



Illinois Shines Program Year 2024-25

Minimum Equity Standard Year-End Report Implementation Report

Public Release

November, 2025

Contents

Overview.....3

 Summary.....3

Program Year 2024-25 MES Year-End Report Process Improvements4

 Comparison with Program Year 2023-24.....4

 Program Year 2025-26 Improvement Recommendations.....6

Data Analysis7

 Submission Metrics.....7

 Rating Distribution7

 Equity Eligible Person (EEP) Representation and Demographics.....7

 Total Workforce Demographics9

 Workforce Residency 10

 Key Takeaways from Data.....11

 EEC Partnerships11

 Challenges and Obstacles in Meeting the MES.....11

 Union Entities 14

 Positive Feedback about the MES 15

 Identified Outreach Methods..... 15



Overview

Summary

The purpose of the Minimum Equity Standard (MES) Year-End Report process is to, on an annual basis, educate Approved Vendors (AV) and Designees on this Program requirement; manage communications; and receive and rate AV/Designee reports to ensure compliance with the MES. This report is a summary of the Year-End Report implementation process for the 2024-25 Program Year, and provides insights into data analyzed to date, unique excerpts from the outreach narratives submitted, and recommendations for process improvements for future Program Years.

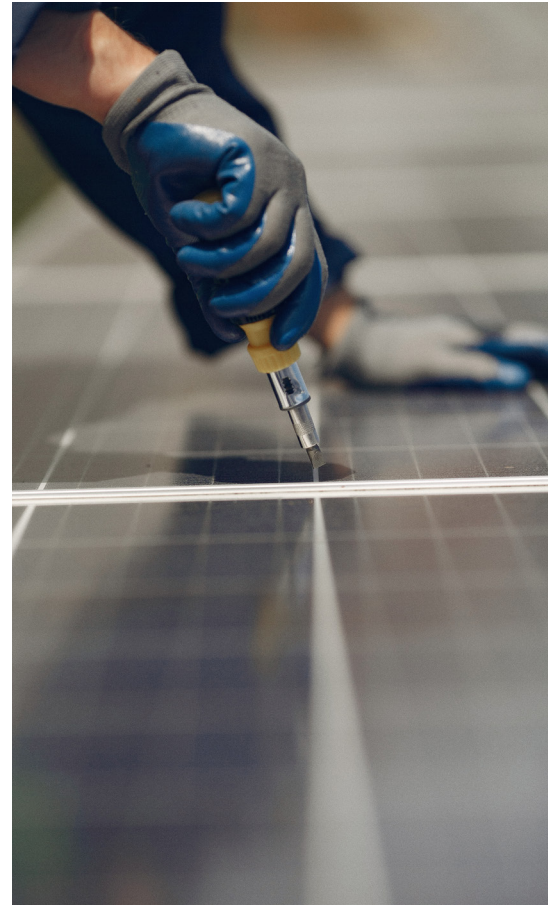
MES Year-End Reports were due from all participating entities on July 15, 2025, showing their compliance with the 10% MES requirement for the 2024-25 Program Year. For more information regarding the Minimum Equity Standard and the MES Year-End Report, please visit illinoisshines.com/minimum-equity-standard.

Although the majority of reports were submitted by the deadline, there were late submissions despite the many automated reminders that were sent to all Program participants. The submission rate for the current MES Year-End Report cycle saw a big improvement from last year, as shown in the Comparison with Program Year 2023-24 section.

Of the 794 Year-End Reports received as of 9/24/25 for Program Year 2024-25:

- 364 Year-End Reports received “pass” ratings
- 181 entities indicated that they did not participate in Program Year 2024-25
- 15 entities failed to file a Report and were suspended from the Program on 9/19/25
- 11 entities will be receiving “fail” ratings

Based on all Reports received for Program Year 2024-25, the reported project workforce total was 12,278. Of that total, 2,129, or 17% were Equity Eligible Persons (EEPs). A more detailed breakdown of the data received in MES Year-End Reports can be found in the Data Analysis section.



Program Year 2024-25 MES Year-End Report Process Improvements

There were improvements to the 2024-25 MES Year-End Report process from the previous year's reporting period resulting from the implementation of the new platform for MES reporting, as well as a greater understanding within the market of the Program's MES requirements. These improvements included:

- **PowerPages Automations** – The new platform employed for 2024-25 MES Year-End Reports allowed for significant automations that improved user experience, including:
 - Auto calculations and verifications including a pop-up window when MES workforce totals did not achieve the required 10%
 - Inability to move forward with submission if demographic totals did not add up to the project workforce total
 - A separate EEP documentation field for each EEP identified in the project workforce, which required submitters to enter the person's name and upload required documentation for any EEPs not registered in the Equity Portal
 - Regularly scheduled, automated reminders sent through the platform improved MES Year-End Report submission rates
 - Automated “pass” emails sent through the platform
 - Reduced staff time needed to intake and review MES Year-End Report submissions
- **Widespread market understanding of MES requirements** – With the 2024-25 MES Year-End Reporting process marking the end of the second full year of MES implementation, program participants have demonstrated a better understanding of the requirement. Over the past Program year, we saw:
 - Fewer calls into office hours with MES-related questions
 - Fewer emails with MES-related questions
 - High attendance rates for the annual MES webinar
 - Better submission rates from AVs and Designees

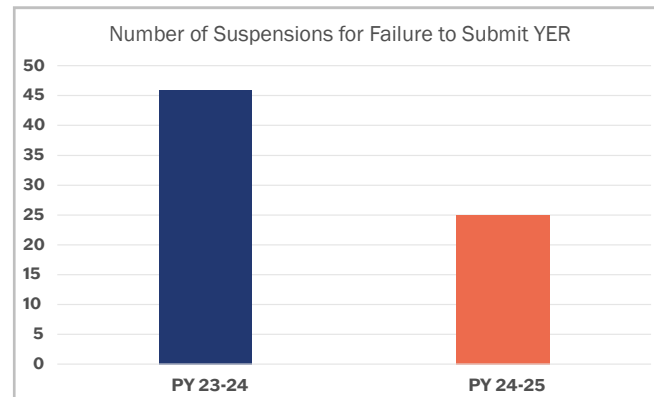
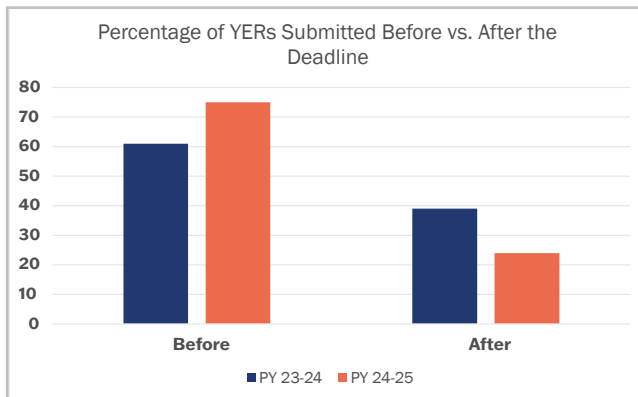
Comparison with Program Year 2023-24

Submission Rates

The submission rate for the current MES Year-End Report cycle saw a big improvement from last year, as shown below:

- **For the 2024-25 MES Year-End Report**
 - 595 Year-End Reports (75%) were submitted prior to the July 15th deadline
 - 199 Year-End Reports (25%) were submitted after the deadline
 - 15 entities were suspended on September 19, 2025 for failure to submit their MES Year-End Report

- **In comparison, for the 2023-24 MES Year-End Report**
 - 544 Year-End Reports (61%) were submitted prior to the July 15th deadline
 - 349 Year-End Reports (39%) were submitted after the deadline
 - 46 entities were suspended on December 9, 2024 for failure to submit their MES Year-End Report
 - *Please note the greater volume of 2023-24 MES Year-End Report submissions because many entities with multiple Single Project Approved Vendors submitted one Year-End Report per AV, and we had a good number of withdrawn AVs and Designees between Program Years. For the 2024-25 Program Year, we encouraged AVs to submit one MES Year-End Report for their full portfolio of participating vendors.*



Disciplinary Timelines

With fewer manual steps in the MES Year-End Report intake and review process, the Strategy Team was able to advance the disciplinary timeline for MES Year-End Report submissions by a few months. The chart below shows the dates of disciplinary steps for MES Year-End Reports for the previous 2023-24 Program Year reporting cycle, compared to this year's, reflecting a vast improvement.

Disciplinary Step	PY 23-24	PY 24-25
NOPV for failure to submit MES YER	7/19/2024	8/6/2025
Warning Letter for failure to submit MES YER	10/22/2024	9/3/2025
Suspension Letter for failure to submit MES YER	12/9/2024	9/19/2025
Notice of Non-compliance to entities that failed to meet the MES	12/20/2024	10/14/25
Suspension Letter for entities that failed to meet the MES	1/21/2025	To be sent in mid-November

Communications and Reminders

The new PowerPages platform used for MES reporting allowed for automated email reminders to be sent on a regular basis to entities that failed to submit their Year-End Report. These reminders were going out to entities with missing submissions every two days, in addition to the Friday Program announcement. The addition of these automated reminders greatly improved submission rates. For the 2023-24 MES Year-End Report due in June 2024, entities received **5 email reminders** of the Year-End Report deadline. For the 2024-25 MES Year-End Report, entities with missing submissions were reminded of the deadline a **total of 26 times** across various channels.

Seeing a benefit to the activity last year, this year the team also incorporated a phone call campaign to gather last minute submissions after the deadline. Entities who had not submitted their Year-End Report by the deadline received a call from our team the week of 7/23. In total, about 170 entities were called, resulting in 86 additional submissions.

Program Year 2025-26 Improvement Recommendations

The Program Strategy Team has brainstormed the following process improvements for the next Program Year to address continued issues with MES Year-End Reporting.

Issue	Process Improvement
Entities continue to be confused about the two separate MES Reports due during the summer months.	Consider combining the MES Compliance Plan and Year-End Report into one submission due over the summer. This will reduce administrative burden for Program participants. It will also vastly reduce the number of emails and phone calls we get in response to submission reminders – many entities thinking they have submitted their MES reporting for the year, but they only submitted their Compliance Plan for example. The Agency has proposed this recommendation in their filed 2026 Long-Term Plan.
Many entities respond to the MES Year-End Report stating that they did not participate in the Program during the Program Year, but our records show that they did. This results in back and forth and delays getting completed Year-End Reports from these entities.	Consider tailoring the list of AVs and Designees we send the MES form(s) to based on participation records in the Program Portal.
Many submissions list non-EEC companies in the field that asks for the EEC entities the AV/Designee worked with during the Program Year.	We are looking into a search function for this field, where it is pre-filled with approved EECs, and entities can only select from that list.

Data Analysis

Submission Metrics

As of September 24, 2025, 794 MES Year-End Reports were received from unique entities:

- 330 submissions from Approved Vendors
- 368 submissions from Designees
- 96 submissions from entities that participate as both

We are still receiving a few late MES Year-End Report submissions from entities that have received the suspension letter for failure to submit.

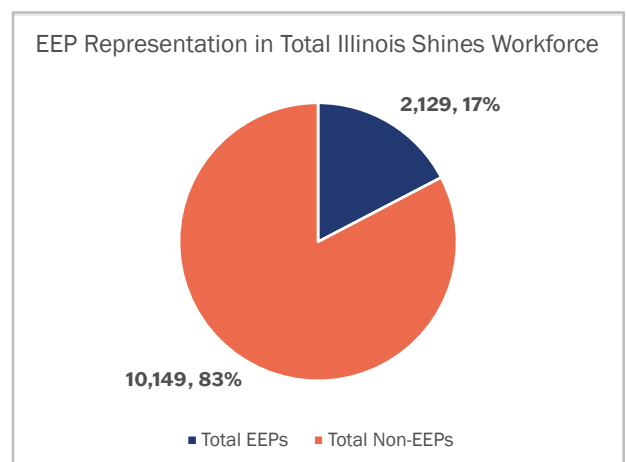
Rating Distribution

- 364 MES Year-End Reports were rated as Pass/Compliant, meaning the entity met the required 10% MES for the Program Year, and all EEPs were verified by the Program Administrator
- 11 MES Year-End Reports were rated as Fail/Non-compliant
- 181 entities reported in their MES Year-End Report that they did not participate during the 2024-2025 Program Year.
 - 30 additional entities responded that they did not participate in the Program, but our records show that they did. We have followed up with these entities for a more accurate submission.
- 120 MES Year-End Reports are currently in 'Need Info' Status. Reasons for Need Info requests include:
 - Small businesses with fewer than 10 employees that noted that they did hire during the Program Year but were unable to hire an EEP. These entities (~28 in total) were sent guidance about the [Safe Harbor Approach](#) and many are pending supplemental document submission showing the outreach efforts made.
 - Most Need Info requests are regarding supplemental documentation needed for EEP verification
- 15 entities were suspended from the Program for failure to submit an MES Year-End Report

Equity Eligible Person (EEP) Representation and Demographics

- Total number of employees/workers on Illinois Shines projects (compiled): **12,278**
- Total number of current EEPs (compiled): **2,129**

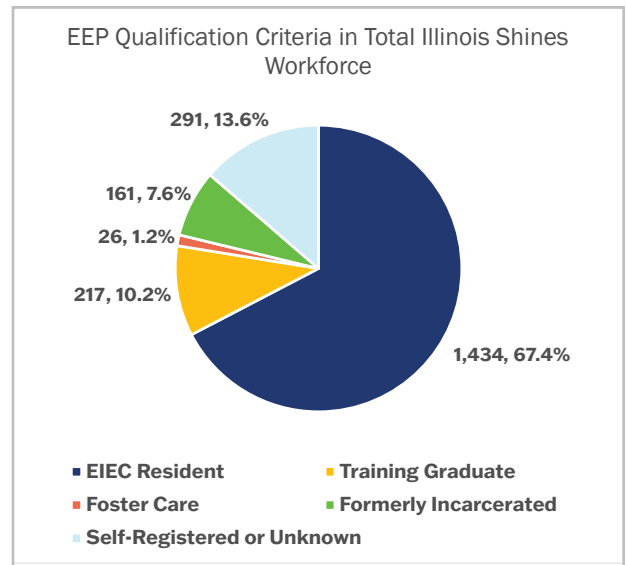
The reported Illinois Shines Program workforce is currently made up of **17%** EEPs. For comparison, from the 2023-24 Program Year MES Year-End Reports, the EEP percentage was also **18%**. While the percentage of EEPs in the workforce went down slightly between Program Years, the total number of workers grew significantly, as did the total number of EEPs hired on projects.



Qualification Criteria

Of the 2,129 EEPs reported, they qualify as EEPs in the following ways:

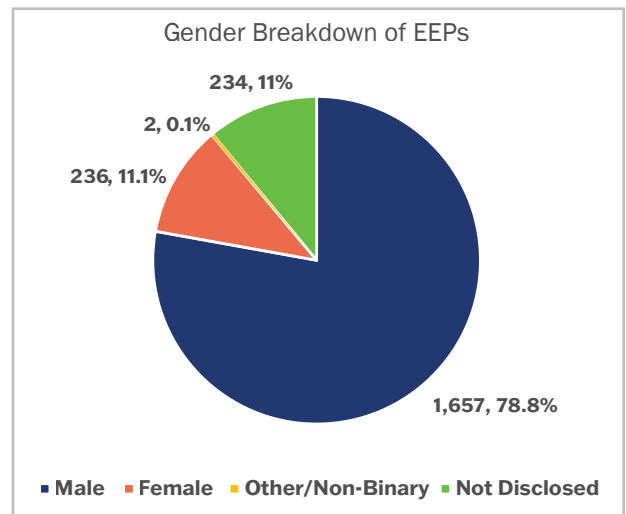
- 67.4% of EEPs live in an Equity Investment Eligible Community (1,434 reported)
- 10.2% of EEPs graduated from or are current participants in a qualifying workforce training program (217 reported)
- 1.2% of EEPs are foster care graduates (26 reported)
- 7.6% of EEPs were formerly incarcerated (161 reported)
- 13.6% of EEPs have an unidentified qualification due to self-registration in the Energy Workforce Equity Portal, or their eligibility criteria was unknown to the AV/Designee



Gender

Of the total EEPs reported by AVs and Designees in their MES Year-End Reports, the gender breakdown of EEPs in the Illinois Shines project workforce is as follows (by percentage of the aggregated EEP total):

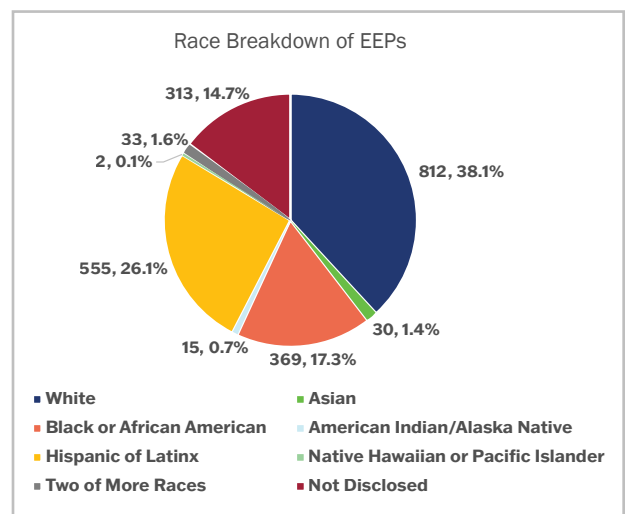
- 77.8% Male (1,657 reported)
- 11.1% Female (236 reported)
- 0.1% Other/Non-Binary (2 reported)
- 11% Did not self-identify/not disclosed (234 reported)



Race

Of the total EEPs reported by AVs and Designees in their MES Year-End Reports, the race breakdown of EEPs in the Illinois Shines project workforce is as follows (by percentage of the aggregated EEP total):

- 38.1% White (812 reported)
- 17.3% Black or African American (369 reported)
- 26.1% Hispanic or Latinx (555 reported)
- 1.4% Asian (30 reported)
- 0.7% American Indian or Alaska Native (15 reported)
- 0.1% Native Hawaiian or Other Pacific Islander (2 reported)
- 1.6% Two or more races (33 reported)
- 14.7% Did not self-identify/not disclosed (313 reported)



Disability

- 0.3% Disabled (7 reported)
- 30.2% Did not self-identify/not disclosed (642 reported)
 - Note: the disabled field did not require the total reported to match the project workforce total

Employment Status

- 80.2% Full-Time (1,707 reported)
- 2.7% Part-Time (57 reported)
- 3.1% Temporary/Seasonal (65 reported)
- 14% Independent Contractors (299 reported)

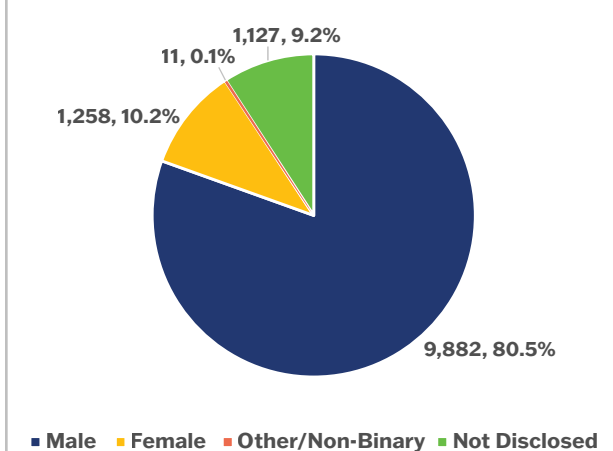
Total Workforce Demographics

Of the workforce reported by AVs and Designees in their MES Year-End Reports, the gender and race breakdown of the entire Illinois Shines project workforce is as follows (by percent of the aggregated total):

Gender

- 80.5% Male (9,882 reported)
- 10.2% Female (1,258 reported)
- 0.1% Other/Non-Binary (11 reported)
- 9.2% Did not self-identify/not disclosed (1,127 reported)

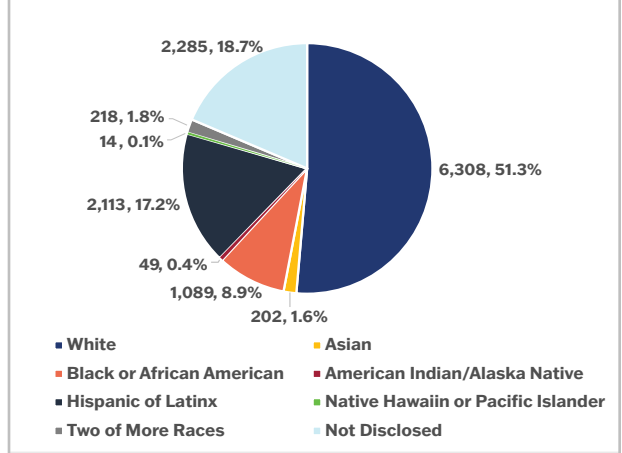
Gender Breakdown of Total Illinois Shines Workforce



Race

- 51.3% White (6,308 reported)
- 8.9% Black or African American (1,089 reported)
- 17.2% Hispanic or Latinx (2,113 reported)
- 1.6% Asian (202 reported)
- 0.4% American Indian or Alaska Native (49 reported)
- 0.1% Native Hawaiian or Other Pacific Islander (14 reported)
- 1.8% Two or more races (218 reported)
- 18.7% Did not self-identify/not disclosed (2,285 reported)

Race Breakdown of Total Illinois Shines Workforce

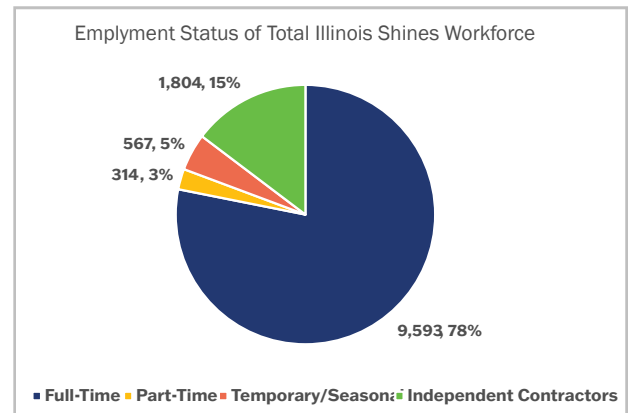


Disability

- 0.5% Disabled (63 reported)
- 35% Did not self-identify/not disclosed (4,392 reported)
 - Note: the disabled field did not require the total reported to match the project workforce total

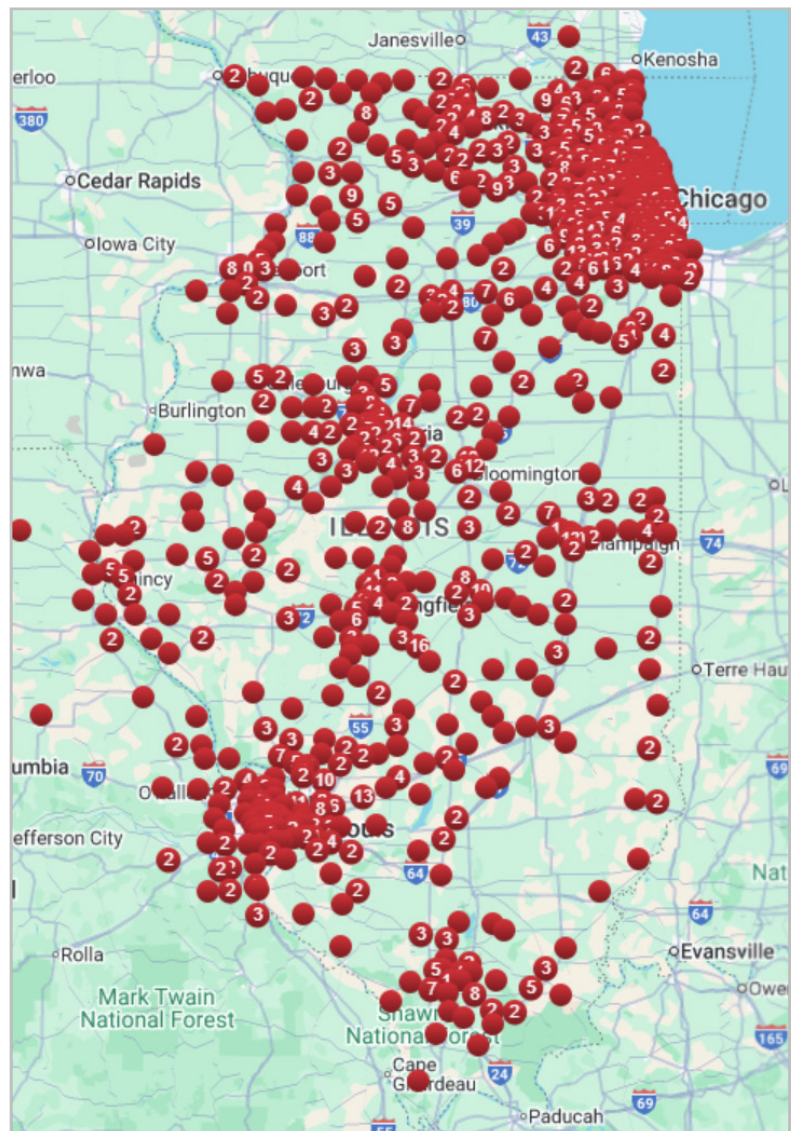
Employment Status

- 78.1% Full-Time (9,593 reported)
- 2.6% Part-Time (314 reported)
- 4.6% Temporary/Seasonal (567 reported)
- 14.7% Independent Contractors (1,804 reported)



Workforce Residency

In their MES Year-End Reports, Program participants were asked to provide primary residence zip codes for individuals in their Illinois-based Illinois Shines project workforce. After mapping the zip codes submitted, the Illinois Shines project workforce appears to cover much of the state of Illinois, with some gaps in the southeast and west parts of the state. Most individuals appear to live in Cook County, and the St. Louis area. See map for detail.



Key Takeaways from Data

- The overall MES percentage for the total Illinois Shines project workforce has remained at around 17% since the start of MES implementation. Data analyzed from the 2023-24 MES Year-End Reports showed an aggregate MES percentage of 18%, and 2024-2025 is 17%, surpassing the 10% MES requirement. This is promising for the 2025-26 Program Year, with the percentage increasing to 14%.
- EEPs involved in the Program represent a more diverse group than the total Illinois Shines project workforce. In the aggregated Illinois Shines project workforce, 8.9% of employees are Black or African American, and 17.2% are Hispanic or Latinx. In the EEP sub-group, these percentages jump to 17.3% and 26.1% respectively.
- The representation of women in the Illinois Shines project workforce has decreased a bit since the previous Program Year. In 2023-24, women represented 16.3% of the workforce, and this Program Year, 10.2%.
- This year's MES Year-End Reports had more submitters responding that their employees "did not disclose" or "preferred not to answer" questions related to demographic information, which may skew some of the data. In 2023-24, 10.7% of respondents said that their employees "preferred not to answer" questions related to race, and this year, 18.7% of employees "did not disclose" race information to the AV/Designee completing the report.

EEC Partnerships

Of the 794 entities that submitted an MES Year-End Report, 153 or 19.3% of AVs and Designees reported that they partnered with Equity Eligible Contractors during the 2024-25 Program Year. 10 Equity Eligible Contractors were noted to the Agency as the most commonly mentioned EECs in MES Year-End Reports, with each one mentioned 3-9 times.

Challenges and Obstacles in Meeting the MES

In their MES Year-End Report narratives, many entities responded to the open-ended questions to voice the challenges and barriers they are experiencing when working toward MES compliance. Common themes included challenges finding local EEPs with necessary skillsets, MES reporting being time consuming, and a sentiment that asking for EEP eligibility during hiring is inappropriate. Excerpts from some of these MES Year-End Reports are included below.

“We’ve been able to meet the MES requirements, **but it’s not always easy**. We hire based on skill and experience rather than specifically looking for EEP qualifications. While this works well for us in terms of getting the right people, it can sometimes make it harder to meet certain EEP-based requirements. That said, we’ve found ways to work through those challenges and still stay on track.” (Illinois Shines Participating Solar Vendor)

“This has been a difficult process for us. The idea of the MES standards is nice, but not applicable when enforcing on a small-town company located in the middle of nowhere Illinois. We are not a hugely populated area, we have small towns of 500-3,500 people and the towns are 10-20 miles apart, so to meet these requirements, it feels created to facilitate a city/metro population which does not fit our company. Fortunately we have team members that live within that area that allows us to meet the mandated requirements of this program. I do want to note - **this program is a bit invasive and overstepping in how it is created** and I personally do not feel it is my place during the hiring process to ask if an applicant is a graduate of a foster care program or has ever been incarcerated. These are not things that seem appropriate to ask a person. We do not mind if a person comes to us that meets either of these criteria, but I do not feel it is my place to ask this from my team members. I want to respect their privacy.” (Illinois Shines Participating Solar Vendor)

“We primarily do residential installations. Hiring those that have been formerly incarcerated **creates possible issues** for our customer homeowners who are not home during the day when we are doing installations. The two Work Force Development Programs administered through the community colleges listed are both about 90 miles from our office, so if we did want to hire a graduate at some point, they would need to relocate in order for us to hire him/her.” (Illinois Shines Participating Solar Vendor)

“The only obstacle is **many of the subcontractors have never heard of MES/EEP’s**, so we explain as best we can and encourage them to use them in their workforce.” (Illinois Shines Participating Solar Vendor)

“The only obstacle that we have faced is having current employees complete **portal registration** or provide us the required documentation to be included as an EEP. As such, we have focused on using the portal as a resource.” (Illinois Shines Participating Solar Vendor)

“Having some of the job programs taking a long time to reach back out to us. Due to the **shifting political landscape** of the last 10 months or so, it has led to industry wide disruption which has forced many AVs to downsize their workforce. Hiring new employees while downsizing the current workforce can add to the already stressed finances of some AVs.” (Illinois Shines Participating Solar Vendor)

“One challenge or obstacle is our **geographic region does not seem to have an abundance of qualified EEP’s** that are willing to do solar installation. The size of our team is small, and the effort required to find/attract and retain EEP’s is significant.” (Illinois Shines Participating Solar Vendor)

“While we have been compliant, it’s a **discrimination** to exclude one qualified applicant to choose another one based on falling into an MES qualification when the 1st qualified applicant may or may not be a better candidate. This is no different than choosing one employee over another based on race, religion etc. We have been lucky to have qualified candidates who live in the map and happen to be the best fit for our needs in other ways.” (Illinois Shines Participating Solar Vendor)

“Obstacles have been the **amount of time for paperwork**. I spend way more time filling out SREC associated paperwork and required forms than I do actually installing solar for each.” (Illinois Shines Participating Solar Vendor)

“We did receive some pushback from employees when we requested that they **self-register in the portal**. They were not keen on the idea of needing to do this but confirmed that it had been completed nonetheless.” (Illinois Shines Participating Solar Vendor)

“The biggest challenge has been requesting information from all staff members regarding the four (4) MES qualification criteria and requesting their race/ethnicity and gender. These are **very charged topics, and very sensitive**. Illinois Power Agency is doing a good thing by providing EEPs an opportunity to work in the clean energy space, and we appreciate that, but please understand that our team members do not wish to share these topics with anyone. And they especially do not wish to discuss them with their employer or send them to an outside agency.” (Illinois Shines Participating Solar Vendor)

“Simply tracking MES is **costly and time-consuming**. There is friction in the process of verifying employees in the portal. Many employees simply don’t want to register with a government agency. Others understandably don’t want to disclose their status as a formerly incarcerated individual or graduate of the foster care system.” (Illinois Shines Participating Solar Vendor)

“Our subcontractors, particularly those that are smaller and less familiar with IL Shines requirements, generally **found this process to be very burdensome and intrusive**. Generally speaking, even though it’s usually feasible in theory to meet MES requirements given the actual residence and personal history of many workers in the solar industry, it’s difficult from a practical standpoint to meet MES requirements given the sensitivity of the information requested (and resulting questions about appropriateness), the breadth of the definition of Illinois workforce (which can capture even incidental subcontractors or subcontractors without sufficient resources), and lack of training and information about MES compliance and reporting needs until close to the applicable deadlines.” (Illinois Shines Participating Solar Vendor)

Union Entities

44 entities identified themselves as union-affiliated contractors in the narrative portions of their MES Year-End Reports. Most of these entities noted that all hiring happens through their local union hall, and that they do not have control over the individuals provided for their projects. Excerpts from some union AV/Designee MES Year-End Reports are included below.

“We are a union shop so we can only take guys that are assigned to us, we express when asking for add’l workforce that we will be doing solar work, however, **I don’t believe that the union takes into consideration the EEP criteria.**” (Union-Affiliated Contractor)

“We were in contact with the local IBEW Union Halls to discuss the requirements of the EEP categories and they helped us promote our open positions to applicable groups. We continued to submit our job needs to the IBEW where the IBEW then posted them to their members via online job boards for their members to accept the calls. We had **frequent check-ins** with the Union Halls to analyze the individuals filling our jobs through the Union’s job postings, to see if they fit EEP criteria.” (Union-Affiliated Contractor)

“We are a union electrical contractor. We rely on the union to supply us with EEPs. **They are doing every thing they can** to broaden their search for more equity eligible people.” (Union-Affiliated Contractor)

“We are only able to hire from IBEW 134 union and are unable to recruit/hire directly from FEJA/CEJA training programs. The IBEW 134 union does train new apprentices on solar installations and we have seen **positive results from this training program.**” (Union-Affiliated Contractor)

“There have been several obstacles in meeting the MES. As a Union Contractor, all of our electricians are skillfully and meticulously trained in their craft, but that is not a recognized segment to qualify as an EEP. Furthermore, as a Union Contractor, we are **limited in who we can hire** and have to rely on the Local Union Hall rules and bylaws when it comes to hiring new electricians and apprentices.” (Union-Affiliated Contractor)

“Yes, there have been some obstacles. Particularly with hiring non-office positions as we are a union contractor. Our approach has been **lobbying with the unions** to ensure EEPs are assigned to our jobs.” (Union-Affiliated Contractor)

“We only hire union electricians and work closely with our local to hire qualified electricians. Unfortunately, it has been very **difficult to find qualified, union electricians that also qualify as EEP’s.**” (Union-Affiliated Contractor)

“We have **never received any responses** to the emails sent to our local IBEW office in regards to what they are doing to recruit EEPs into their apprenticeship programs. This is the second year in a row in which no response was received to the request. Because our electrical workforce contains (3) IBEW subcontractors, this will be important in the future as the requirement percentages continue to grow.” (Union-Affiliated Contractor)

Positive Feedback about the MES

“On a final note, while it has been challenging to meet the MES as a small, mostly remote workforce, [REDACTED] **appreciates the resources shared by Illinois Shines**, including the Safe Harbor Eligibility approach.” (Illinois Shines Participating Entity)

“We have been very proactive in searching out EEPs to fill our open positions and **appreciate the steps the Program has taken to ensure opportunities for these individuals.**” (Illinois Shines Participating Entity)

“[REDACTED] **appreciates the IPA’s efforts to effectuate goals to increase access to employment opportunities** in the Illinois clean energy economy for those individuals who have historically been excluded from it.” (Illinois Shines Participating Entity)

“We deeply appreciate the intent of the MES and the **IPA’s continued commitment to building a more diverse clean energy workforce.** [REDACTED]’s affiliate, [REDACTED], has integrated MES compliance into teams across the company, leading to positive EEP hiring outcomes. It has been heartening to see how the MES has also led to job placement outcomes with our Engineering, Procurement, and Construction (EPC) partners, who are also our Installer Designees.” (Illinois Shines Participating Entity)

“Now that we are informed, we **recognize the value** these programs bring in developing a skilled, diverse clean energy workforce, particularly from underrepresented communities.” (Illinois Shines Participating Entity)

Identified Outreach Methods

Many MES Year-End Reports included a variety of outreach methods described in the Communication Plan section of the form. Some common themes in outreach are included below.

- Registering in the Energy Workforce Equity Portal
- Outreach to FEJA and CEJA training programs
- Working with the 548 Foundation
- Attending local job fairs and community events
- Posting open positions on IllinoisJobLink and IllinoisWorkNet
- Evaluating current employee EEP eligibility through the EIEC map

The **Energy Workforce Equity Portal** was mentioned in approximately 25 MES Year-End Reports.