

# 2025-2026 Approved Vendor Manual: Response to Comments

## Overview

Illinois Solar for All (ILSFA) has reviewed the feedback from stakeholders and other interested parties on the proposed changes to the Approved Vendor Manual for the 2025-2026 program year.

A request for feedback on the proposed changes to the Approved Vendor Manual was issued on March 11, 2025, with public comments due on March 26, 2025. Three parties submitted written comments. Illinois Solar for All has considered these [written comments](#) and appreciates the thoughtful input provided by the commenters. Comments have been summarized and addressed below.

# Stakeholder Comments and Responses

## FEEDBACK #1:

*Pg 28 - "To establish an incentive level, a system location is considered a single building, (i.e., multiple projects at a single building would be considered a single system). Exceptions may be granted for locations on the same roof where it can be demonstrated that the projects serve different, unaffiliated tenants."*

*Pg 114 - "Co-location of distributed generation projects occurs when multiple projects developed by one entity or affiliated entities are located on a single parcel."*

*Pg 115 - "Distributed generation projects will be considered co-located if they are located on a single parcel unless retail electric account ownership is confirmed to be unaffiliated and serves distinct electrical loads. To prevent gaming (such as establishing separate utility accounts by parcel for what would otherwise be a single retail customer on a facility spanning multiple parcels), the program reserves the right to determine whether systems may be considered co-located across adjacent parcels in the case of systems serving affiliated customers."*

We believe co-location rules do not apply where Residential (Large) projects are located at a building that is not master-metered. The Approved Vendor Manual (p. 28) supports this interpretation by providing the following regarding exceptions:

*To establish an incentive level, a system location is considered a single building, (i.e., multiple projects at a single building would be considered a single system). Exceptions may be granted for locations on the same roof where it can be demonstrated that the projects serve different, unaffiliated tenants.*

While we appreciate the noted exception, we believe the exception should be the rule, and thereby save AVs and AVDs the extra time and work associated with seeking exceptions for projects that are already difficult to structure and that require a significant investment of AV and AVD resources just to bring the proposed project to the application stage. We request the Program to acknowledge, in the next iteration of the AV Manual, that co-location concerns are not triggered where a building is comprised of rental units that are individually-metered. At least one of the utilities, ComEd, is amending its interconnection process accordingly. We ask for the program to align its policy on this issue in the residential (Large) program with ComEdison's approach.

## RESPONSE #1:

Determining co-location for large residential projects should be determined on a case-by-case basis to ensure that projects that are approved by the program are servicing

appropriate communities. The ILSFA Program Administrator does not approve this change, and no change will be made at this time.

## **FEEDBACK #2 :**

The portal for submitting ILSFA applications is complex. This complexity is amplified when submitting multifamily applications located at an individually-metered building. For example, if a building has six individually-metered units, the portal would require 6 project applications. If a project has arrays on multiple buildings, the portal would require an application for each unit in each building. For example, at an affordable housing complex, an Approved Vendor might need to upload dozens or even hundreds of applications.

We believe this process must be simplified to allow for the efficiencies needed to make this subprogram work. An ideal approach on the portal would provide for input of project-wide information, building-wide information, and tenant-level applications that tie to the SREC contract value. This approach would minimize administrative burdens on both the Program Administrator and the Approved Vendors. Program agreement on this change would facilitate accurate cost estimates for customer proposals and allow project development to begin in PY8. We should not allow the extreme underutilization of this program to continue for another year.

Suggested document/data divisions

<b>Project-level</b>	<b>Building-level</b>	<b>Unit-level</b>
Ownership/Site-Control	One-line drawings	Allocated system production estimates
Overall Site Plan (showing inverter location and point of interconnection)	Building array data	Interconnection for the unit
Disclosure Form	Site Suitability Report	
Contract (including proof of Energy Sovereignty if applicable)	Shade Report and System Production Estimates	
Income-Eligible Certification; Whole Building Residential Solar (Large) Certification and Consent Form		



Materials and Warranties data		
Interconnection Agreement for the project		

## RESPONSE #2:

To increase efficiency for Approved Vendors that plan to submit 5+ residential projects to the program, the ILSFA Program Administrator is considering potential updates to the portal. However, due to the technological changes required to implement this feedback, the ILSFA Program Administrator does not approve of this change in the Approved Vendor Manual at this time. The submission of documentation for these projects is subject to the limitations of the portal, and any updates to the Approved Vendor Manual will be dependent on updates that are made to the portal. The ILSFA Program Administrator will keep this feedback in mind while pursuing portal improvements that address efficiency and administrative burden for vendors.

## FEEDBACK #3:

The REC pricing for Residential (Large) must increase to catalyze projects in this subprogram. Currently, the IPA is accepting public comments on its 2025-2026 Draft REC Price. We will submit specific comments under separate cover. In summary, the Residential (Large) REC prices have not been high enough in seven program years to complete more than four projects in this subprogram. The draft REC prices for Program Year 8 do not reflect the following costs if Approved Vendors choose to use a technological solution to guarantee that energy savings pass through to tenants:

- interconnection application costs (and the associated engineering costs),
- equipment costs (for per-unit energy allocation/monitoring), and
- administrative costs to submit these projects to the Program.

## RESPONSE #3:

Proposed REC prices for the 2025-2026 program year consider capital costs involved with each sub-program, and drafted REC prices may be found under the Illinois Power Agency's (IPA) [Request for Comments](#). Therefore, this is not a change for the Approved Vendor Manual, but the IPA will consider this feedback in revisiting REC pricing under conversations for the 2026 Long-Term Renewable Resources Procurement Plan.

## FEEDBACK #4:

*Pg 28 - "To establish an incentive level, a system location is considered a single building, (i.e., multiple projects at a single building would be considered a single system)."*



In order to make these projects doable, we need confirmation that the REC contractual counterparties will pay the Residential (Large) REC value for each unit application submitted. For example, one project for a six-unit building with 36kW (AC), with six applications, will receive the Large Residential REC value for each of the six units. In addition, we request clarification on whether a separate REC contract will be required for each unit.

#### RESPONSE #4:

Incentive value is determined by the sub-program, and the Approved Vendor Manual states that multiple projects at a single building are considered a single system for the purpose of determining incentive value. Exceptions may be granted where the Approved Vendor or Designee can demonstrate that each system serves individually metered, unaffiliated tenants. For this reason, the ILSFA Program Administrator does not approve this change, and no change will be made at this time. Proposed REC prices for the 2025-2026 program year consider capital costs involved with each sub-program, and drafted REC prices may be found under IPA's [Request for Comments](#).

#### FEEDBACK #5:

- Just as contract versions are provided, Program Administration should be required to provide versions of the Approved Vendor Manual (AV Manual) for previous program years.
- We have often had difficulty finding earlier versions of the AV Manual because, unlike Illinois Shines, there doesn't seem to be an Archived Documents section in the Resource Library. Instead, AVs must scroll through over 40 pages of announcements to locate relevant documentation, as there is no search function. This process is time-consuming and makes it harder for AVs to understand past requirements and program updates. Additionally, the 1 Last Updated 03/26/2025 Redline Appendix in the current AV Manuals does not provide enough detail to fully explain the changes that have occurred in order to fulfill this need.
- We have noticed that multiple links on the ILSFA website do not work and / or redirect to the incorrect document. For example, the announcement below takes you to version 5, not version 3.

## Approved Vendor Manual Version 3.0 Posted

6/17/2020

### Announcement

The Program Administrator has posted a redline version of the updated Approved Vendor Manual, which will take effect as the Program Year 2020-2021 begins on Monday, July 6, 2020. A clean version of the Approved Vendor Manual Version 3.0 is forthcoming and will be posted here and on the [For Vendors](#) page.

 [Approved Vendor Manual V3.0 Redline](#)

 [Approved Vendor Manual V3.0 Clean](#)

## RESPONSE #5:

To increase transparency and allow for easier access to historical Illinois Solar for All documentation, the ILSFA Program Administrator is working to build an Archive Library on the program website. However, the ILSFA Program Administrator does not approve of this change directly in the Approved Vendor Manual. There is potential for complicating the current Approved Vendor Manual with additional links and references that are no longer active, so these documents are best suited to be provided to stakeholders supplementally through the ILSFA program's website. The ILSFA Program Administrator appreciates this feedback regarding the transparency of previous documentation and welcomes any potential website errors directed to [marketing@illinoisSFA.com](mailto:marketing@illinoisSFA.com).

## FEEDBACK #6:

*Pg 7 - "The IPA is the state agency responsible for the implementation of the program. Day-to-day administration of the program is the responsibility of the Agency's Program Administrator, Elevate, and partner firms Shelton Solutions, Primera Engineers, CANDO, Encolor, and PACO Collective."*

Increased transparency regarding:

- What tasks are Partner Firms involved with and / or responsible for.
- What documentation Partner Firms will be handling (especially when personally identifiable information is involved). From a consumer protection perspective, AVs should be able to clearly communicate third party involvement.
- Who are the key contacts that AVs and consumers may expect to be contacted by?
- At what stage in the process may AVs and consumers expect to hear from Partner Firms?
- Whose authority do Partner Firms fall under? Program Administration or the IPA? There is minimal guidance regarding the contractual relationship between all parties involved.
- What certifications / qualifications do Partner Firms have?
- Confirmation that all Partner Firms hold a Certificate of Good Standing confirming compliance with the state of Illinois Business Services Department.

## RESPONSE #6:

To increase transparency, documentation and training will be supplied to the Approved Vendors to provide additional information about partner firms supporting the ILSFA program. The potential for adjustment of contractors and operations throughout the program year makes these details best suited to documentation and training provided to Approved Vendors. However, the ILSFA Program Administrator does approve of providing clarifying language in the Approved Vendor Manual of the roles and relationships with partner firms.. The ILSFA Program Administrator may also supplement this information upon inquiry from program participants and stakeholders.



### FEEDBACK #7:

- Will the Approved Vendor Photo Guide also be updated to reflect the removal of required photos within the proposed changes?
- The thumbnail displayed within the AV Manual references the 09.12.2022 version, whereas the link opens the April 2024 version.

### RESPONSE #7:

The ILSFA Program Administrator approves this change to update supplemental documentation linked in the Approved Vendor Manual to reflect updates made in the Approved Vendor Manual.

### FEEDBACK #8:

*Pg 145 - "If a site has been selected for onsite inspection, the Approved Vendor representative will contact the participant/host site to determine the logistics for the onsite inspection. The Approved Vendor representative will work with both the Program Administrator and the participant to schedule an appropriate time for the onsite inspection within two weeks of notification. It is the responsibility of the Approved Vendor to secure site access and ensure that a representative is present to accompany the Field Inspector during the inspection."*

The inspection process requires refinement. From a consumer protections perspective, considering the timings and selection process are dictated by the Program Administrator, there is minimal communication between the Program Administrator and the consumer specifically related to inspections.

- It is burdensome for the AV to be solely responsible for providing status updates to the property owner when the Program's inspection selection process is beyond the AV's control.
- We recommend mirroring a process more aligned with what we have historically experienced with the Illinois Shines Inspections, where Program Administrators / Inspectors directly coordinate with the property owner and keep the AV informed by copying them on all related correspondence. Program Administrator involvement in consumer communications would assist with overall understanding and mitigate customer frustration.
- Requiring AVs to have a representative on-site aligned with the Primera Engineers provided timeslots creates scheduling challenges and adds extra costs for the AV, especially for projects in Central Illinois or more rural areas.
- Since AVs already face considerable budget and time constraints, these challenges could make it difficult for small and emerging businesses to participate effectively in the Program.

## RESPONSE #8:

The current Illinois Solar for All inspection process is being reviewed for potential updates for future iterations of the Approved Vendor Manual. The review is underway at the time that this Approved Vendor Manual is published. Updates made to the Inspection process at this time may conflict with updates that are being considered for the project inspection process. The ILSFA Program Administrator does not approve the change at this time, but the feedback will be considered in future inspection process updates.

## FEEDBACK #9:

*Pg 143 - "The onsite inspections will be conducted by qualified Program Administrator Field Inspectors that will look at the overall quality of the system installation."*

*Pg 139 - "The ILSFA Program Administrator has developed and implemented a process for quality assurance of project systems, including system design review, photo documentation, and onsite inspections of a subset of installations"*

*Pg 139 - "The Program Administrator will inspect installations, looking at electrical and structural aspects of the installation and final approvals will be made by the Authority having jurisdiction and interconnecting utility."*

Qualified Program Administrator Field Inspectors is written as though it is a defined term, but we do not see a definition anywhere in the AV Manual. From previous communications we have had with the Program Administrator surrounding this topic, we understand this term to be misleading as the field inspectors are not required to hold specific certifications.

- We recommend that inspectors must hold relevant certifications, for example, Illinois electrical license or SolarEdge certification. If the Agency and the Program Administrator maintain that certification is not required, then we would recommend that the use of the word 'qualified' is reconsidered or defined.
- Furthermore, the information listed in the AV Manual, along with the On-Site Inspection Checklist references electrical codes, roof conditions, and structural supports which are all technical aspects that, in our opinion, require a certified / licensed professional. However, we have previously been informed by the Program Administrator that inspections are conducted to ensure that a project was built as specified in the Program application to meet Program requirements and is not an in-depth technical inspection. There appears to be a misalignment here and therefore further clarity is required.
- Without clarity and understanding surrounding the above points, AVs face issues with both safety and inefficiency. For example, during an on-site inspection, we were asked to gain access to the inside of a meter enclosure. This requires increased safety measures for AV staff, advanced notice to utilities in territories such as Ameren or the



City of Naperville, and may leave consumers without power for extended periods of time.

#### **RESPONSE #9:**

The current Illinois Solar for All inspection process is being reviewed for potential updates for future iterations of the Approved Vendor Manual. The review is underway at the time that this Approved Vendor Manual is published. Updates made to the Inspection process at this time may conflict with updates that are being considered for the project Inspection process. The ILSFA Program Administrator does not approve changes to compliance requirements for inspections, and no change will be made to those requirements at this time, but the feedback will be considered in future updates.

The ILSFA Program Administrator does not approve the change to inspectors' requirements, but recognizes that the term "qualified Program Administrator Field Inspectors" is not an industry standard nor a defined term. The ILSFA Program Administrator approves adjusting this inspector title and relevant language to clarify that the Program Administrator verifies qualification for the inspector services provided.

#### **FEEDBACK #10:**

*Pg 66 - "Non-Profit or Public Facilities projects where the participant purchases and takes ownership of the full or majority installation equity of the system and applies for any of the tax credits available under the Inflation Reduction Act of 2022 pursuant to the elective payment option."*

The following sentence then reiterates the elevated 65% savings requirement for this scenario. In light of the foregoing, as well as the new material on page 64 about including a state-sponsored Distributed Generation Rebate received by the customer in the Total Value of Electricity, I have the following suggestion: should the Manual clearly state (either on page 66 or page 64) that the "Total Value of Electricity" concept for the Participant Savings calculation will include any federal tax credit expected to be directly received by the participating nonprofit / governmental customer under I.R.C. Section 6417?

(For completeness, I'll also say that my comment above would probably also apply in principle to the Total Value of Electricity for a single-family homeowner who purchases a rooftop solar project and participates in the Residential Solar (Small) sub-program of ILSFA, although it seems unlikely that such a low-income household could realize much or any of the nonrefundable Residential Clean Energy Credit via personal income taxes under I.R.C. Section 25D.)



**RESPONSE #10:**

The ILSFA Program Administrator does not approve this change because the “Total Value of Electricity” within the Participant Savings calculation does not include federal tax credits. However, an update has been made to the Approved Vendor Manual to provide clarification that savings calculations for projects, including those expecting to receive the federal tax credit, do not include that expected federal tax credit.