

Disclosure Form Guidance for 2024-25 Waitlisted Projects, Annual Report Resources, Enforcement of Two Withhold Limit from ICC Meetings

May 16, 2025

Coming up in Illinois Shines (Program events & due dates found at the [Key Dates & Deadlines webpage](#))

- **Events**
 - May 22, 2025 at 12:00 p.m. CPT - Welcome to Program Year 2025-26 webinar (Register at [this link](#))
 - May 27, 2025 at 8:00 p.m. CPT - End of Year Program Pause
 - June 2, 2025 at 8:00 a.m. CPT - 2025-26 Program Year Opens
- **Due Dates**
 - May 19, 2025 – Re-batching opens for AVs
 - May 21, 2025 – Election Deadline for Project Re-Batch or Withdrawal for June 5, 2025 ICC Meeting
 - May 26, 2025 – REC Contract Amendment signature is due AND Part II Verification Cut Off for May
 - May 31, 2025 – REC certificates transfer to Buyer for 2024-25 Delivery Year Annual Report deadline
 - June 2, 2025 – Program Year 2025-26 MES Compliance Plan due
 - June 6, 2025 – 2026 Long-Term Renewable Resources Procurement Plan Stakeholder Feedback deadline

Stakeholder Support

- **Program Administrator Office Hours** – May 21, 2025, from 10:00 – 11:00 a.m. CPT - Individual AV or Designee support for Program requirements, Portal, application, or other questions. <https://energy-solution.zoom.us/j/91402926068>
- **Application Tips and Tricks** - The Program Administrator publishes [Tips and Tricks](#) to help support stakeholders in avoiding project applications from resulting in a *Need Info* request and delaying their review and approval.
 - The Program Administrator follows a protocol regarding the withdrawal/removal of project applications, requiring formal confirmation from the Approved Vendor including AVs who are currently suspended from the Program. As application withdrawals/removals impact available capacity and the review and approval of other project applications, Approved Vendors are understandably interested in capacity that may become available. No action is required of Approved Vendors who are awaiting an update on available capacity resulting from project withdrawals/removals. The Program Administrator will update Approved Vendors as soon as their application becomes free to move forward in the review and approval process, and Approved Vendors need not contact the Program Administrator.

Program News – New or Updated Items (All Program updates can be found on the [Program Updates webpage](#))

- **Partial Portal Closure and Project Application Unavailability May 27 – June 2, 2025** – As [previously shared](#), the 2024–25 Illinois Shines Program Year will close on the evening of Tuesday, May 27, 2025 at 8:00 p.m. CDT and at that time, the ability for Approved Vendors to create, revise, submit, and batch project applications will be paused within the Portal until the launch of the 2025-26 Program Year on June 2, 2025 at 8:00 a.m. CDT. **All Disclosure Form functionality including the ability to create, submit, and sign Disclosure Forms will be fully available during this Program pause period.** Important Information:
 - All Disclosure Form functionality, including the ability to create and submit Disclosure Forms and obtain signatures, will be available during the pause between Program Years
 - Ability to create, revise, submit, and batch project applications will be unavailable in the Illinois Shines Portal from 8:00 p.m. CDT on May 27, 2025, through 8:00 a.m. CDT on June 2, 2025.
 - Project data may be exported from the Application Dashboard prior to the pause. To export data, navigate to Menu: Vendor -> Project Applications -> View. Then apply your preferred Search Filters in the column headings. When you're ready to export, select the "Export Project Data" button at the top of the page.

- **Enforcement of Two Withhold Limit from ICC Meetings** - Per the Program Guidebook, the Program allows for Approved Vendors to only withhold projects from ICC submission twice before they must be withdrawn. This policy will be strictly enforced in conjunction with the start of the 2025-26 Program Year that commences June 2, 2025, beginning with the mom submitted for the June 18, 2025 ICC meeting date. Any projects with more than two withholds at the time this memo is submitted will be put forward for ICC approval. Please see Section C. "ICC Batching and Submission Process" of the 2025-26 [Program Guidebook Rationale Document](#), published April 18, 2025, for further explanation of this policy. When a batch is approved by the ICC, the Approved Vendor will then be required to sign the contract (or Product Order) as approved by the Commission within seven business days of receiving it. Within 30 business days of the ICC approving the contract (or Product Order), collateral constituting 5% of the value of a system's REC Contract must be posted with the utility counterparty in the form of cash or a letter of credit from an underwriter with credit acceptable to the utility. Failure to execute a Product Order or post collateral on time may result in withdrawal of the batch and any associated projects. As a result, the Approved Vendor may face disciplinary measures impacting their status as an Approved Vendor in the Program moving forward. Please see Section 5.A of the [Program Guidebook](#) for more information.
- **Guidance Regarding Disclosure Forms for Projects Waitlisted During Program Year 2024-25** – When a project application becomes waitlisted due to the exhaustion of a Program Year's block capacity, Approved Vendors should use the "Additional Information" section to inform customers that the block capacity for their project has been reached and REC pricing will change to reflect REC prices in effect at the time the project is approved, which Approved Vendors should discuss with customers. The Program has updated the [Circumstances Requiring New Disclosure Form Issuance and Signature document](#) which addresses the circumstance, including:
 - If the amount of pass-through REC incentive changes because project is waitlisted and REC prices change, the customer does NOT need to sign a new Disclosure Form, but the customer must be notified of the change
 - If the amount of the REC incentive that AV receives will change but there is NO CHANGE to amount of pass-through to customer (including if there is no pass-through at all), and there are no changes to other terms (e.g., costs, fees), no action is required
 - If other terms such as costs and fees change (e.g., a lease payment amount increases because the AV is receiving a lower incentive), a new Disclosure Form must be provided to and signed by the customer.
- **Annual Report Resources** – In support of the close of the 2024-25 delivery year and the start of the Annual Reporting period, the Program Administrator created and posted training videos to the Program website's [Program Help Guides and Application Tips](#) page, including:
 - [Annual Report and REC Performance Evaluation Walkthrough](#)— The purpose of the Annual Report, a walkthrough of reviewing project data and submitting supplemental information, and an overview of key deadlines.
 - [Community Solar Parameters Evaluation Walkthrough Video](#)— An overview of the annual subscriber verification process for Community Solar projects under the 2019 REC Delivery Contract, including specific examples of Drawdowns. Please refer to the [Community Solar System Parameters Evaluation \(Annual Subscriber Evaluation\) guide](#) as a supplemental resource.
 - [REC Performance Calculation Evaluation Walkthrough Video](#)— An overview of the Drawdown process for projects on the 15-Year REC Delivery Contracts, including specific examples and the actions Approved Vendors are required to do when projects are subject to Drawdowns. Please refer to the [REC Performance Evaluation guide](#) as a supplemental resource.
 - These on-demand resources enable Approved Vendors to familiarize themselves with the requirements and understand how Annual Report data is utilized to assess REC performance in relation to contractual obligations.
- **Launch of New EEC Application, and EEC Certificates Available for Certified EECs** - The Program Administrator will launch a new application for certification as an Equity Eligible Contractor (EEC), which will be available on the [Become an EEC page](#) on June 2, 2025. The new application will allow EEC applicants to attach required documentation directly to their submission, including a new fillable [EEC Attestation](#), to

streamline the application process by eliminating the need to provide documentation via SharePoint folder. This application will also solicit additional contextual information from applicants including demographic data and business affiliations. **The qualifications for certifying as an EEC will not change with the launch of the new application.** The content of this new application can also be found in the PY 2025-26 Program Guidebook as [Appendix B](#).

On June 3, the Program Administrator will begin issuing EEC Certificates to newly certified and renewed EECs. This certificate may be used for attesting to EEC status to other market stakeholders, including granters. The certificate, like the EEC designation, will have one-year validity, which may be extended upon EEC renewal.

- **2026 Long-Term Plan Workshops Held** – The Illinois Power Agency hosted 2026 Long-Term Plan Workshops on April 30 (Chapter 8 – Illinois Solar for All) and May 1 (Chapters 7 and 10 – Illinois Shines and Equity Accountability System). The Agency and its Program Administrators appreciate the participation and thoughtful perspectives shared by stakeholders at the workshops. The Agency will soon release written questions for stakeholder feedback.
- **Illinois Climate Bank Financing Programs** - The Illinois Climate Bank updated its website with a clean energy project financing page that may be of interest to Illinois Shines Approved Vendors. The page is available at: <https://www.illinoisclimatebank.com/financing-programs/K>
- **Updated Designee Registration Form** – An updated [Designee Registration Form](#) is now available, incorporating the Maintenance and Repair Designee type for entities that perform routine maintenance, monitoring, and/or repair to a system after installation. The registration process for Designees and Nested Designees remains the same and Approved Vendors should expect a 2-4 week turnaround time for Designee registration requests.
- **New to the Program Website** – The following key additions to <http://www.IllinoisShines.com> have been shared:
 - Updated [Circumstances Requiring New DF Issuance and Signature](#) (Program Documents page)
 - [Minimum Equity Standard Compliance April 15, 2025 webinar Q&A](#) (Program Year Webinars page)

Program News – Previously Published Items (All Program updates can be found on the [Program Updates webpage](#))

- **2025-26 Program Year Welcome Webinar** - June 2, 2025 marks the opening of the 2025-26 Program Year. In support of stakeholders, an informational webinar on the upcoming 2025-26 Program Year changes will be held on May 22, 2024 from 12:00 - 1:00 p.m. CPT. The webinar will be recorded. The Program Administrator and IPA will discuss the 2025-26 Program Year Program Guidebook, the 2025-26 Consumer Protection Handbook, updated REC capacity and prices, and more. Please use [this link](#) to register for this event.
- **Minimum Equity Standard (“MES”) 2024-25 Year-End Reports and 2025-26 Compliance Plans** – On April 30, [the Program announced](#) that MES Program Year 2025-26 Compliance Plans opened for submission and are due on June 2, 2025. **Please refer to an email from the Program Administrator on April 30 for your organization’s secure submission link and access code, and email mes@illinoisshines.com if you are having trouble accessing the form.** On April 24, [the Program published](#) resources and guidance to support 2024-25 MES Year-End Report submissions, including key dates and details. The announcements followed an April 15 MES Compliance webinar providing guidance and schedule information for both Program Year 2024-25 Year-End Reports and Program Year 2025-26 MES Compliance Plans. Further information is available at the Program’s [Equity Accountability System hub](#), and a [recording of the webinar](#), [presentation slides](#) and a [Q&A document](#) can be found at the [Program Year Webinars](#) page.
- **IPA and Illinois Shines Launch Solar Restitution Program** – [On May 5, 2025](#) the IPA and Illinois Shines Program Administrator announced the launch of the Solar Restitution Program (“SRP”). The SRP, which is designed to provide economic compensation to customers harmed through their participation in Illinois Shines or Illinois Solar for All, was first outlined in the 2024 Long-Term Renewable Resources Procurement Plan and was further developed through a stakeholder process in the Fall of 2024; a [Rationale Document](#) responding to stakeholder feedback and explaining final design and implementation decisions was published on April 28, 2025. While most customers have a positive experience in connection with the Agency’s programs, there are unfortunately still entities that cause economic harm to customers, and the SRP is a new tool that allows the Agency and Program Administrator to help provide financial restitution to customers who have experienced such harm in certain circumstances. Phase I of the SRP will provide compensation to customers who were promised a pass-

through of the Illinois Shines REC incentive payment by their Approved Vendor but did not receive the promised payment, in situations where the Approved Vendor in fact received the REC incentive from the utility. Later phases of the SRP will expand the scope to other types of harm. Additional information about the SRP can be found at <https://illinoisshines.com/solar-restitution-program/>.

- **Corrections to Program Year 2025-26 Program Guidebook** – On May 5, 2025, the Program announced updates made to the Program Year 2025-26 Program Guidebook released on April 18, 2025. There were no new requirements introduced in the update but rather clarifications to items already published in other documents as well as corrections of formatting issues in order to better delineate requirements. Please see [the full announcement](#) for details. On April 18 the Program published updated versions of the Program Year 2025-26 Program Guidebook, Consumer Protection Handbook, Distributed Generation (DG) and Community Solar (CS) Contract Requirements, and 2025-26 REC Prices, which conform with the Illinois Commerce Commission's (ICC's) Final Order on the IPA's 2024 Long-Term Renewable Resources Procurement Plan, dated February 20, 2024, and other stakeholder feedback processes. The documents are published 45 days in advance of the start of the 2025-26 Program Year in order to provide transparency and time to review changes prior to the compliance period, and Program participants are required to be in compliance with requirements outlined in the documents by June 2, 2025 and throughout the 2025-26 Program Year. **The April 18, 2024 versions of the Program Guidebook, the Consumer Protection Handbook, Distributed Generation (DG) and Community Solar (CS) Contract Requirements, and 2024-25 REC Prices remain the effective versions of the documents until the new Program Year commences on June 2, 2025.**
- **Reminder: REC Contract Amendments Signatures Due May 26, 2025** – On March 24, REC Contract Amendments were distributed to utilities, who had until April 11, 2025 to sign them. Following utility signature, the documents are automatically routed via Docusign to each AV with an active REC Contract for their signature by May 26, 2025. **It is critical that AVs sign the amendment within 45 days, by 11:59 p.m. CPT on May 26, 2025. Failure to do so is considered a Program violation and may lead to suspension.** A [Frequently Asked Questions \("FAQs"\) document](#) was created to support AVs. If you **did not received a request through the signature platform, Docusign, to sign the amendment**, are having technical difficulties, or if you have other questions or concerns, please email the Program Administrator at admin@IllinoisShines.com as soon as possible.
- **Upcoming REC Transfers in Preparation for the 2024-25 Annual Report** – As a reminder, RECs delivered between June 1, 2024 - May 31, 2025 are considered to be within the "2025 delivery year." AVs must successfully transfer RECs to the Buyer during this timeframe in order to be used to calculate any necessary collateral adjustments or contract default for the 2024-25 Annual Report. As AV's prepare for the 2024-25 Annual Report, keep the following in mind:
 - The Buyer counts RECs based on when they are *successfully transferred*, **not** when they are generated.
 - Upload all available energy generation data to GATS **before May 23, 2025**, since data processing and REC certificate creation **may take up to seven days**. Once created, **transfer the REC certificate to the Buyer before 11:59 p.m. CPT on May 31, 2025.**
 - **Ensure RECs are delivered before May 31, 2025, as any REC delivered after this deadline will not count toward the 2024-25 Delivery Year Annual Report.**
 - For AVs with systems eligible for the 3-Year Rolling Average Collateral Drawdown process, upload all available energy generation data before May 23, 2025 **to minimize potential Drawdowns on posted collateral.**
 - *Although M-RETS processes Generation Data instantly (creating and transferring RECs per a standing order within moments), AVs should act early out of an abundance of caution.*
- **Small DG Soft Close Concluded; Waitlist in Effect** – On May 1, 2025, the annual block of capacity for the Small DG block was filled, and on May 6, 2025 the soft close period for the block concluded. New capacity for the category is planned for the 2025-26 Program Year and expected to be available on June 2, 2025.
- **Public Schools Case Study Now Available** – On May 1, the Program published its first case study, highlighting [how one Illinois school district turned to Illinois Shines](#) to achieve important financial and environmental benefits for its community.

Ongoing Operations Updates

- **Re-Batching for ICC Meetings** – Due to an increase in late requests to withhold projects from submission to the ICC, the Program Administrator would like to remind AVs of the important information below.

In advance of each submission of batches to the ICC for approval, AVs are provided the opportunity to withhold or re-batch projects. AVs must indicate any requests to withdraw or withhold projects during the two-day re-batching window. In the absence of any action by an AV, the Program Administrator will re-batch the projects at their discretion and submit eligible projects to the ICC.

- It is extremely important that AVs review their re-batching files on SharePoint to indicate any re-batching preferences, but especially requests to withhold projects from submission. The Program Administrator alerts AVs by email when they have projects that are eligible for re-batching and planned to be submitted to the ICC in the next memo. Unfortunately, sometimes these communications are missed, and projects are submitted to the ICC despite an AVs intent to hold a project back.
- The Program Administrator requests that AVs who believe they may want to withhold or re-batch projects mark their calendars and review SharePoint folders for re-batching templates. This way, if any email alerts are missed, AVs are still aware of the dates that re-batching opens and can check if any projects are in the upcoming ICC submission. Below are the next re-batching windows:

Re-Batching Opens for AVs	Election Deadline – 12:00 p.m. CPT (Re-batching closes for AVs)	Trade Date (ICC Meeting Date)
5/19/2025	5/21/2025	6/5/2025
6/2/2025	6/4/2025	6/18/2025
6/13/2025	6/17/2025	7/2/2025
6/30/2025	7/2/2025	7/17/2025

- **Part II Verification Cut Off for May** - To allow time for invoice calculation and generation, the last valid Part II Verification date for May will be May 26, 2025. Applications that were Part II verified on or before May 26, 2025 will be included in the June invoicing period. Application processing will continue throughout the last week of the month and any applications that are reviewed between May 27, 2025 and May 31, 2025 will be invoiced in July 2025.

Application Processing Updates

- **Application Processing Tables** - Application processing tables are maintained at IllinoisShines.com/project-application-reports/. These tables are updated daily. For questions about specific project applications, please contact the Program Administrator at admin@IllinoisShines.com.
- **Application Processing Update** - Current application processing time is within the expected 10-day turnaround in all categories, which the Program Administrator expects to maintain for the foreseeable future.

Ongoing Program Portal Updates

- The latest Portal updates and enhancements, a Portal Development Roadmap, and Portal help guides can be found at <https://illinoisshines.com/portal-updates/>.
- **Portal Maintenance and Releases** - Scheduled system maintenance windows will continue on **Tuesday and Thursday evenings (from 8:00 p.m. to 11:00 p.m. CPT)**, during which times the Portal is typically unavailable to users; the Program hopes these windows are minimally disruptive to Program participants. **Users working in the Portal should save their work prior to the 8:00 p.m. CPT start of system maintenance window, as any unsaved information will be lost when the system is moved into maintenance mode.** In some cases, Portal availability may resume earlier than noted, though **AVs and Designees should plan on the full three hours.**

Development Focus	Details	Planned or Actual Delivery
Enhancement		

Update DG Over 25kW Part 1 Documents Upload text (append "/ Proof of Interconnection Approval" to "Signed Interconnection Agreement")	Starting from the new 2025-2026 Program Year, Proof of Interconnection Approval can be submitted in lieu of Signed Interconnection Agreement for the Part 1 Documents Upload of DG projects over 25 kW. The text in the Document Upload page of the portal has been updated to reflect this.	May 14, 2025
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Requirements and Reminders

- **Stakeholder Feedback** – This table outlines current and forthcoming proposals and feedback requests. Details on previous proposals and feedback requests can be found [at the Program website](#).

Proposal or Feedback Topic and Link to Details	Request for Comment Released	Deadline for Comment	Results or Updates to Request
Equity Eligible Contractor Certification	April 1, 2025	April 18, 2025	Comments to be published
Draft Program Guidebook	March 7, 2025	March 26, 2025	Corrected version of April 18, 2025 version ; compliance required by June 2, 2025.
Draft Consumer Protection Handbook	March 7, 2025	March 26, 2025	Final version released April 18, 2025 ; compliance required by June 2, 2025.
Draft DG Contract Requirements	March 7, 2025	March 26, 2025	Final version released April 18, 2025 ; compliance required by June 2, 2025.
Draft CS Contract Requirements	March 7, 2025	March 26, 2025	Final version released April 18, 2025 ; compliance required by June 2, 2025.
Draft REC Prices	March 7, 2025	March 26, 2025	Final REC Prices published April 18, 2025 .
CS Subscriber Management Function	Survey issued April 7, 2025	April 21, 2025	Results of stakeholder survey under evaluation by Program for requirements updates.

- **IPA Request for AVs and Installer Designees Interested in Serving Stranded Illinois Shines DG Customers** - As previously [announced](#), the Program seeks entities interested in serving stranded customers, and [updates the lists](#) of participating vendors on a rolling basis. The original announcements include details regarding the opportunity to support stranded customers, eligibility requirements, and anticipated responsibilities.

CONTACT US: For Portal, application, or Program-specific questions and inquiries, please contact admin@IllinoisShines.com or call 877-783-1820.