



March 26, 2025

Dear Illinois Power Agency,

The Joint Solar Parties (JSP), comprised of the Solar Energy Industries Association (SEIA), the Coalition for Community Solar Access (CCSA) and the Illinois Solar Energy Association (ISEA), appreciate the Illinois Power Agency's (IPA) continued commitment to refining and improving the Illinois Shines program. The updates and clarifications in the draft guidebook reflect a strong dedication to ensuring the program remains effective, transparent, and accessible for all stakeholders. We recognize the IPA's efforts to enhance consumer protections, streamline administrative processes, and maintain a fair and competitive renewable energy market. Our comments focus on key areas where further refinements would enhance the program's efficiency and better serve customers, project developers, and other participants.

Subscriber Verification Deadlines

The proposed adjustments to ongoing quarterly and semiannual subscriber verification processes present some practical challenges. As currently written, the requirement that subscriber reports reflect subscribers as of the end of the quarterly period would require projects to be fully subscribed in the utility portal by the end of May or November. Given that utility portals do not always allow administrators to drop and replace subscribers within the same day, project administrators face a multi-day process that is further complicated by the Memorial Day and Thanksgiving holidays. Additionally, utilities may have reduced staffing during these periods, which can create further delays. To mitigate these concerns and ensure an orderly process, we propose extending the subscriber report deadlines to June 15 and December 15. This extension would allow Approved Vendors, Designees, and utilities adequate time to resolve any outstanding issues without undue hardship.

Signature Bundling for Commercial Customers

Regarding Signature Bundling for commercial customers, the Joint Solar Parties urge the IPA to establish a firm deadline for the functionality's implementation. This feature has been referenced in previous iterations of the guidebook for several years but remains unavailable for use. Providing a concrete timeline for deployment will ensure that commercial customers and Approved Vendors can better plan for participation in the program.

Co-Location Pricing Policy

We have significant concerns about the proposed clarifications on co-location pricing, which appear somewhat punitive and do not account for actual project economics. The IPA's proposal to consider projects built on adjacent parcels in separate program years as co-located, and therefore subject to co-located pricing, unfairly penalizes developers and landowners. The benefits of co-location primarily arise from shared EPC contracts, access roads and staging areas, which are unlikely to exist when projects are built in separate years. Any two projects built in subsequent years will not garner any meaningful economies of scale from a lower EPC rate. Any minor cost savings, such as shared access roads, are negligible in the context of total project costs. This proposal also negatively impacts landowners by restricting their ability to lease land for viable projects simply because an adjacent parcel was developed in a prior year. We recommend a fairer approach based on a structured three-factor test similar to that used in New York, which would allow projects to be evaluated more equitably and ensure that landowners maintain access to viable hosting capacity.

Extended Withhold Request Definition

The JSP recommend that the IPA update the definition of the Extended Withhold Request to prevent potential abuse. While we recognize that some projects may require additional time before signing REC contracts and paying deposits, the current framework lacks safeguards to prevent speculative project submissions. Without further constraints, developers could use this mechanism to delay deposits for extended periods, tying up program capacity that could otherwise be allocated to ready-to-build projects. A more structured approach should define the limited circumstances under which an extended withhold is permissible, ensuring that legitimate delays—such as those caused by lengthy interconnection wait times or a reshuffling of the interconnection queue that causes unforeseen delays—are accommodated while discouraging speculative applications.

Minimum Equity Standard Terminology

We also recommend a terminology update related to the Minimum Equity Standard (MES). The term "Project Workforce" has led to confusion, as it does not refer to the workforce of a specific project but rather an entity's entire workforce engaged in Illinois Shines projects. Renaming this category as "Illinois Shines Workforce" would improve clarity and more accurately reflect the scope of MES compliance.

PY Year 2024-25 Minimum Equity Standard Year-End Reporting (Appendix S)

Many construction subcontractors, or lower tier vendors hired by those subcontractors, do not want to provide the below data. There should be a "prefer not to answer" option for these categories:

- Race and gender
- Type of job training program

- Wage per job training program type
- Full-time, part-time, temporary/seasonal, or independent contractors designation

Separately, Approved Vendor legal departments do not feel comfortable asking about the below categories:

- Disability status
- Formerly incarcerated
- Foster care system

Lastly, breaking each EEP out by race, gender, job training program category, and disability status into full-time, part-time, temporary/seasonal, and independent contractors is extremely burdensome and will yield limited useful information because many subcontractors do not want to share this personal information.

TCS Waitlist Scoring Adjustments

Additionally, changes to the TCS waitlist scoring mechanism seem to undermine incentives for non-Equity Eligible Contractors (EECs) to engage in meaningful partnerships with EECs. The removal of an option for projects to receive four points by contracting an EEC for all development scope, along with the reduction in points available for contracting an EEC for up to 75% of REC contract value, diminishes the incentive structure that previously encouraged collaboration. We urge the IPA to reconsider these revisions to maintain strong participation and support for EECs in the program.

Public Schools Re-Allocation of Capacity

The draft Program Guidebook leaves language in the Uncontracted Capacity section referring to the rollover/re-allocation approach from the previous year, which leaves open the question of what the IPA intends to do for the current program year:

Following the *2023-2024 Program Year*, 25% of any uncontracted capacity from the Public Schools category within that category will be rolled over to the following Program Year and the remaining 75% will be allocated to other categories in accordance with the prioritization identified below.

At the time of submission, there are currently around 143MWs of available capacity in Public Schools, compared to ~2MW allocated since the start of the program year. Under last year's re-allocation structure, if nothing changes, around 35MWs will therefore be rolled over into a block that will already have a 107MW allocation for PY 2025-2026 against an annual demand of 2MWs.

The JSP appreciate the continued desire to prioritize a successful Public Schools program, but in the absence of broader changes, continuing to rollover capacity into Public Schools is akin to not allocating those MWs at all. The JSP therefore respectfully requests that 100% of unused

capacity in The Public Schools block from PY 2024-2025 be re-allocated to other categories in accordance with the remaining prioritizations identified in this section.

Conclusion

We appreciate the opportunity to provide feedback and commend the IPA's efforts to refine the Illinois Shines Program. We welcome further discussion on these issues and remain committed to working collaboratively to ensure that the program continues to support solar development, equitable access, and consumer protection.

Respectfully submitted,

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