

Questions & Answers from May 21, 2026 Welcome to Program Year 2026-27 Webinar



Illinois Shines Program Administrator
(877) 783-1820 • admin@illinoisshines.com
www.illinoisshines.com

General

Is there a deadline to apply to be an Illinois Shines Approved Vendor for the 2026-27 Program Year?

- There is no deadline to apply to become an Approved Vendor (AV). However, entities must have an approved AV application and be in good standing with the Program in order to participate. Please visit <https://illinoisshines.com/become-an-av-or-designee/> for more information and a link to the AV application.

If a company is applying to be a new Approved Vendor and has upcoming projects that need to begin before July 1, 2026, would it be best to apply today, or to wait until June 1?

- There is no need to wait to apply. Please note that an entity must be approved as an AV before it interacts with customers as such.

If a company is still waiting for Illinois Commerce Commission (ICC) approval of their Distributed Generation (DG) Installer Certification, must they wait to apply as a new Approved Vendor (AV) until that certification is received?

- You can go ahead and submit your application so that review can begin, and the Program Administrator will follow up for any additional documentation that is needed.

Can the Program share information about the expected return to the 10-day application processing target including for Small DG Part I and Part II applications for which processing time is currently exceeding the target?

- The Program strives to maintain the 10-business day service level for application review for all project categories. Recent submission volumes, well in excess of what is typical, have temporarily lengthened the time it takes to review applications, and the Program also allocated staff resources to maximize reviews of Part I Verifications under the 2024 REC Delivery Contract to support stakeholders. The Program has added capacity to address the high queue volumes and anticipate returning to the 10-day SLA; however, it may take several weeks to meet that goal, particularly if the Program receives a spike in application submissions at the start of the new Program Year.

If you are submitting a project for the Community-Driven Community Solar category, can you submit and/or receive preferential place in line by June 1?

- CDCS applications may be only submitted within the 90-day application window that begins June 1, 2026 and concludes August 30, 2026.

For a Public Schools project, is the REC Delivery Contract term length selectable between 15 years and 20 years, and does the structure include annual payments tied to yearly energy production?

- Beginning on June 1, 2026, distributed generation (DG) projects submitted to the Public Schools category will be awarded a 15-Year REC Contract, in accordance with the Public Act 104-0458. Public Schools DG projects up to and including 25 kW in size will receive 50% upfront payment at Energization and the rest is paid out ratably over 6 years. Public Schools DG projects over 25 kW in size will receive 15% upfront payment at Energization and the rest

ratably over 6 years. All Community Solar projects submitted to the Public Schools category and awarded capacity will continue to be placed on the 20-year contract. For Public Schools CS projects REC payments will be based upon actual REC deliveries (adjusted for subscription levels for community solar projects).

Updated Consumer Protection Requirements

Is the \$20 REC Adder being introduced in the 2026-27 Program Year only for Stranded Small Distributed Generation (DG) customers, or for all Small DG customers?

- The \$20 Small DG REC Adder being introduced in Program Year 2026-27 is distinct and separate from the existing Stranded Customer REC Adder and is only for customer-owned Small DG projects.

For purposes of the customer-owned system REC Adder, how can an Approved Vendor demonstrate that the Investment Tax Credit was not taken? Is that done via a Certificate of Completion, or does an AV need a customer's tax filing?

- Approved Vendors are responsible for ensuring any project applications submitted requesting the Small DG REC Adder qualify for that Adder. This includes confirming with the customer that they will own the project and have not/will not take the Federal Investment Tax Credit (FITC). As the AV discusses the project with the customer, it should confirm these details and explain these requirements before asking the customer to sign the Disclosure Form. The Program is not requiring any additional information/documentation from the AV demonstrating the customer did not take the FITC. As with all Program requirements, compliance is subject to Program audit.

Additionally, the project application will provide the AV with the ability to request the adder. If requested, the AV must complete an attestation, "By checking this box, I certify that this project is a Small Distributed Generation customer-owned project as defined by the Agency in the Program Guidebook, and will not receive the ITC or residential energy tax credit, therefore request the Small DG Customer-Owned \$20/REC adder."

Is it correct that projects approved on the special May 29, 20226 ICC meeting would be governed by the 2024 REC Delivery Contract?

- That's correct.

Regarding Illinois Shines contract requirements, our company passes on all of the REC value to the customer through our Power Purchasing Agreement (PPA) pricing. In a PPA, whether there is REC value or none highly impacts the PPA rate. How could we be required to not change the terms of the contract if we're not selected for a REC Contract?

- Whether your contract is contingent upon approval in the Illinois Shines program is up to individual vendors. The new requirement is that if there will be no change to contract terms if the project is not selected for a REC Delivery Contract, that must be explicitly stated.

Regarding Section C.3. of the Program Year 2026-27 DG Contract Requirements which outlines the early termination requirements, if a project is a cash sale, and the customer 100% owns the system after energization, does an explanation need to be included in contract?

- No. The new requirement relates to Lease/Power Purchase Agreements (PPA) but not Purchase (customer-owned) systems. Please see Section C.3 of the PY2026-27 DG Contract Requirements for more details.

The Program Guidebook's payment terms table (in Section 8.B) groups "DG on Public Schools" in the same merged payment-structure cell as Small DG for the 2026 15-Year REC Delivery Contract, with "50% upfront payment at Energization, and the remainder ratably over 6 years" which was explained as paid ratably over the subsequent 24 quarterly periods (6 years). The table shows this treatment applying to Public School DG with no size qualifier listed. Can the Program confirm >25 kW AC receive 15% upfront followed by quarterly payments?

- Starting June 1, 2026 Public School Distributed Generation projects up to and including 25 kW in size will receive 50% upfront payment at Energization and the rest paid out over 6 years. Public School Distributed Generation projects over 25 kW in size will receive 15% upfront payment at Energization and the rest over 6 years.

For a new Small DG project, if a customer is getting a small system and the amount of the SREC is approximately \$1000, is it expected that half will be paid up front (after the typical timeline after installation) and that the client will then be paid out \$20 each quarter for the following six years? Considering the amount is so small, has the Program considered a minimum incentive amount that might be paid out under a different payment structure?

- The REC Delivery Contract does not consider REC purchase payment amount to determine payment structure. Any Small DG project will get paid out 50% + quarterly payments for 6 years. So, 25 payments. In the example provided, the first invoice for a \$1000 incentive would be \$500. Then there would be a quarterly invoice for \$25 for 6 years, totaling 24 additional payments for the remaining \$500. Additionally, it is up to each AV to decide how it wants to structure pass-through payments to its customers, as long as that structure is consistent with already existing contractual obligations.

Regarding the updated minimum contract requirements, can the program define what "ratable quarterly payments" means, and specifically, how each payment amount is calculated after an upfront payment?

- This requirement means that 50% is paid out up front with the rest paid out in equal payments, each quarter, over six (6) years. So, the remaining 50% will be paid out over 24 quarters, or approximately 2.08% each quarter.

What actions if any are being taken for Small DG customers with project applications submitted prior to May 1, 2026 to receive 2025-26 REC prices?

- As a result of the passage of the CRGA, all Small DG projects receiving a REC Delivery contract on or after June 1, 2026 will receive the new payment structure.

Per [this announcement](#), the Program shared that applications that were Part I Verified by May 14 would be submitted for the new May 29 ICC meeting, enabling them to be eligible for 2025-26 REC prices and to utilize the 2024 REC Delivery Contract.

Is the new Distributed Generation REC passthrough explanation application field an open text field, or will it be calculated based on other inputs?

- It will be an open text field.

Can you provide an example for the Distributed Generation REC passthrough explanation since it is an open text field?

- An example for a \$5,000 total pass-through to the customer might be, "\$2,500 will be paid upon the utility's payment of the first invoice, with the remaining money paid out in equal quarterly payments over X years."

Can the Program explain how the \$20 REC adder for Small DG will work, and the actual REC price for <10 kW and 10 - 25 kW projects after the adder?

- The \$20 Small DG REC adder will only be available for customer-owned small DG projects that do not take the Federal Investment Tax Credit. Program Year 2026-27 REC Prices, to which REC adder will be added, are provided in Section 1.J of the Program Guidebook.

For the new documents for project applications, what is the difference between the Customer Contract and the Executed Sales Contract?

- For purchase systems, Approved Vendors will need to submit both the AV-customer contract (covering REC obligations and any potential passthrough incentive payments, for example) and the separate installation contract (sales contract, lease, or PPA). If the AV is also the installer and all of information is in a single contract with the customer, only that contract needs to be submitted.

For situations where a new Disclosure Form is needed after June 1 to reflect the new changes, does the customer need to sign the new Disclosure Form and the contract?

- Please see the updated Disclosure Forms - Circumstances Requiring new Disclosure Form Issuance and Signature document at <https://illinoisshines.com/wp-content/uploads/2026/05/Circumstances-Requiring-New-DF-Issuance-and-Signature-v260506.pdf>.

My company has assisted customers who were stranded by solar companies who went out of business. In some cases, the customer has not received their promised pass-through payment and the project is stuck waiting for Part II verification. What is the path forward for these customers?

- Unfortunately, some stranded customers have projects that are already on a REC Contract between an out-of-business AV and the relevant utility. These projects cannot be assigned to a new AV if the original AV is unavailable to approve the assignment. The IPA and Program Administrator are exploring potential options for these customers.

Contracting Process Changes, Co-Location Affidavit, and Co-Location with Non-Illinois Shines Projects

Regarding the updated co-location guidelines on community solar projects being sized up to 10 MW, does the 10 MW limit include co-located project(s) that have executed their REC contract before June 1, 2026?

- Yes, the size limit is inclusive of any co-located community solar projects.

In an example where a parcel has three 5 MW projects (A, B and C), and A was ICC Approved in 2025, can we submit B and C on June 1, 2026 to be eligible according to the co-location of 10 MW rule? Or can we submit B as an Illinois Shines/Adjustable Block Program project and develop C as a non-Illinois Shines/Adjustable Block Program project?

- This would not be allowed as the aggregate nameplate capacities of the projects exceeds 10 MW. The 10 MW limit for co-located projects applies across all program years, not just the 2026-27 Program Year.

Additionally, Projects approved by the ICC after June 1, 2026 may not be co-located such that the aggregate nameplate capacity of the projects (whether participating in Illinois Shines, Illinois Solar for All, or no IPA-administered Program) exceeds 5,000 kW AC for DG projects or 10,000 kW AC for CS projects.

The 2026-27 Program Guidebook appears to newly restrict Large DG projects from participating when a 5 MW AC portion of a larger system that is over 5 MW AC includes non-participating Illinois Shines capacity that would previously have been eligible. Can the IPA speak to share rationale for this change, particularly since it could impact projects that are already in development?

- The Agency understands the amendments to 1-75(c)(1)(K)(ii) and 1-75(c)(1)(K)(iii)(3) of the IPA Act made by Public Act 104-0458 (CRGA) to mean any community solar or distributed generation project must be included the aggregate nameplate capacity of a co-located set, regardless of participation in the Illinois Shines program.

Will Small DG Part I Applications submitted prior to May 1, 2026 receive 2025-26 REC Prices?

- Per [this announcement](#), the Program shared that applications that were Part I Verified by May 14 would be submitted for the new May 29 ICC meeting, enabling them to be eligible for 2025-26 REC prices and to utilize the 2024 REC Delivery Contract.

Are re-batching workbooks emailed to AVs, with AVs needing to populate the workbook within the re-batch window in order to batch the project for REC contract award?

- The AV re-batching process occurs over SharePoint. When the re-batching/withhold window starts, AVs with verified projects will receive an email notification. An Excel workbook will be available in an AV's folder, and there is a row for each project with project details, as well as columns to withhold, opt-in, or create custom batches for contracting.

If, for example, a community solar project awarded Program Year 2025-2026 capacity has been withheld from submission, will this project start "fresh" and be subject to opt-in batching beginning June 1, 2026?

- Yes, if a project has been getting withheld from ICC submissions in the 2025-26 Program Year, it will start fresh with the first ICC submission after June 1, 2026. AVs can "opt-out" of four (4) ICC submissions, but then must submit to the fifth ICC meeting. The first ICC meeting submission under the new program year is expected to be July 16. So, July 16, July 30, August 6, and August 19 would be four ICC meetings for which an opt-out could occur, after which a project must be submitted via opting in to the September 3 ICC meeting or it will be permanently withdrawn.

Regarding co-location and the indication that for community solar projects, is it correct that co-location cannot exceed 10MWac across all programs?

- That's correct. Projects approved by the ICC after June 1, 2026 may not be co-located such that the aggregate nameplate capacity of the projects (whether participating in Illinois Shines, Illinois Solar for All, or non IPA-administered Program) exceeds 10,000 kW AC.

Does the updated co-location requirement apply to utility scale projects?

- This presentation only addresses the Illinois Shines program and does not address non-Illinois programs or IPA utility-scale procurements.

Can you clarify the reference to "non-IPA administered Program" on the updated co-location requirements and limits?

- Non-IPA Administered Program means projects that are not currently participating in the Agency's Procurement programs including Illinois Shines, Illinois Solar for All, and IREC competitive procurements.

Is an Annual Report due for a project that had a signed Disclosure Form but which has not yet been Part I submitted?

- The REC Annual Report is only a requirement for AVs with an active REC Contract. In this example, where the AV has only one project and a signed Disclosure Form but not a Part I submitted application, the project is not yet contracted and therefore no REC Annual Report submission is required.

If we submit a Traditional Community Solar project (including that is batched and paid) today, and assuming it meets the 5+ points scoring threshold, will the project be placed in order on the waitlist and in line for capacity when the new Program Year opens on June 1?

- Yes. TCS applications submitted in Program Year 2025-26 and which are batched and paid and meet the 5+ scoring threshold will be placed on the waitlist and in line for a capacity award when new capacity becomes available on June 1, 2026.

Key Portal Changes - Disclosure Forms

The three new DF fields are all listed as optional for third party-owned projects. Can the Program confirm that Small DG third party-owned projects have no new required Disclosure Form fields in the new program year, and that the generation of third party-owned Small DG Disclosure Forms processed through the portal API will not be impacted beginning June 1?

- There is one new required field for Lease/PPA Disclosure Forms ONLY if the AV listed is an EEC AV. Otherwise, there are no new required Disclosure Form fields for third party-owned projects regardless of whether submitted via portal, CSV, or API.

Equity Accountability System – Small and Emerging Business Designation

Can a small business have under \$4M in revenue in Illinois and qualify as a small business under the Small and Emerging Business designation? For example, if they primarily work in Wisconsin and seek to expand to Illinois, and their overall gross revenue exceeds \$4M but in Illinois it is less than \$4M, could they qualify?

- The consideration of gross revenue is not specific to Illinois but rather to the overall business revenue. A company with gross revenue exceeding \$4 million would not qualify as a Small Business under the SEB designation, regardless of location or state-specific revenue. If the business can demonstrate that it has been authorized to do business in a U.S. state, district or territory for less than 3 years, it may qualify as an Emerging Business under the SEB designation.

Equity Accountability System – Minimum Equity Standard

Regarding the new MES Combined Plan, would an EEC AV have to submit an MES Year End/Compliance Plan on this coming July 15, 2026? or not until July 15th, 2027?

- EEC AVs are required to submit a separate EEC MES Combined Compliance and Year-End Report that includes workforce information for Program Year 2025-26. For Program Year 2025-26, EEC Approved Vendors are not required to demonstrate compliance with the Minimum Equity Standard through the Year-End Report portion of the submission. However, they must submit a Compliance Plan demonstrating how they intend to meet the Minimum Equity Standard requirements for Program Year 2026-27 by July 15, 2026. Next year, EECs will complete the same MES submission as non-EEC AVs. Templates for this year's MES submission forms can be found in the appendix of the Program Guidebook and at the Minimum Equity Standard page of the Program website.

Is a Year-End Report required for a project with an executed Disclosure Form and Submitted Part I application?

- For purposes of MES compliance, the definition of "participation" can be found in the Illinois Shines Program Guidebook. Please refer to page 127 of the Program Guidebook for the full definition and applicable requirements.

We have specific questions around meeting MES requirements not covered by the FAQs. How can we speak directly to the Program team for support?

- For direct MES support, please contact the Program at mes@illinoisshines.com. Program staff can provide guidance on Minimum Equity Standard requirements and reporting obligations.

Equity Accountability System – EECs and Mentorship Program

Do woman-owned businesses qualify as Equity Eligible Contractors?

- No, WBE status does not qualify an entity as an EEC. EEC qualification criteria can be found on our website here: <https://illinoisshines.com/become-an-equity-eligible-contractor-eec-approved-vendor-or-designee/>. Separately, for purposes of the management and control requirement applicable to EEC Approved Vendors, WBE certification may be used as evidence to demonstrate management and control. However, WBE certification alone does not qualify an entity as an EEC.

Can you share more about the Illinois Shines Mentorship program, its purpose, who participates, and more information about the forthcoming stipend for Mentors?

- "The Mentorship Program was created to provide participants, or mentees, with training and presentations covering Program processes and requirements. Approved Vendors and Designees that are certified as Equity Eligible Contractors and/or are minority-owned, woman-owned, veteran-owned, disability-owned, or are considered small businesses are encouraged to apply. Additional information regarding Mentor stipends will be released by the Program at a later date. Please note that the stipend is intended for participating Mentors supporting the Mentorship Program.

To read more information on the Mentorship Program visit:
<https://illinoisshines.com/mentorship-program/>

As a small installer using a third party EEC to file our Illinois Shines applications, do our projects qualify for the additional \$5 REC Adder, or must we be an EEC Approved Vendor submitting our own applications?

- Only projects submitted by an Equity Eligible Contractor Approved Vendor to the EEC Distributed Generation category may receive the \$5 REC Adder. Please contact your EEC Approved Vendor directly.

Project Labor Agreements

For the Project Labor Agreement, is it a strict requirement to use unions?

- The Project Labor Agreement needs to be signed by a bona fide trade organization.

Can the Program share an example of an acceptable Project Labor Agreement?

- The Program will not provide examples of acceptable Project Labor Agreements; requirements are available in Section 4.R. of the 2026 Program Guidebook.