



Stakeholder Feedback on the Proposed Updates to the Illinois Shines Program Guidebook for the 2025-2026 Program Year

Nelnet Renewable Energy (AV ID: 2044)
204 Carpenter Avenue
Wheeling, IL 60090

To: IPA.Solar@illinois.gov

March 26, 2025

Dear Illinois Power Agency,

Thank you for the opportunity to provide stakeholder feedback on the proposed updates to the Illinois Shines Program Guidebook for the 2025-2026 Program Year. We appreciate the effort invested in updating the Illinois Shines Program and its consumer protection initiatives, which are not just beneficial to the integrity of solar programs across Illinois, but to the energy sector as a whole.

Nelnet Renewable Energy has considered the proposed updates, and our feedback is set out below with specific focus on:

- Section 2.A: Approved Vendor Overview and Requirements
- Section 2.G: Designees and Designee Registration
- Section 5.A: Part I Application Process

Section 2

Approved Vendor Overview and Requirements

It is noted that the Approved Vendor (“AV”) is to ensure that their requisite contact information is up-to-date and reliable. Despite our efforts to provide Program Administration with updated contact information, both through direct communication and through the AV Renewal process, we have encountered repeated issues in receiving key communications. We believe the AV Renewal Form should be the ultimate source for confirming / updating relevant AV contact information, and if any changes occur between renewals, AVs



should be responsible for communicating those changes directly with Program Administrators. Since it is incumbent on AVs to keep their contact information up to date, it should also be incumbent on the Program Administrator to implement that updated information throughout their team.

Designees and Designee Registration

We believe further consideration is needed for the differences between residential and commercial projects, especially those of large-scale, when referring to the recent clarification that '*Direct interaction may mean presence on a DG customer's property*' and that companies '*must register as a Designee, even if the work doesn't fit neatly into these categories*'. There are a wide variety of external parties / subcontractors that may be involved in large-scale solar installations. This may include, but is not limited to, fencers, landscapers, and pavers. Therefore, we do not believe this clarification should be applied to commercial projects but do acknowledge and appreciate the importance of this applying to residential projects.

The implication that any third party who works on the project site must be listed as a Designee creates significant administrative burden, hinders an AV's ability to stay in compliance, and may significantly delay project progress.

This guidance as currently drafted is vague and leaves too much room for confusion. Uncertainty surrounding the roles of Designees and Nested Designees impacts business decisions by limiting the available workforce, particularly for more urgent tasks.

Section 5

Part I Application Process

Considering the limitations of contract reassignment with regards to batch separation, Program Administration making batching decisions on behalf of the AV presents serious concerns. This process limits an AV's strategic participation within the program, delays application progress, impedes contract negotiations, and removes choice for the consumer during their 15-year Contract Term.

Due to ongoing contractual negotiations related to the ownership of IL Shines / ILSFA projects and the potential reassignment of these contracts, we have a unique perspective on the impact of this process. The current limitations on batch separation, coupled with the Program Administration's involvement in creating those batches, result in both AVs and consumers being subject to a process that is beyond their control. Currently, while AVs are notified when a rebatching period opens, we do not seem to be directly informed when the Program Administrator exercises discretion, nor does the Program Guidebook reference an



opportunity to approve or reject that rebatching. We recommend either eliminating the Program Administrator's discretionary rebatching process or allowing more flexibility for batch separation throughout the contract term.

Thank you for your consideration of this feedback. Please do not hesitate to reach out should you require any additional information or wish to discuss further.

Sincerely,

Elise Christianson, Incentives Program Manager
Pam McGuigan, Compliance & Operations Specialist