

From: [REDACTED]
To: IPA.Solar
Subject: [External] Re: Draft Program Guidebook Released for Stakeholder Feedback – Comments Due March 20, 2026
Date: Saturday, March 21, 2026 11:33:49 AM
Attachments: [600w_IL-Shines-Email-Header.png](#)

Hello,

I'm sorry for sending this one day after your deadline. Below are my comments on the Draft 2026-2027 Illinois Shines Program Guidebook published on March 9, 2026. My comments are intended to improve clarity, not to offer any policy judgments. As usual, I'm writing in my own individual capacity, on behalf of no entity, and I haven't discussed or shared this with anyone.

Page 48: this is part of Section 2.J about Small and Emerging Businesses. I think this sentence:

An Approved Vendor's status as an "emerging business" will expire at the end of the third full Program Year the business has been authorized to do business in any U.S. state, district or territory for three years.

needs clarification. (I checked against 2026 LTRRPP, section 7.10.1.1 for background on this issue.) I suggest editing as follows:

An Approved Vendor's status as an "emerging business" will expire at the end of the third full Program Year **after** the business has been authorized to do business in any U.S. state, district or territory **for three years**.

Page 67: this is part of Section 4.F. Under the heading "Co-location with Projects Not Participating in Illinois Shines" it describes a certain policy change (flowing, I gather, from Public Act 104-0458 at pages 246-248, and not yet reflected in the 2026 LTRRPP, and maybe intended to be proposed later to the ICC as described in the IPA's Brief on Exceptions in ICC Docket 25-0945) as follows:

As of June 1, 2026, this is no longer permitted.

The language should clarify whether this means new Illinois Shines Part I project applications as of June 1st, or new REC Contract approvals as of June 1st, or something else.

Page 70: In footnote 45, a portion of the formula is wrong. Instead of

[AC System Size (kW) / 8760 (h/yr)]

it should say

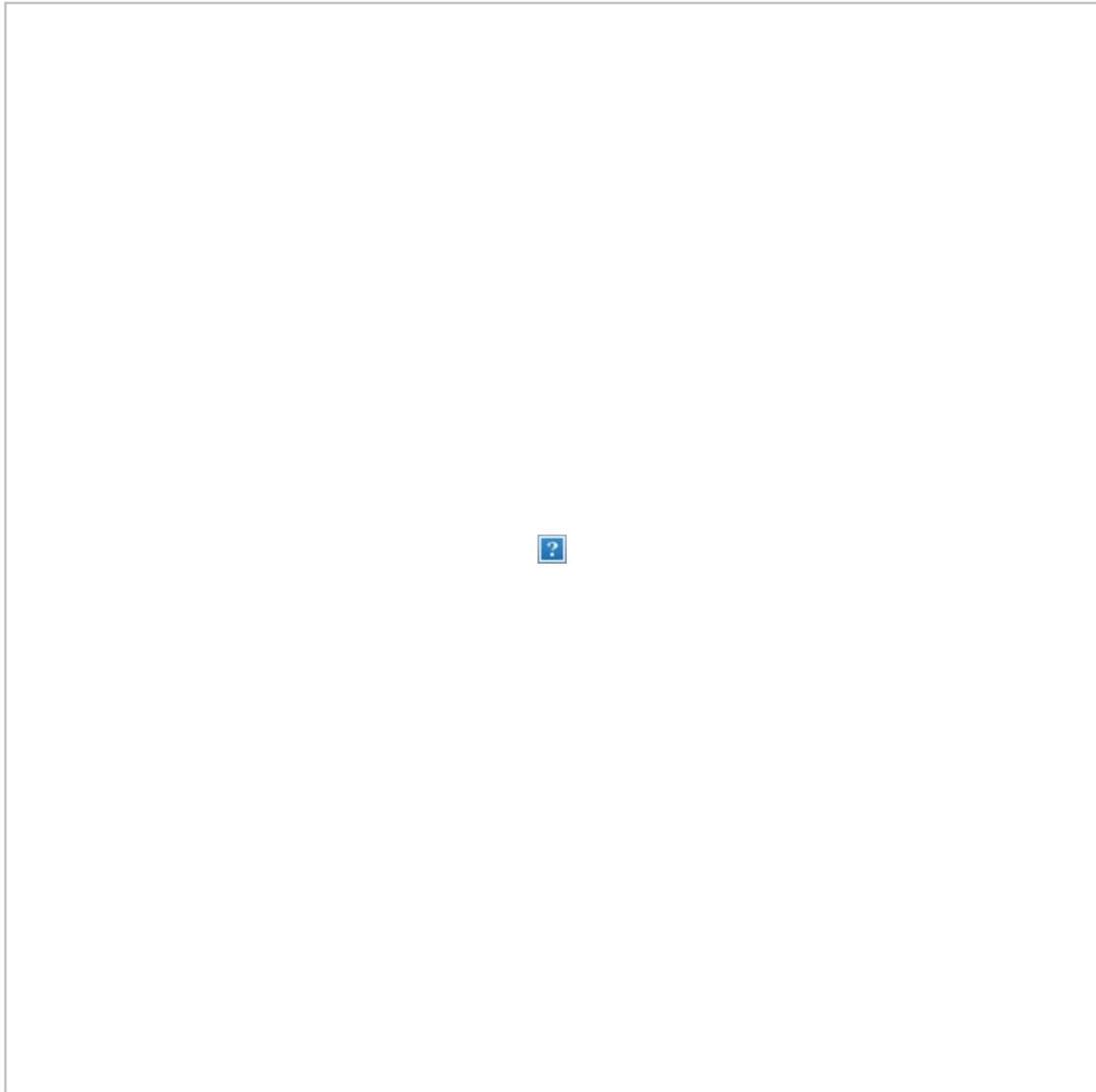
[AC System Size (kW) * 8760 (h/yr)]

Thanks for your consideration,

Sameer Doshi



On Monday, March 9, 2026 at 09:32:58 AM CDT, Illinois Shines Program Administrator <admin@illinoisabp.com> wrote:



**Draft Program Guidebook Released for Stakeholder Feedback –
Comments Due March 20, 2026**

March 9, 2026

The Agency has released a [draft of the 2026-27 Program Year Illinois Shines Program Guidebook](#). This draft Guidebook will undergo stakeholder feedback; the Agency will review comments

submitted and then release a final version of the Guidebook for the 2026-27 Program Year, which commences on June 1, 2026.

The Agency will release the final Program Guidebook for the 2026-27 Program Year on April 15, 2026, 45 days in advance of the start of the Program Year, to allow Program participants time to review, understand, and prepare to be in compliance with all changes in the Program Guidebook when the 2026-27 Program Year commences on June 1, 2026.

High-Level Changes to Draft Guidebook

- Increase in size limit for community solar projects from 5 MW to 10 MW AC in Section 1.E
- REC Adder for all EEC category Distributed Generation applications in Section 1.J
- REC Adder for EEC category Community Solar applications for “self-performing” Approved Vendors in Section 1.J
- REC Adder for Small Distributed Generation customer-owned applications in Section 1.J
- Small and Emerging Business designation for Approved Vendors in Section 2.J
- Project Labor Agreement requirement for Community Solar applications over 3 MW AC in size in Section 4.R
- Updated Part I and Part II application requirements in Section 5
- Opt-in batching for community solar projects in Section 5.A
- Relief for Abandoned Contracts in Section 6.E.
- New combined MES Compliance Plan and Year-End Report in Section 7.J.
- Minimum Equity Standard (MES) requirements for Equity Eligible Contractors in Section 7.J
- Updated Traditional Community Solar in Appendix E and Community-Driven Community Solar Scoring Criteria in Appendix F

The Agency would like to highlight sections where feedback is particularly requested:

1. In Section 1.J, the Agency is seeking feedback on the definition of “*self-performance*” and the proposed required evidence at Part I submission for the eligibility of the \$5/REC Adder for projects participating in the Community Solar subcategory of the Equity Eligible Contractor category where the EEC Approved Vendor “self-performs” all the engineering, procurement and construction (“EPC”) or development work.
2. In Section 4.R, the Agency is seeking feedback on the timing for the submission and evaluation of Project Labor Agreements (PLA) required for community solar projects (including co-located projects with an aggregate nameplate capacity over 3 MW) approved by the ICC for a REC Contract on or after June 1, 2026. The Agency’s

proposal is for Approved Vendors to submit the PLA to the Program Administrator at least 60 days prior to the commencement of construction of the project.

3. In Section 5, the Agency is seeking feedback on two key changes to consumer protections:

a. In Section 5.F, the Agency is proposing a new requirement that Part I applicants upload the AV-customer REC contract for DG, customer-owned projects. One purpose of this requirement is to give the Program Administrator ready access to the AV-customer REC contract in case of a dispute regarding a provision of the contract (for example, a promised pass-through payment), particularly in cases where the AV has since gone out of business or is otherwise unable to provide a copy of the contract. In addition, if an AV is placed into the escrow process, access to the contracts will assist the Program Administrator in determining pass-through amounts owed to customers.

a. The Agency is also proposing a new requirement that Part I applicants upload the project installation contract, lease, or Power Purchase Agreement. This requirement will allow the Program Administrator to more efficiently conduct routine audits of compliance with contract requirements and will give the Program greater transparency into market trends.

The Agency is seeking feedback on whether these proposed requirements would present an undue burden to project applicants and, if so, whether there is a less burdensome proposal that still meets the above consumer protection goals.

1. In Section 6.E, the Agency proposes Approved Vendors submit proof of “reasonable effort” taken to contact its customers to receive relief for instances where a customer has “abandoned” their contract with the Approved Vendor. The Agency is seeking feedback on whether the definition of “reasonable effort” suffices for the purposes of the AV providing evidence, which as proposed entails efforts to contact a customer made at least once every two months, with at least six attempts in a calendar year using alternating methods (phone calls, emails, and mailed letters), unless the customer responds prior to the sixth attempt confirming the Contract has been abandoned.

Next Steps in Program Guidebook Comment & Update Process

- Comments on draft Program Guidebook are due March 20, 2026. The IPA is providing the following materials:
 - [Draft 2026-27 Program Guidebook](#)
 - [Redline comparison between the current 2025-26 Program Guidebook and the draft 2026-27 Program Guidebook](#)
- Stakeholders should email comments to IPA.Solar@illinois.gov by March 20, 2026, with the subject line “2026-27 Illinois Shines Program Guidebook Feedback.”
- The Agency will review comments and make any relevant edits.
- The Agency will release final Program Guidebook for the 2026-27 Program Year on

April 17, 2026

- The 2026-27 Program Guidebook takes effect June 1, 2026.

Stakeholders can find the draft Program Guidebook on the [Program Documents](#) page of the website. Please note that responses provided via this feedback request will be made public and published on the [Program's website](#). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both public and redacted versions of their comments.

PLEASE NOTE – Changes to the Program requirements via edits to the Program Guidebook, Consumer Protection documents, as published on April 17, 2026, will not take effect until June 1, 2026. Beginning June 1, 2026, all Program participants are expected to be in compliance with the updated Program requirements or may face disciplinary action.

Thank you!

Illinois Shines Program

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