



March 17, 2026

TO: Illinois Power Agency (IPA)

FR: Climate Jobs Illinois (CJI)

RE: IPA Request for Public Comments on the Illinois Shines Draft Program Guidebook

Please direct questions and comments to:

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### **About Us**

Climate Jobs Illinois is a coalition of labor organizations advocating for a pro-worker, pro-climate agenda in Illinois. Our mission is to advocate for a clean energy economy at the scale climate science demands, create good union jobs and support more equitable communities. Our coalition represents hundreds of thousands of Illinois working men and women who are the best trained and skilled to build Illinois' new clean-energy economy from the ground up. By focusing on the construction of clean energy sources as a way to combat the climate crisis, Climate Jobs Illinois offers a compelling new approach to creating an equitable and clean economy. Building a clean energy economy is an opportunity for labor to lead on climate by creating high-quality family-sustaining jobs that spur economic development while reducing carbon emissions.

Climate Jobs Illinois is a state affiliate of the Climate Jobs National Resource Center. Climate Jobs Illinois is directed by a coalition representing hundreds of thousands of union members across Illinois, and our Executive Committee is comprised of leadership from:

- Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Union Chicago & St. Louis
- Mid-American Carpenters Regional Council
- International Brotherhood of Electrical Workers Local 134
- International Brotherhood of Electrical Workers State Council
- Illinois Education Association
- Illinois Federation of Teachers
- International Union of Operating Engineers Local 150
- Midwest Region of Laborers International Union of North America
- Great Lakes Region Laborers International Union of North America
- Illinois Pipe Trade Association
- International Association of Heat and Frost Insulators and Allied Workers

## **Background**

The Illinois Power Agency (IPA) requested public feedback on the draft 2026-2027 Illinois Shines Program Guidebook. On behalf of our coalition members and their rank-and-file union members, Climate Jobs Illinois submits the following feedback pertaining to:

1. Increasing the community solar project cap from 5 MW to 10 MW (Section 1.E);
2. Requiring a Project Labor Agreement (PLA) for community solar projects over 3 MW (Section 4.R); and
3. Considerations for PLA submission and evaluation timeframes (Section 4.R).

Overall, we support IPA's proposed changes. We believe these changes will help the Illinois Shines Program adapt to the growing solar market while maintaining high-road labor standards and investing in Illinois' skilled workforce.

We are also pleased to see that the IPA has updated program guidance to reflect legislative changes in Illinois' Clean & Reliable Grid Affordability Act (CRGA), which not only supports Illinois' growing solar market, but also expands access to clean energy opportunities for equity eligible persons. By supporting workforce programs like the Climate Works Preapprenticeship Program, CRGA and CEJA create pathways into good-paying, union careers while building a skilled and diverse workforce to support Illinois Shines and other programs.

## **Section 1.E: Community Solar Project Size**

Climate Jobs Illinois (CJI) supports the proposed increase in the size limit for community solar projects from 5 MW to 10 MW. This is consistent with legislative changes under the Clean and

Reliable Grid Affordability Act (CRGA) and it is our understanding that raising the community solar project cap to 10 MW will allow for additional development in this sector.

Illinois' clean energy market has matured significantly since the Illinois Shines program was created under CEJA. Developers, utilities, and the workforce now have greater experience delivering projects efficiently at larger scales. Allowing larger community solar projects can improve economies of scale, expand subscriber access, and accelerate progress toward the state's clean energy goals. From a workforce perspective, larger projects can also provide more consistent construction schedules and allow contractors to efficiently deploy workers.

#### **Section 4.R: Community Solar Labor Standards**

CJI also supports the requirement that community solar projects larger than 3 MW operate under a Project Labor Agreement (PLA), as required by CRGA. Project Labor Agreements provide a proven framework for coordinating multiple trades, ensuring access to a skilled workforce, and maintaining consistent safety and labor standards on complex construction projects. Requiring a PLA for community solar projects at this scale will help ensure projects are built safely, efficiently, and on schedule, all while supporting high-quality jobs for Illinois workers.

CJI supports the IPA's effort to establish a clear timeline for PLA submission, and we agree that PLAs must be in place before construction begins. However, we encourage the IPA to require PLA submission earlier in the REC process to ensure sufficient time for PLA review and compliance verification. In the construction industry, PLAs are negotiated well in advance of construction. Requiring PLA submission closer to the REC contract execution stage should provide additional clarity for both developers and the IPA. It is also important to define the term "start of construction," to ensure clarity in project timelines and PLA submission.