

# Minimum Equity Standard (MES) Compliance

Program Year 2026-27 MES Compliance Season

Presented by Illinois Power Agency and Energy Solutions

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# Presenters



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# AI Notetaking Prohibition



In considering privacy, intellectual property, and accuracy concerns, and to encourage active and candid participation, the Agency has determined that the use of Artificial Intelligence (AI) notetaking tools will not be permitted in this meeting.

The Agency and/or its Program Administrator will remove AI notetakers from the meeting. Thank you for your understanding and cooperation.



# Agenda

- 1** Recap of MES Requirements, Definitions, and Deadlines
- 2** Introducing the New *MES Combined Compliance and Year-End Report*
- 3** EEC MES Requirements
- 4** MES Combined Report – Year-End Report Section
- 5** Process for Verifying EEPs
- 6** MES Year-End Report Evaluation Process
- 7** MES Waiver Request Process
- 8** Small Business Safe Harbor
- 9** MES Combined Report – Compliance Plan Section
- 10** Consequences of Non-Compliance





# Recap of MES Requirements, Definitions, and Deadlines

# CEJA DEI Goals & the Equity Accountability System

The Illinois Power Agency (IPA) Act, amended by the Climate and Equitable Jobs Act (Public Act 102-0662) and the Clean and Reliable Grid Affordability Act (CRGA), expands the "priority access to the clean energy economy for businesses and workers from communities that have been excluded from economic opportunities in the energy sector, have been subject to disproportionate levels of pollution, and have disproportionately experienced negative public health outcomes."

To advance that objective, the Act directed the Agency to establish an Equity Accountability System (EAS), which includes the following:

- Minimum Equity Standard ("MES") applicable to all applicants to the Agency's renewable energy procurements
- Establishes the Equity Eligible Contractor category within Illinois Shines

# CEJA DEI Goals & the Equity Accountability System

Beginning in Program Year 2023-24, the project workforce of each participating Approved Vendor and Designee must meet a required minimum percentage that includes Equity Eligible Persons (EEPs), with this required percentage increasing to 30% by 2030.

The Minimum Equity Standard (MES) is applicable to all applicants to the Agency's Illinois Shines program.

- For Program Year 2025-26, which started June 1, 2025, at least 14% of project workforce for each entity that participates in Illinois Shines that year must be comprised of Equity Eligible Persons (EEPs).
- For Program Year 2026-27, the required MES % is also 14%.
- By 2030, at least 30% of the project workforce for each entity participating must be comprised of EEPs.

Program Year	Scheduled MES %	% Increased
2024-25	10%	-
2025-26	14%	4%
2026-27	14%	-
2027-28	18%	4%
2028-29	22%	4%
2029-30	26%	4%
2030-31	30%	4%

# Who are Equity Eligible Persons and Contractors?

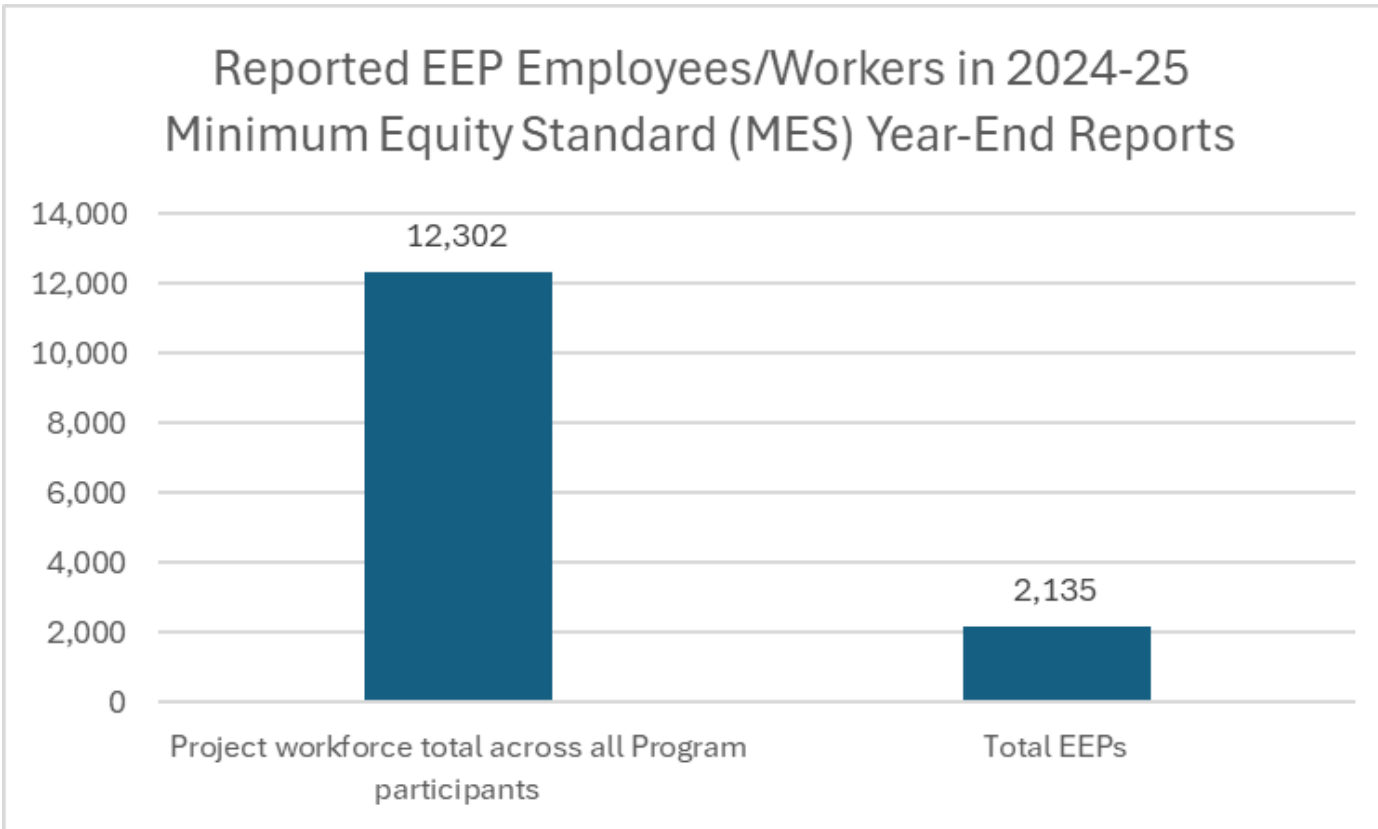
The IPA Act defines EEPs as:

- 1 Graduates or current or former participants in the Clean Jobs Workforce Network Program, Clean Energy Contractor Incubator Program, Illinois Climate Works Preapprentice Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multicultural jobs program created by the Climate and Equitable Jobs Act (FEJA)
- 2 Persons who are graduates of or currently enrolled in the foster care system
- 3 Persons who were formerly incarcerated
- 4 Persons whose primary residence is in an equity investment eligible community

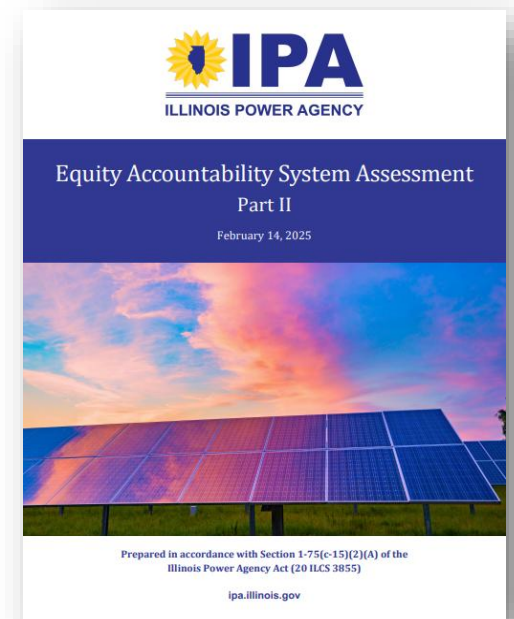
**EEC:** A business that is majority-owned by equity eligible persons, or a nonprofit or cooperative that is majority-governed by equity eligible persons, or is a natural person that is an eligible person offering personal services as an independent contractor.



# Effectiveness of MES



For more information on MES implementation and its effectiveness, please refer to IPA's Equity Accountability System Assessment Part II, published on February 14th, 2025.



# Who is included in an Illinois-based Illinois Shines Project Workforce?



Employees, contractors and their employees, and subcontractors and their employees.



Job duties are directly required by or substantially related to the development, construction, and operation of a project that is participating in or intended to participate.



Including workforce in administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois.



# Introducing the New *MES* Combined Compliance and Year-End Report

# MES Combined Report Intro and Overview

We are excited to announce that in response to stakeholder feedback, MES reporting will be consolidated into one report due on July 15. The new *MES Combined Compliance and Year-End Report* allows participants to submit their 2026-27 MES Compliance Plan and 2025-26 MES Year-End Report simultaneously.

The Combined Report has two sections:

- The *MES Year-End Report* looks backward and captures how your organization achieved the MES requirement for the 2025-26 Program Year
- The *MES Compliance Plan* is forward-looking and captures how your organization intends to achieve compliance with the MES requirement in the upcoming 2026-27 Program Year.

For Program Years 2025-26 and 2026-27, the MES requirement is the same: at least 14% of the project workforce for each entity participating in Illinois Shines must be composed of EEPs.



# Efficiencies and User Experience Benefits

- The *MES Combined Compliance and Year-End Report* allows for:
  - A single deadline for MES reporting on July 15th, 2026
  - Document uploads within the submission form
  - Automated calculations that show whether your organization is meeting the MES requirement



# Timeline and Deadlines



# Combined MES Report Submission Process



The *MES Combined Compliance and Year-End Report* will be submitted via PowerPages. Program participants will receive a link and access information via email, which will take them to their secure submission portal.



The submission window for *MES Combined Compliance and Year-End Reports* will open by June 1, 2026; all Reports are due by July 15, 2026



Please send any questions about your submission or the submission format to: [MES@IllinoisShines.com](mailto:MES@IllinoisShines.com)



A template of questions in the *MES Combined Compliance and Year-End Report* can be found in the Draft Program Guidebook in Appendix Q.

- Original submission  
- Revised Compliance Plan

Submitting Company Name:  
AV and/or Designee ID #(s):  
If you are submitting a new Approved Vendor application or Designee registration that has not been

Appendix Q – Program Year 2025-26 Minimum Equity Standards (MES) Compliance Plan for the Illinois Shines Program

PLEASE NOTE – THIS TEMPLATE IS NOT TO BE USED TO SUBMIT A COMPLIANCE PLAN. THE PROGRAM ADMINISTRATOR WILL RELEASE A DIGITAL FORM FOR SUBMISSIONS. THIS TEMPLATE IS SIMPLY TO PROVIDE TRANSPARENCY ON THE INFORMATION THAT WILL BE COLLECTED THROUGH THE FUTURE-RELEASED FORM.

Program Year 2025-26 Minimum Equity Standards (MES) Compliance Plan for the Illinois Shines Program

Background

The Climate and Equitable Jobs Act (Public Act 102-0662 or "CEJA") amended the Illinois Power Agency Act to expand the "priority access to the clean energy economy for businesses and workers from communities that have been excluded from economic opportunities in the energy sector, have been subject to disproportionate levels of pollution, and have disproportionately experienced negative public health outcomes."

CEJA directed the Illinois Power Agency ("IPA" or "Agency") to help historically underserved communities participate in and benefit from the growing clean energy economy in Illinois. The Minimum Equity Standard Compliance Plan is the reporting mechanism the Program Administrator uses to assess understanding of compliance requirements and estimated project workforce demographics.

For Program Year 2025-26, at least 14% of the project workforce for each entity participating in the Illinois Shines Program must be composed of Equity Eligible Persons (EEPs). With the exception of Equity Eligible Contractors (EECs), all Approved Vendors (AVs) and Designees participating in the 2025-26 Program Year are required to submit an MES Compliance Plan, describing how the requirement will be met over the course of the year.

The Equity Accountability System Hub provides helpful resources and tips for MES Compliance Plan submissions: <https://illinoisshines.com/equity-accountability-system>.

As you review the form below in preparation for submitting your MES Compliance Plan, please note that asterisks indicate required sections. Once submitted, MES Compliance Plans will become public records that may be subject to disclosure under the Illinois Freedom of Information Act (5 ILCS 140); as such, if any information within this MES Compliance Plan should be protected from disclosure, please indicate in question #XX of this form what information, if any, in this form is proprietary, privileged, or confidential, and the disclosure of that information would cause competitive harm.

Is your company an Approved Vendor, Designee or both?

- Approved Vendor  
- Designee  
- Both

Appendix V - Certification of Qualification for Equity Eligible Person Status Page 234 of 259



# EEC MES Requirements

# EEC MES Requirement

- As described in the 2026-27 Program Guidebook, beginning June 1, 2026, all EEC Approved Vendors and Designees will be required to meet the MES.
- This requirement for EECs begins in the upcoming 2026-27 Program Year
- This requirement does not apply to EEC subcontractors



# EEC MES Combined Report Overview

During the upcoming reporting window, the Program is requesting data from EECs on their projected 2026-27 project workforce. For the current 2025-26 Program Year, EECs are not required to comply with the MES requirement.

The *EEC MES Combined Report* has two sections:

- The **EEC Year-End Report** looks backward, capturing details on an organization's project workforce for the year. EECs do not need to show compliance with the MES for the 2025-26 Program Year.
- The **MES Compliance Plan** is forward-looking and captures how your organization intends to achieve compliance with the MES requirement in the upcoming **2026-27 Program Year**.

For Program Year 2026-27, the MES requirement is at least 14% of the project workforce for each entity participating in Illinois Shines must be composed of EEPs.



# EEC MES Combined Report Overview

In *future MES Combined Compliance and Year-End Reports*, EECs will be required to document their organization's compliance with the MES for the Program Year, including documentation on outreach efforts to recruit EEPs and the number of EEPs in its Illinois-based project workforce.

The MES Report due from EECs in July 2027 will be the same one required of all other non-EEC AVs and Designees.





# MES Combined Report – Year-End Report Section

# Year-End Report Overview

The MES Year-End Report is intended for participating organizations to document compliance with the MES. Required data and information include:

- AV/Designee Information
- Project workforce total
- Project workforce demographic information
- EEP workforce totals, including proof of EEP eligibility and any supporting documentation for EEPs not registered in the IPA's Energy Workforce Equity Portal
- Outreach efforts employed to recruit EEPs
- Job training program graduate hiring data, Illinois-based workforce diversity data
- ZIP codes for all project workforce

Achieving compliance with the MES for Program Year 2025-26 means that at least 14% of an AV's or Designee's Illinois-based project workforce is comprised of EEPs.



# How is "Program participation" Defined?

For the purposes of the MES, "participation" in the Program includes:



Submitting projects to Illinois Shines

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Performing construction on any project intended on being submitted to Illinois Shines

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Conducting any sales or marketing activity for projects that have been or will be submitted to the Program

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Maintaining subscriptions for a Community Solar project that holds a Renewable Energy Credit (REC) contract (including projects approved prior to the passage of CEJA)

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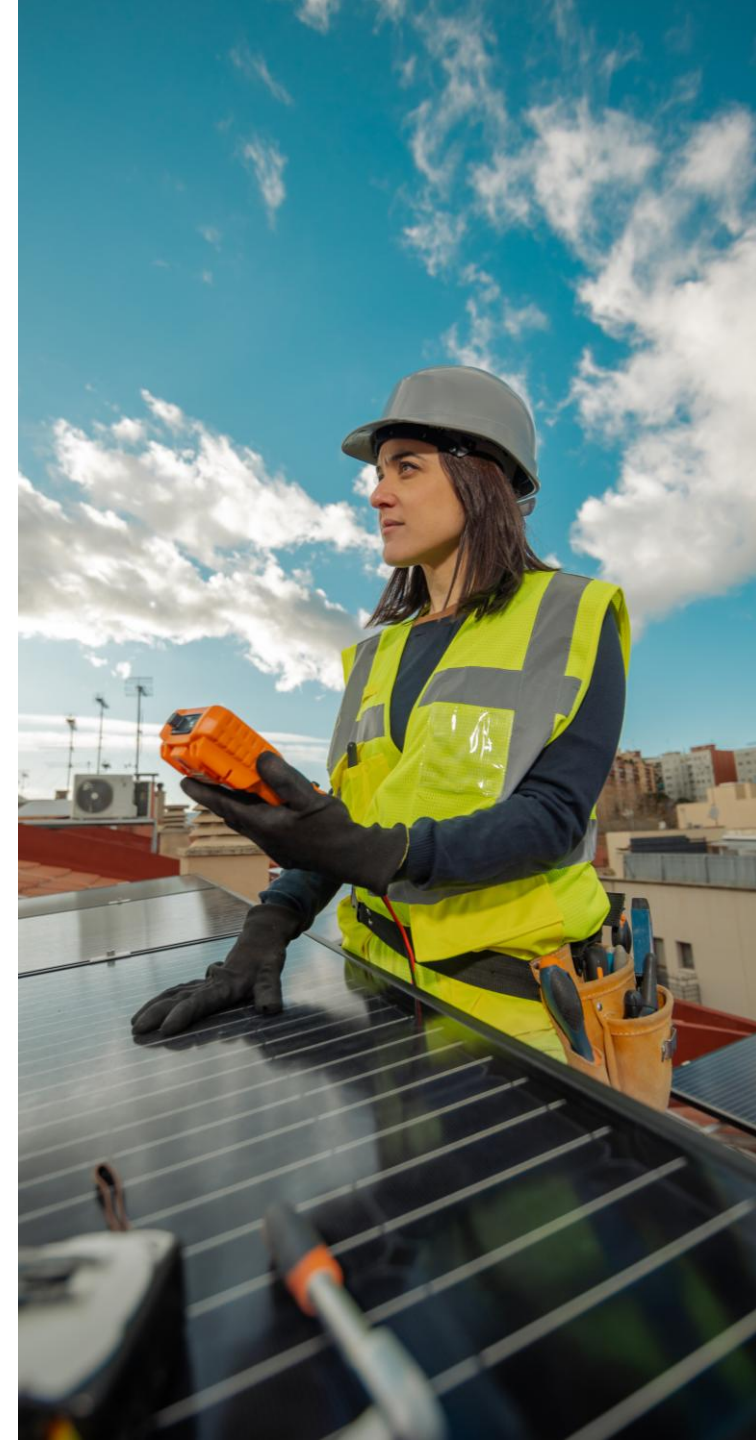


Maintaining a project on a waitlist

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Otherwise conducting business on a project seeking or that holds a REC contract



# Who should be included in my organization's total project workforce?

For the purposes of the MES, the IPA defines “project workforce” as the following:

Employees, contractors and their employees, and subcontractors and their employees, whose job duties are directly required by or substantially related to the development, construction, and operation of a project that is participating in or intended to participate in the IPA-administered programs and procurements under Section 1-75(c) of the IPA Act. This shall include both project installation workforce and workforce in administrative, sales, marketing, and technical roles where those workers' duties are performed in Illinois.

For purposes of this definition, ‘directly required by or substantially related to’ shall be construed to be any direct employee of the Approved Vendor, Designee, or Indexed REC contract holder, or any contractor and its employees whose contract exceeds 5% of the REC Contract value. Employees of contractors below that threshold may be counted toward the MES on a voluntary basis, but then all contractors below the 5% of REC contract value threshold must be included.

# Who should be included in my organization's total project workforce?

## Make sure to include in your project workforce calculations:

- Anyone from your company's payroll who contributed to an Illinois Shines project
- Employees of any non-registered subcontractors who worked on Illinois Shines projects
- Temporary or part-time workers
- Pre-construction work
- Administrative work related to Illinois Shines projects

## DO NOT include:

- The workforce of your Designees
  - All registered Program participants are required to submit MES reporting
- Employees who **do not** perform work duties in Illinois
  - Remote employees who perform their work duties fully remotely
- Employees of any subcontractors whose contract is less than 5% of the REC Contract value for a project
  - These can be included on a voluntary basis, but then all contractors below the 5% of REC contract value threshold must be included





# Process for Verifying EEPs

# The MES Year-End Report requires participating AVs/Designees to verify their EEPs

In the Report, you will be required to provide the full names of individuals in your project workforce who qualify as EEPs

- This can be done by either:
  - Having all EEPs register in IPA's Energy Workforce Equity Portal
  - Collecting signed EEP attestations and providing documentation for those individuals' EEP qualifications to submit to the Program Administrator with the Year-End Report

The Program Administrator will verify EEP qualifications as part of the review process



# EEP Verification in the MES Year-End Report

**EEP Name \***

**EEP Registered in Equity Portal \***

**Qualification Criteria \***

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**EEP Name \***

**EEP Registered in Equity Portal \***

**If the EEP is not registered in the Equity Portal, please upload the document(s) described below. \***

 No file chosen

**Qualification Criteria \***

# Energy Workforce Equity Portal

CEJA directed IPA and the Illinois Department of Commerce and Economic Opportunity (“DCEO”) to help historically underserved communities participate in and benefit from the growing clean energy economy. On January 31, 2023, IPA announced Phase I launch of the Energy Workforce Equity Portal.

## Job seekers can use the portal to:

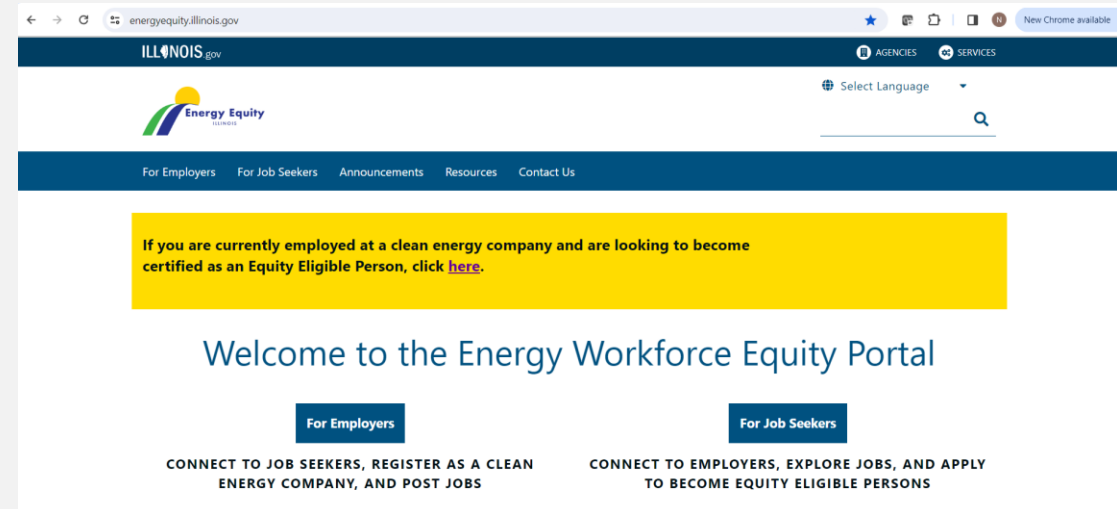
- See if they qualify as an EEP
- Register as an EEP
- View clean energy job postings for EEPs

## Clean Energy Project Developers can:

- Advertise clean energy jobs
- Search for EEPs seeking employment


While it is not a requirement to have EEPs registered in the Energy Workforce Equity Portal, this might provide an easier route to compliance with the MES.

After registering in the Energy Workforce Equity Portal and providing any necessary documentation, an EEP will receive an email from the IPA confirming their status within 5 business days



ENERGYEQUITY.ILLINOIS.GOV

# Energy Workforce Equity Portal (cont.)



## Equity Eligible Persons

Job seekers and individuals who are employed at a clean energy company can qualify as an Equity Eligible Person (EEP) in four different ways\*. Please fill out the information below to complete your application to be considered an Equity Eligible Person.

Contact Info

**First Name \***

**Middle Initial**

**Last Name \***

**Telephone \***

**Email Address \***

**City \***

**Basis for Equity Eligible Person Status \***

[Click here for Map of Equity Investment Eligible Communities.](#)

- Primary residence is in an Equity Investment Eligible Community (EIEC)\*
- Formerly Incarcerated
- Graduate or enrolled in Foster Care System
- Graduate, current or former participant in eligible job training/workforce development program

**Are you NABCEP Certified? \***

The North American Board of Certified Energy Practitioners offers a variety of certifications for renewable energy professionals. For more information see: [Web Site](#)

Yes  No

**Are you a Qualified Person? \***

The standard to be considered a Qualified Person is contained in the Illinois Commerce Commission's Part 468 Rules for Distributed Generation Installer Certification.

See: [Web Site](#).

Yes  No

**Are you a member of a union? \***

Yes  No

**Personal Info**

This information will be kept confidential by the Agency but may be published on an aggregated basis.

**Race/Ethnicity \***

**Gender \***

**Attachments**

**File Upload**

Please attach the following documents:

1. Upload Proof of your EEP Status
2. Resume (If seeking employment as an EEP)

browse files"/>

**Final Attestation that information provided is true and complete \***

**Do you want your information shared at this time? If 'Yes', your information will be shared with employers that use the Portal to recruit equity eligible job seekers. \***

If you would not like to have your information displayed to potential employers, please select "No"

# Year-End Report Process - EEP Attestation and Supplemental Documentation

If your organization's EEPs are NOT registered in the Energy Workforce Equity Portal, your organization will be required to collect signed EEP attestations and to provide documentation for those individuals' EEP qualifications to submit to the Program Administrator via the Year-End Report submission form.

**The EEP Attestation Form can be found here:**

<https://illinoisshines.com/minimum-equity-standard/>

Supplemental documentation is required for EEPs who qualify based on graduation from a participating workforce training program, or whose primary residence is located in an Equity Investment Eligible Community.

## Acceptable documentation:

For EEPs who qualify based on graduation or current participation in a qualifying workforce training program, please provide either an acceptance letter from the training provider (for current participants), or a certificate of completion from the training provider (for graduates).

For EEPs who qualify based on primary residence, please provide the individual's driver's license or state ID, utility bill, pay stub, mortgage agreement, or lease for the Program Administrator to verify the individual's eligibility.



# MES Year-End Report Evaluation Process

# Program Year 2025-26 MES Year-End Report Assessment

**Year-End Reports will be reviewed and assigned one of the following status determinations:**

## **1. Compliant**

The entity has met the applicable MES requirement for their Illinois Shines project workforce.

## **2. Non-Compliant**

The entity has either not met the 14% MES requirement within their project workforce, did not submit an MES Waiver request, or was denied an MES Waiver.

## **3. Waiver Granted**

The entity submitted a request for an MES Waiver that was granted by the Agency.

## **4. Need Info**

(Incomplete Submission)

The Year-End Report submission is incomplete. The entity is required to provide any missing supplemental documentation.



# Small Business Safe Harbor

# What if my total project workforce is less than 8 individuals for PY 25-26?

Companies that meet the following criteria are eligible for IPA's **Safe Harbor Approach** if they can demonstrate a good faith effort to comply with the MES. These entities are considered compliant with the MES. The required Safe Harbor activities are outlined on the next slide.

This approach applies to entities that:

- Have fewer than 8 employees, and
- Hired new staff during the 2025-26 Program Year, and
- Did **not** hire an EEP and **do not** otherwise meet the MES by having an EEP on staff



# What is required to be considered for Safe Harbor?

To demonstrate a good faith effort to comply with the MES, entities must complete at least one activity in three of the five categories from the list below.

1. Utilize the Energy Workforce Equity Portal
2. Engage in Local and Community-Based Recruitment Efforts
3. Conduct Outreach to Specific Equity-Focused Groups
4. Post Job Opportunities on State-Sponsored Platforms
5. Collaborate with the Program Administrator

Examples of specific activities that apply can be found in the Program Guidebook in section 7B .

Entities are required to maintain records of their recruitment and outreach efforts. The documentation must be provided as part of the entity's MES Year-End Report. Failure to perform at least one activity in three of the five categories will result in a finding of non-compliance with the MES.





# MES Waiver Request Process

# Waiver Overview

All entities should be working to make progress and achieve compliance with the MES.

If, despite significant efforts, your organization determines that prior to June 1, 2026, it will not achieve the 14% MES goal for Program Year 2025-26, your organization is encouraged to request a waiver.

The Program Administrator will accept waiver requests on a rolling basis.

Waiver requests are evaluated against a scoring system and a minimum of 20 points is needed to grant a waiver.

# Waiver Requirements

The Agency will grant waivers in rare circumstances where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standards. Per the Long-Term Plan, waiver requests should include:

1

A brief narrative describing the entity's effort to recruit EEPs prior to the start of project development, including utilization of the Energy Equity Workforce Database developed by the Agency as well as the following:

- Working consistently and assertively with approved State job training and workforce development programs to recruit a diverse workforce and provide evidence of outreach.
- Maintaining applications of individuals not selected for an opening for contact regarding future project openings.
- Participating in job fairs and related local community events to recruit a diverse workforce.

2

Evidence of efforts to hire or contract with EEPs, such as communications with affiliated CBOs and/or training program facilities, State workforce hubs, union hall registers, professional development associations, etc. This should include the date of contact, the agency official and title of the individual contacted.



Waiver submission form linked at:  
<https://illinoisshines.com/minimum-equity-standard/>

# Waiver Requirements (cont.)

- 3 Efforts to proactively establish contracting relationships with EECs.
- 4 Advertising or formal solicitation using various platforms of targeted social media. Engagement in direct and extensive outreach to appropriately-targeted associations or other relevant organizations to notify them of the project opportunity.
- 5 Evidence that the entity posted all solicitations on appropriate State agency websites, include direct targeted e-mail alerts to appropriate respondents who have registered with State agencies to learn of opportunities.

Completed waivers and/or supplemental documentation should be sent to [MES@IllinoisShines.com](mailto:MES@IllinoisShines.com) or [admin@IllinoisShines.com](mailto:admin@IllinoisShines.com)



# Waiver Appeal Process

A Program participant can appeal any and all decisions made by the Program Administrator to the IPA. While the Program Administrator is an extension of the Agency and works in lockstep with the Agency, the Agency offers this route to Program participants as a matter of course.

Appeals should be sent in writing to the IPA within 2 weeks of the determination being appealed.





## MES Combined Report – Compliance Plan Section

# MES Compliance Plan Recap

All AVs and Designees are required to submit MES Compliance Plans for the new Program Year.



## Outline of AV or Designee plan to achieve the MES for the delivery year

- MES Compliance Plans explain how the AV plans to meet the 14% MES for all projects submitted to Illinois Shines in the 2026-27 Program Year.



If an entity applies to be an AV or Designee during a delivery year, Compliance Plans are required at time of initial application



# MES Compliance Plan Overview

The MES Compliance Plan is intended for participating organizations to commit to complying with the upcoming Program Year's MES requirement. Required data and information include:

- A narrative description of how the organization will ensure that at least 14% of its workforce will be EEPs
- Projected workforce total for the upcoming Program Year, including the projected number of EEPs currently in that workforce, and the number of EEPs the entity seeks to hire to achieve compliance.
- Anticipated outreach efforts the entity intends to use to connect with EEPs

Achieving compliance with the MES for Program Year 2026-27 means that at least 14% of an AV's or Designee's Illinois-based project workforce is comprised of EEPs.





## Consequences of Non-Compliance

# Types of Non-Compliance



Entity fails to submit the *MES Combined Compliance and Year-End Report* by the deadline



Entity fails to meet the required MES percentage in a given Program Year, as evidenced in their Year-End Report



Entity's Year-End Report receives a "fail" rating and its MES waiver request is denied



Entity fails to adhere to its MES Corrective Action Plan



# Enforcement of Standards

Non-compliance with the MES may lead to disciplinary consequences, including but not limited to:

1

Notice of Non-Compliance, with information on how to cure the deficiency

2

Suspension of the entity's ability to submit project applications to IPA programs

3

Violations could potentially result in the AV or Designee becoming suspended from the IPA's programs for an entire delivery year



# Resources

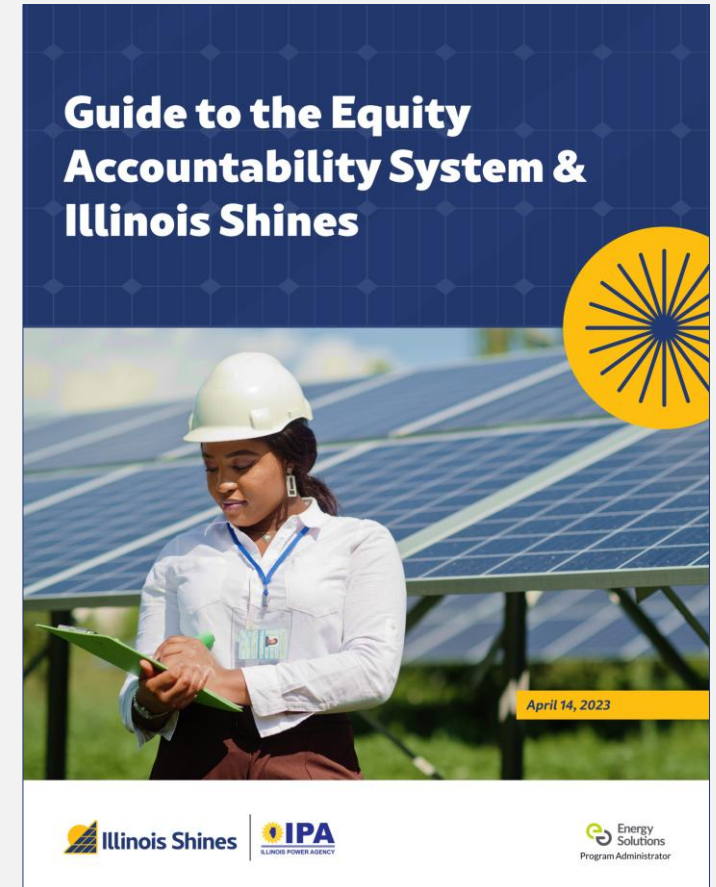
# MES Resources

The Program website's Equity Accountability System page offers a suite of resources for Approved Vendors and Designees in meeting Minimum Equity Standards requirements, including:

- *Guide to the Equity Accountability System and Illinois Shines*
- *MES Combined Compliance and Year-End Report Template – Program Guidebook Appendix Q*
- MES FAQs
- Recording, slides and Q&A from this webinar

The Program Administrator holds weekly office hours each Wednesday at 10:00 a.m. CPT, allow individual stakeholders to conference with the team's Sector Strategists and other subject matter experts. Zoom links can be found in the weekly Program announcements.

In addition, the Program Administrator's Sector Strategists support 1:1 meetings with stakeholders.



Find MES resources at:  
<https://illinoisshines.com/equity-accountability-system-hub/>

# Sector Strategist Support for Illinois Shines

There are Strategists on the Program Administrator team to support stakeholders in this process.

Strategists are available across each of the six sectors

## Small DG

SmallDG@IllinoisShines.com

## Large DG

LargeDG@IllinoisShines.com

## Community Solar

CommunitySolar@IllinoisShines.com

## Community-Driven Community Solar

CommunitySolar@IllinoisShines.com

## Public Schools

Schools@IllinoisShines.com

## Equity Eligible Contractors

EEC@IllinoisShines.com

General and ongoing technical support can always be accessed by emailing [admin@IllinoisShines.com](mailto:admin@IllinoisShines.com)

MES Compliance questions can be directed to [MES@IllinoisShines.com](mailto:MES@IllinoisShines.com)



# Questions

**Thank you!**

