



COMMENTS ON THE 2026-2027 DRAFT PROGRAM GUIDEBOOK ON BEHALF OF SOLAR LANDSCAPE

March 20, 2026

As the nation’s leading developer of commercial and industrial rooftop community solar, Solar Landscape appreciates the Illinois Power Agency’s (“IPA”) opportunity to comment on the 2026–2027 Draft Program Guidebook. These comments draw from our experience participating in Illinois Shines—particularly with Community-Driven Community Solar (“CDCS”) projects—and our mission to expand equitable access to clean energy across Illinois.

1. Compliance and Consumer Protection

Solar Landscape is concerned that the newly added preamble language in Section 3: Compliance and Consumer Protection introduces a disciplinary standard that is overly punitive and inconsistent with the existing Consumer Protection Guidebook framework.

The Draft Guidebook states that Approved Vendors must actively supervise their Designees and any individual or entity acting on their behalf and further provides that discipline for noncompliance “may include suspension of eligibility to receive or otherwise benefit from Program-administered delivery contracts.” While Solar Landscape understands and supports the IPA’s intent to ensure strong oversight and consumer protections, this specific disciplinary provision represents a significant departure from the established Consumer Protection Violation Matrix, existing Designee Management Plans, and the Consumer Protection Guidebook.

Under the current Consumer Protection Guidebook, enforcement actions are structured, proportional, and tied to specific violations. By contrast, the introduction of potential suspension from program participation in the Program Guidebook as a consequence of actions taken by Designees or Nested Designees—regardless of the Approved Vendor’s level of involvement—creates a disproportionate and unbounded risk for Approved Vendors.

Although Approved Vendors are responsible for actively supervising their Designees and Nested Designees, they may not have full visibility into or control over all activities undertaken by these entities at all times. This is particularly true for Nested Designees, which may operate with additional layers of separation. The program's requirement that Designees and Nested Designees register directly with the IPA reflects an existing framework in which the Agency maintains oversight and accountability over these actors in terms of discipline.

As drafted, this language exposes Approved Vendors to the risk that the actions of a Designee or Nested Designee could trigger severe disciplinary consequences—potentially impacting an entire portfolio of projects, including those that are already operational or under contract—even where the Approved Vendor had no direct involvement in, or knowledge of, the underlying conduct.

This risk is further compounded by the fact that Designees/Nested Designees may operate on behalf of multiple Approved Vendors, including competitors. In such cases, an Approved Vendor could face significant programmatic consequences based on conduct that occurs outside of its control or visibility, even with robust compliance programs that are implemented to monitor compliance and mitigate potential violations.

For these reasons, Solar Landscape believes that the inclusion of this disciplinary language is not aligned with the established Consumer Protection framework and introduces unnecessary and disproportionate risk. We respectfully recommend that the provision allowing for suspension of eligibility to receive or benefit from Program-administered delivery contracts be removed from the Program Guidebook.

2. Development Timelines

Solar Landscape appreciates the IPA's decision to extend the development timeline for community solar projects to 36 months. This change appears to recognize the practical realities of project development, as well as the frequency with which developers have needed to request extensions under the current 24-month timeframe.

We respectfully request clarification on how this updated timeline will be applied. Specifically, it is unclear whether the 36-month development period will apply to projects that are already under contract or only to projects submitted after June 1, 2026. Additional guidance on this point would help provide certainty to developers currently managing project pipelines.

3. Part I – Co-location Notary Requirement

The Draft Guidebook introduces a new requirement for a notarized affidavit attesting that the parcel on which a project is sited has not been subdivided within the preceding five years and that the project is not affiliated with other community solar projects in a way that would cause co-located systems to exceed the 10 MW nameplate capacity limit.

Solar Landscape recommends removing this requirement for rooftop community solar projects, particularly within the CDCS category. Rooftop systems are highly unlikely to present the same co-location risks as ground-mounted projects and, rooftop projects sited on adjacent parcels are not considered collocated under program rules. As a result, this requirement is not well-aligned with the realities of rooftop development or current program rules and imposes unnecessary administrative burden.

Additionally, the requirement for notarization introduces avoidable delays and friction in the application process. If the IPA determines that some form of certification is necessary, we encourage the Agency to consider alternative approaches that do not require notarization and are more streamlined for applicants.

4. Changes to Disclosure Form Requirements

Solar Landscape appreciates the Commission's efforts to provide greater flexibility for rightsizing customer subscriptions. This change reflects a practical understanding of how customer usage and subscription levels may evolve over time.

However, many existing subscribers have already executed disclosure forms that do not include these updated provisions. Requiring these customers to execute entirely new disclosure forms in order to take advantage of the revised rightsizing flexibility would create significant administrative burden and may lead to unnecessary customer churn.

Instead, Solar Landscape recommends that existing subscribers be notified of the updated rightsizing provisions and allowed to opt in through a simplified acknowledgment or addendum process. This approach would preserve consumer protections while minimizing disruption to existing customer relationships and avoiding unnecessary barriers to participation.

Conclusion

Solar Landscape appreciates the IPA's continued efforts to refine and strengthen the Illinois Shines program and expand access to equitable clean energy across the state. The updates proposed in the Draft Program Guidebook reflect a thoughtful approach to addressing evolving market conditions and program needs.

At the same time, several of the proposed changes would benefit from clarification or revision to ensure they are practical to implement, aligned with existing program frameworks, and do not introduce unintended risk or administrative burden. In particular, maintaining consistency with established consumer protection standards, ensuring reasonable compliance expectations, and minimizing unnecessary barriers to participation will be critical to sustaining a healthy and competitive program.

Solar Landscape looks forward to continued collaboration with the IPA and other stakeholders to ensure the long-term success of Illinois Shines and the continued growth of community solar in Illinois.