



VIA ELECTRONIC MAIL

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Comments of Dimension Energy (Dimension) regarding the draft Illinois Shines guidebook for Program Years 2026-2027

Dimension thanks the Illinois Power Agency (IPA) for the opportunity to submit comments regarding the draft guidebook recently released for Program Years 2026-2027 of Illinois Shines. Dimension has been an active participant in the Illinois Shines program and has developed one of the largest community solar portfolios in Illinois by building a strong network of EEC partners and investing in complementary initiatives to CEJA-funded workforce development programs. To date, Dimension has submitted over 50 projects across the TCS and CDCS blocks, with 19 active REC contracts. We currently have 120 MWs awarded or waitlisted within Illinois Shines in partnership with EECs. Dimension has been a consistent advocate for expanding EEC opportunities, working with 10 EEC partners across a range of scopes - from REC contract management to full EPC scope. Dimension has also served as a Mentor in Illinois Shines' EEC mentorship program. We have also committed to investing over \$10M in local municipalities, CEJA Hubs, and nonprofits through our awarded CDCS portfolio and a newer campaign to help downstate communities tap into community solar benefits.

Given Dimension's active participation in the Illinois Shines program, we respectfully offer the following comments and suggested edits to the draft guidebook to ensure that this iteration of the program is nimble, effective, and aligned with the legislative intent of the Clean and Reliable Grid Act (Public Act 104-0458, also known as "CRGA").

EEC REC Adder – Adjust Scope of “Self-Performed” Work

CRGA directs the IPA to take steps to (1) encourage higher portions of REC value to be provided to EECs and (2) to support greater Illinois Shines program participation of equity eligible persons (EEPs) who exercise control and actively manage their businesses and their businesses' contractual projects. However, as currently drafted in Section 1.J. of the draft guidebook, the EEC REC Adder's definition of "self-performance" is too restrictive to allow for most EECs to participate and continue to build their businesses in the Illinois Shines program.

The current definition calls for the EEC REC adder to apply only to those projects where an EEC performs all the engineering, procurement, and construction (EPC) or development work. While Dimension recognizes and applauds the IPA's long-term goals for generational wealth-building opportunities through the EEC REC Adder, the current definition would have the unintended consequences of leaving most EECs out of the pool of contractors eligible for this REC adder. Today, the majority of registered EECs are sole proprietor small businesses and do not yet have the training, financing, insurance, or bonding to serve as the full EPC. Dimension is grateful to have executed EPCA contracts with two EEC EPCs but notes that it would be challenging to find other EEC EPCs who have



the necessary experience and who could meet the bonding requirements set by our lenders. We encourage the IPA to adjust the definition of “self-performance” to allow for work on *some* specific project scopes, rather than on all, while more EECs gain experience and access to bonding and financing in the coming years through CEJA-funded programming such as the Contractor Incubator Program. With this same goal in mind, we encourage the IPA to outline what exactly qualifies as “development work” within the definition of “self-performance” and to ensure that those development scopes are accessible by the majority of EECs. These adjustments will more meaningfully align with CRGA’s goal of greater EEC and EEP participation in project development and construction.

Designee Requirements for Non-Profit Community-Based Organizations

As one of the largest developers of Community-Driven Community Solar (CDCS) projects in Illinois, Dimension is committed to maximizing the local benefits of our projects. One way we do this successfully in other markets is to partner with local community-based organizations (CBOs), rather than for-profit subscriber aggregators, in order to subscribe low- and middle-income (LMI) customers. By working with CBOs, we can reach more residents from a place of trust, while building those CBOs’ capacity to provide a new client service and creating a new, sustainable revenue stream for them. Our first 30 MW of approved CDCS projects include local LMI subscriber commitments, but our progress towards meeting those commitments through CBOs has been stymied by well-intentioned program rules.

Section 2.I of the program guidebook as currently written requires that all organizations working to enroll subscribers directly must register as designees. Pursuant to 20 ILC 3855/1-75, designee status is contingent upon compliance with the minimum equity standard (MES). While Dimension is supportive of the letter and spirit of the MES its related reporting requirements are burdensome for the resource-strapped local non-profits that would be well-positioned to enroll LMI subscribers. We have not yet been able to encourage a local CBO to register as a designee. The unintended consequences of this requirement are clear; subscriber acquisition dollars are flowing predominantly to for-profit entities who are able to manage the MES reporting and compliance requirements. To date, all registered subscriber designees in the Illinois Shines program are either municipalities or for-profit entities, many of which are domiciled out of state.

To more effectively achieve CEJA and CRGA’s goals of maximizing local community solar benefits, Dimension recommends adjusting the guidebook requirements to exempt non-profit CBOs from the designee registration requirement *when partnering with AVs on LMI subscription campaigns*. Alternatively, the program guidebook could maintain the designee registration requirements for CBOs, but exempt non-profit CBOs from the MES requirements *when partnering with AVs on LMI subscription campaigns*. Dimension recognizes that a balance must be struck between providing non-profits with a sustainable path to participation in the clean energy economy while also maintaining programmatic guardrails against potential bad actors and look forward to working with the IPA to find a solution to this unintended consequence of the MES and designee system.

Reduce Timeline for Submission and Evaluation of Project Labor Agreements (PLAs)

Section 4.R of the program guidebook requires that projects selected in the 2026-2027 delivery year provide their PLA to the IPA 60 days prior to construction. While Dimension does our best to have our EPCs and associated PLAs in place well ahead of the start of construction, as a developer we sometimes run into expedited timelines. We therefore feel that 30 days is a more appropriate requirement than the 60-day timeline currently laid out in the program guidebook.

Conclusion

Please don't hesitate to be in touch if Dimension can provide additional details regarding our experience with the program or the recommended edits outlined above. We appreciate this opportunity to provide comments and look forward to working with IPA staff to continue the success of Illinois Shines.

Sincerely,
/S/ Brandon Smithwood

Vice President of Policy
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