



ILLINOIS POWER AGENCY

**Illinois Shines Program and Illinois Solar for All Program
REC Contract Modifications**

Request for Stakeholder Feedback

December 6, 2024

This request for stakeholder feedback seeks input on the modifications proposed to be made to the REC Contracts used for the Illinois Shines program (also known as the “Adjustable Block Program” or “ABP”) and Illinois Solar for All (“ILSFA”) program (collectively “the programs”).

Background

In accordance with Section 16-111.5(b)(5)(ii)(B) of the Public Utilities Act, on October 20, 2023, the Illinois Power Agency (“Agency” or “IPA”) filed the 2024 Long-Term Renewable Resources Procurement Plan (“2024 Long-Term Plan”) for approval by the Illinois Commerce Commission (“ICC”). The ICC approved the 2024 Long-Term Plan with modifications in Docket No. 23-0714 on February 20, 2024. The IPA issued a final 2024 Long-Term Plan in accordance with this Commission Order on April 19, 2024.

Implementation of the 2024 Long-Term Plan¹ requires modifications to the existing REC Contracts for the Illinois Shines and ILSFA Programs. These contract modifications include: 1) an updated deadline for the submission of annual reports under the applicable Program,² 2) unbatching and rebatching process to facilitate assignment of projects,³ 3) implementation of an escrow process⁴ and 4) provision of economic incentives for stranded customer projects.⁵

Invitation to comment on Proposed Edits to REC Contract

On December 6, 2024, the Agency posted draft contract redlines for all REC Contracts used under the Illinois Shines and ILSFA Programs. The redlines introduce proposed edits to the REC Contracts to implement the aforementioned modifications required by the 2024 Long-Term Plan. These redlines are provided for the convenience of parties so that the edits can be reviewed in the context of the applicable agreement in its entirety. The IPA is seeking feedback on the proposed edits.

Once the edits are finalized, incorporating stakeholder input as appropriate, the edits will be provided in the form of a Contract Addendum. Each Approved Vendor with an existing REC Contract(s) is expected to execute the Contract Addendum associated with the applicable REC Contract(s) to which that Approved Vendor is a counterparty.

¹ <https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/final-2024-long-term-renewable-resources-procurement-plan-19-apr-2024.pdf>

² See Section 7.15 of the 2024 Long-Term Plan.

³ See Section 9.4.2.1.3 of the 2024 Long-Term Plan.

⁴ See Section 9.4.2.1.2 of the 2024 Long-Term Plan; the escrow process is not applicable to ILSFA program.

⁵ See Section 9.4.2.1.1 of the 2024 Long-Term Plan.

Modifications to REC Contract Request for Feedback
December 6, 2024

This Request for Stakeholder Feedback is to seek feedback on the modifications proposed to the REC Contracts posted on December 6, 2024.

Specifically, for the Illinois Shines Program: [\[click here\]](#)

- [Draft Modifications to 2019 ABP REC Contract;](#)
- [Draft Modifications to 2021 ABP 15-year REC Contract;](#)
- [Draft Modifications to 2021 ABP 20-year REC Contract;](#)
- [Draft Modifications to 2022 ABP 15-year REC Contract;](#)
- [Draft Modifications to 2022 ABP 20-year REC Contract;](#)
- [Draft Modifications to 2024 ABP 15-year REC Contract;](#) and
- [Draft Modifications to 2024 ABP 20-year REC Contract.](#)
- [Sample “ABP Contract Addendum” template](#) (provided for convenience).

Specifically, for the ILSFA Program:⁶

- [Draft Modifications to 2019 ILSFA \(Utility-counterparty\) REC Contract;](#)
- [Draft Modifications to 2021 ILSFA \(Utility-counterparty\) REC Contract;](#)
- [Draft Modifications to 2022 ILSFA \(Utility-counterparty\) REC Contract;](#) and
- [Draft Modifications to 2024 ILSFA \(Utility-counterparty\) REC Contract.](#)
- [Sample “ILSFA Contract Addendum” template](#) (provided for convenience).

Responses are due by January 10, 2025 and should be sent to: IPA.Solar@illinois.gov

- Please include in the subject “[Responder’s Name] – Feedback on REC Contract Amendment”
- Please provide telephone and email contact information in the event that the Agency seeks clarification regarding your comments.
- Any proposed edits to the contract language must be clearly indicated by tracked changes to the Microsoft Word version of the draft redline document. We strongly encourage you to provide explanatory notes either in a separate document or through the use of “Comments” in Microsoft Word.
- Please limit feedback and comments to the proposed modifications only; comments received that are unrelated to the proposed modifications will not be considered.

Comments received in accordance with the process outlined above will be reviewed by representatives from the IPA, the Illinois Shines Program Administrator (Energy Solutions), the ILSFA Program

⁶ To facilitate the review of proposed edits to the ILSFA REC Contracts, only the “utility-counterparty” version of the ILSFA REC Contracts are provided for review. All modifications accepted for the “utility-counterparty” version will be adopted as appropriate for the “IPA-counterparty” versions upon finalization of the contract modifications.

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Administrator (Elevate Energy), Ameren Illinois Company, Commonwealth Edison Company, MidAmerican Energy Company, Staff of the ICC, and the IPA's Procurement Administrator (NERA Economic Consulting).

In general, responses will be made public and published on the Illinois Shines website (<https://illinoisshines.com/>), the ILSFA website (<https://www.illinoissfa.com/>), or the Agency's website (<https://ipa.illinois.gov/>). 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 Procurement Administrator or the Program Administrators determine that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions.

Should you have any questions or need additional information, please contact the IPA at IPA.Solar@illinois.gov.