / old § 1.D (*e.g.* on page 18) about maintaining a spot on an EEC waitlist.

“Section 1.I” on pages 48 & 97 should be changed to “Section 1.J”

Page 113: the August 2020, April 2023, & May 2023 versions of the Program Guidebook are not listed.

Page 143 (part of Appendix F): there is a reference to the “waitlist for the 2023-2024 Program year.” Based on the context of the sentence, I think maybe that reference should be updated to 2024-2025.

Page 188: Footnote 92 (part of Appendix M): this refers to House Bill 3445 (presumably of the 103rd IL General Assembly), but that bill was amendatorily vetoed by the Governor in August 2023 and not enacted. The intended reference here was probably the similar Senate Bill 1699, which was enacted as Public Act 103-0580 in December 2023.

Thank you for your consideration,
Sameer

On Mar 13, 2024, at 6:56 PM, Illinois Shines Program Administrator
<admin@illinoisshines.com> wrote:

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Draft Program Guidebook Released for Feedback – Comments Due March 27, 2024

March 13, 2024

The Agency has released a draft of the 2024-25 Program Year Illinois Shines Program Guidebook for stakeholder feedback.

This draft Guidebook will undergo stakeholder feedback, the Agency will review comments submitted and then release a final version of the Guidebook for the 2024-25 Program Year, which commences on June 3, 2024. Changes in this draft version of the Program Guidebook include updates to conform with the ICC’s Final Order on the IPA’s 2024 Long-Term Renewable Resources Plan dated February 20, 2024 , and changes derived from stand-alone feedback process that have already occurred, such as [Advance of Capital Evaluation Criteria](#) and [2024 AV Application](#) update, as well as [changes to the Public School category derived from the passing of Public Act 103-0580](#).

The Agency will release the final Program Guidebook for the 2024-25 Program Year on April 19, 2024, 45 days in advance of the start of the Program Year, to allow Program participants time to review, understand, and prepare to be in compliance with all changes in the Program Guidebook when the 2024-25 Program Year commences on June 3, 2024.

PLEASE NOTE – Changes to the Program requirements via edits to the Program Guidebook as published on April 19, 2024 will not take effect until June 3, 2024. Beginning June 3, 2024, all Program participants are expected to be in compliance with new Program requirements in the finalized 2024 Long-Term Plan and the updated Program Guidebook or may face disciplinary action.

Next Steps in Program Guidebook Comment & Update Process

- Comments on draft Program Guidebook due March 27, 2024
 - [Draft Program Guidebook](#)
 - [Redline comparison between current 2023-24 Program Guidebook and draft 2024-25 Program Guidebook](#)
 - Comments should be emailed to IPA.Solar@Illinois.gov with subject line “2024-25 Program Guidebook Feedback”
- Agency to review comments and make final edits
- Agency to release final Program Guidebook for the 2024-25 Program Year on April 19, 2024
- Updated Program Guidebook takes effect June 3, 2024

High Level Changes to Draft Guidebook

- Program Capacity Increase – from 666 MW to 800 MW starting June 3, 2024
- Removed the capacity delineations of Group A and Group B for Distributed Generation categories
- Approved increase in application fees to \$20/kW, not to exceed \$15,000/project (increase from \$10/kW; \$5,000/project)
- Program will close and not accept new Part I applications from May 27, 2024 to June 2, 2024, in order to prepare for next Program Year
- Updated prioritization approach for redistributing uncontracted capacity
- Created Distributed Generation and Community Solar sub-categories for the Public Schools category
- New information regarding the Equity Eligible Contractor (EEC) requirements
- 200% DC/AC ratio limit for systems that include a battery/storage component
- Clarification on Community Solar residential and small commercial customers with multiple subscriptions requirement
- Removal of the 5% of REC contract value collateral requirement for Public Schools in the Tier 1 and 2 categories, or located in environmental justice communities
- Creation of new EEC Subcontractor category
- New information on the advance of capital process
- Development of an Escrow process and Solar Restitution program to provide economic assistance to harmed customers

Stakeholders can find the draft Program Guidebook at the [Program Documents](#) page of the website. Responses will be made public and published on the Program's website <https://illinoisshines.com/>. However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions of their comments. Stakeholders should email comments to IPA.Solar@illinois.gov by March 27, 2024.

Thank you!

Illinois Shines Program

admin@IllinoisShines.com