

# Draft Approved Vendor Manual and Project Selection Protocol Updates

The Illinois Power Agency (the Agency) and the Illinois Solar for All Program Administrator are seeking feedback on the proposed updates to the Illinois Solar for All (ILSFA or Program) Approved Vendor Manual, Project Selection Protocol, and Participant Referral Pipeline for the 2026-2027 Program Year commencing on June 1, 2026.

The Agency will review comments submitted and then release a final version of the Approved Vendor Manual, Project Selection Protocol, and Participant Referral Pipeline. In general, comments will be published on the ILSFA website ([illinoisSFA.com](http://illinoisSFA.com)). However, should a commenter seek to designate any portion of its response as confidential, that commenter should provide both redacted and unredacted versions. Independent of that designation, if the Agency or the ILSFA Program Administrator determines that a response contains confidential information that should not be disclosed, it reserves the right to provide its own redactions. The Agency and the Program Administrator hope to see feedback from a diverse number of stakeholders to improve the Program for customers and vendors alike. Feedback on individual questions or existing language in the Approved Vendor Manual is welcome.

**Responses are due by Wednesday, April 14, 2026, at 5:00 p.m. CT and should be sent to [comments@IllinoisSFA.com](mailto:comments@IllinoisSFA.com).**

# 1. High-Level Changes to Draft Approved Vendor Manual

- In Section 1.3.3.1, the Agency is seeking feedback on impacts to participant savings from Illinois utility Low-Income Discounts Rates (LIDRs), which apply an income-based deduction to the customer's energy charges. Based on multiple factors, the discounts can result in an increase in savings, a lessening of savings, or an increase in out-of-pocket costs compared to a customer who does not invest in solar. Very few households are at risk of experiencing more out-of-pocket costs by participating in ILSFA, though the Program is committed to participant savings and strives to ensure ILSFA is a benefit to all customers. The Agency therefore proposes prioritizing selection for Residential Solar (Small) and Community Solar projects with no cost offers, and to require a demonstration of economic benefits for projects which contain ongoing fees.
  1. Have Approved Vendors seen impacts to existing ILSFA participants from LIDR enrollment? Have customers voiced any concerns about their offers as their LIDR has been applied?
  2. Aside from the proposed updates prioritizing projects with no-cost offers to income-eligible households, are there any changes the Program should consider to further encourage utilization of no-cost offers or otherwise ensure an economically beneficial offer?
- In Section 2.2, the Agency is seeking feedback on how a community adjacent to an environmental justice community (EJC) or income-eligible community (IEC) might demonstrate service to those designated communities for the purpose of eligibility in the Non-Profit and Public Facilities (NPPF) sub-program. The Agency recognizes that while the EJC and IEC maps are based on census blocks, community experiences are not always confined to a census boundary. This expansion of eligibility to adjacent communities in the NPPF sub-program intends to encourage the participation of entities who serve income-eligible residents of EJCs and IECs and are near, if not sited in, those designated communities.
  1. How might an entity in an adjacent census tract demonstrate sufficient connection to, and service of, income-eligible residents of EJCs or IECs? What portion of an NPPF host's services should be to residents of an EJC or IEC if they are not located in an EJC or IEC?
  2. Do stakeholders anticipate that this expansion of eligibility will further encourage participation in the NPPF sub-program for Critical Service Providers (CSPs) in adjacent communities whose community includes members of EJCs and IECs?
- Are the eligibility documents listed in the AV Manual easily accessible for Approved Vendors? Are there documents that may demonstrate eligibility that we have not included in our examples of acceptable documentation?

## 2. Draft Approved Vendor Manual Changes by Chapter

### CHAPTER 1

- Shared program funding details around the remaining Renewable Energy Resources Fund (RERF) allocated for the 2026-2027 Program Year.
- Detailed changes to the Environmental Justice Communities (EJC) Map data and methodology, as outlined in the 2026 Long-Term Plan. The EJC Map will be updated with data from the 2024 version of EJScreen, and the top 25% of communities across the service areas of each Regional Transmission Organization within the state will be designated as EJCs.
- Recognized the applicability of the Climate and Reliable Grid Act on the ILSFA Program, specifically in the areas of workforce requirement, Advance of Capital, the Non-Profit and Public Facilities sub-program, co-location requirements, and income verification pathways.
- Added clarification that the Appeal Process operates under a two-week deadline.

### CHAPTER 2

- Listed REC pricing for the 2026-2027 Program Year, as outlined in the 2026 Long-Term Plan.
- Updated the naming convention of the NCSP+ Energy Connector (previously known as the Clean Energy Connector) and the recent platform change from National Laboratory of the Rockies (previously known as NREL) to a new platform host.
- Changed the timing of the Energy Sovereignty carveout release and merging of the Residential (Small and Large) to January 1, as outlined in the 2026 Plan.

### CHAPTER 3

- Clarified the requirement for Approved Vendors and Designees to maintain up-to-date contact information with the ILSFA Program Administrator.

### CHAPTER 4

- Clarified that technology for multifamily residential buildings which permit a system to distribute energy to individual residential meters will be considered a single system under ILSFA Program Requirements.
- Added information on master metered residential building anchor tenant REC pricing for Community Solar. An income-eligible master-metered residential building acting as an anchor tenant will receive an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price.

### CHAPTER 5

- Proposed updating the savings term to 25 years in Disclosure Forms for Energy Sovereignty projects and leases and PPA projects with a buyout option in the first 15 years.

### CHAPTER 6

- Added a requirement for projects within Residential Solar or Non-Profit and Public Facilities sub-programs to verify property ownership at the time of Part I application through either 1) the current recorded property deed, or 2) the most recent property tax statement.

- Detailed income verification scales for third-party income qualifications to ensure a household meets ILSFA's 80% Area Median Income threshold.
- Added that self-attestation will be accepted in the Residential Solar (Small) sub-program for income-eligible customers residing in an IEC. An audit process will be developed in a separate stakeholder feedback process.

## **CHAPTER 7**

- Added information on customer contract review and requirements.
- Updates to brand design, ADA compliance, and consistency among program branding. Updated information on program messaging requirements surrounding marketing materials, approved messaging, and social media content.

## **CHAPTER 8**

- Added the ability for Approved Vendors to prepare projects and batches prior to the window opening.
- Updated the process for project assignment, requiring written notification to all affected parties when an Approved Vendor transfer occurs.
- Added a requirement that projects must be approved by no later than the second ICC meeting in July of the following Program Year in order to retain its Part I status for that original Program Year.
- Added information on Energization Extension requirements and considerations, including defined requirements for good cause extensions.

## **CHAPTER 9**

- Changed the timing of the Energy Sovereignty carveout release and merging of the Residential (Small and Large) to January 1, as outlined in the 2026 Plan.

## **CHAPTER 10**

- Updated the definition of co-located distributed generation and community solar projects, as amended by the Clean Energy and Reliable Grid Act.

## **CHAPTER 13**

- Clarified invoice schedules are dependent on the invoice requirements of the project's specific contract.

## **CHAPTER 14**

- Added external funding sources through state, federal, and non-profit programs that support Site Suitability outside of the Home Repairs and Upgrades Pilot. The Program coordinates with these entities through education and referrals to support customers seeking home repair opportunities.

## **CHAPTER 15**

- Expanded the number of hours SEBs may count towards meeting job-training portfolio requirements to include hours worked on projects that never reach Energization, as outlined in

the 2026 Long-Term Plan. Added the requirement that such projects must have met, at least, Part I approval and paid collateral.

- Updated the length of time Eligible Job Trainees are considered eligible to 5 years. Included an additional 5-year retroactive eligibility period.
- Added language to align Job Training annual portfolio requirements to the Program Year, with a period of transitions for new Approved Vendors.
- Updated information on workforce requirements to include Minimum Equity Standard (MES) as one of the two workforce requirements that Approved Vendors may choose to comply with.
- Added definition and registration process for Equity Eligible Persons and Equity Eligible Contractors. Approved Vendors who select to comply with the MES must have a percentage of their workforce made up of Equity Eligible Persons.
- Added MES reporting for the MES Combined Compliance and Year-End Report. This report must be completed by all Approved Vendors who select to comply with the MES at the start of each Program Year.
- Added guidance for non-compliance with MES, including MES Waivers, Corrective Action Plans (CAP), and Safe Harbor. Additional language on the CAP process will be added to the 2027-2028 Approved Vendor Manual update, including a period for stakeholder feedback.
- Added Project Labor Agreements requirements for community solar projects greater than 3 MW AC in size.

### 3. High-Level Changes to Draft Project Selection Protocol

- Permitted early access to rolling submission windows for small and emerging businesses. If submissions during an initial window do not exceed the available sub-program budget, early access to a rolling submission window will open for two business days prior to the rolling submission. Batched submissions will be accepted on a first-come, first-served basis and must not exceed \$200,000.00 for up to 25% of the remaining available funding across all small and emerging business submissions.
  1. Do stakeholders agree that two days is sufficient to improve small and emerging business access to a rolling submission window?
  2. Do stakeholders find that \$200,000 is a reasonable batch limit for early access to the rolling submission windows? The Agency intends to effectively balance the available budget with the accessibility of REC awards. The average Residential Solar (Small) project is \$40,000, which would allow SEBs an estimated five projects of priority in that specific sub-program, consistent with other SEB benefits rolled out in the 2026-2027 Program Year.
- Added prioritization points for ILSFA Approved Vendors qualifying as a “small and emerging business.”

Added prioritization points for no-cost offers to income-eligible customers of Residential Solar (Small) and Community Solar projects.

1. Are there other recommendations or alternatives for selection criteria that promote no-cost offers when project selection is necessary?
- Removed prioritization points for projects featuring energy sovereignty in the Residential Solar (Small) sub-program.
  - Continued prioritization points for Community Solar projects equal to or less than 1 MW to encourage smaller project submissions.

Changed Community Solar selection attributes to select only projects less than 2 MW in the General Remaining Selection stage if the total incentive value of >2 MW projects is less than 30% of the sub-program budget.

1. This process within the final General Remaining Selection stage functions to prioritize selection of small Community Solar projects if large projects are over-represented during the Project Selection process. Do stakeholders believe the 30% incentive value threshold should be removed entirely for Community Solar projects and replaced with a prioritization point for projects smaller than 2 MW in the General Remaining Selection stage? Is 2 MW an appropriate threshold for prioritizing smaller Community Solar projects?
  2. If stakeholders agree with removing the 30% incentive value threshold for Community Solar projects, is it also preferred to remove the threshold for consistency in Residential and Non-Profit and Public Facilities project selection?
    - For the Non-Profit and Public Facilities sub-program, are the 30% thresholds for selecting projects <100 kW and non-profits versus public facilities still appropriate to maintain?
    - For the Residential sub-programs, is a 30% threshold for ensuring participation in both Group A and B still appropriate to maintain?
- Added a project selection process for projects participating in the Home Repairs and Upgrades Pilot. If the incentive value of total submitted projects for the Home Repairs and Upgrades Pilot exceeds the available Home Repairs and Upgrades Pilot budget, the project selection will occur. Subject to available funding, projects will be selected based on rank order of the respective Prioritization Stage until the Home Repairs and Upgrades Pilot budget is met.
  - Clarified that “Anchor Type” and “Project Host” are not synonymous for the purpose of prioritization, where “Anchor Type” refers to the entity that is serving as a project’s “Anchor Tenant,” and the “Project Host” refers to the entity within which the project is sited.

## 4. Participant Referral Pipeline

The Participant Referral Process will be expanded into a more robust participant pipeline for the Residential Solar (Small) and Community Solar sub-programs, with the intent to have a program-maintained list of participants who have been income-verified. Active Approved Vendors with available solar offers may submit their contact information and offers to the Program to access the list of participants. Interested participants may indicate interest in joining the pipeline via the Program Administrator, ILSFA Call Center, ILSFA Grassroots Educators, or a local LIHEAP Administering Agency. Interested participants will be informed of the number of Approved Vendors participating in their area, solar offers, and how many outreach attempts to expect. Interested participants may inform the Program of the types of solar offers they are willing to accept, including sub-programs and offer types. If no applicable Approved Vendors are available (in the geography, for the site/roof type, etc., or serving the utility territory), the Program Administrator will check monthly and follow up with the potential participant if/when an applicable Approved Vendor becomes available. Community Solar Projects may utilize the Participant Referral Pipeline to fill new project capacity or for churn. Approved Vendors active on the Participant Referral Pipeline must regularly update project information, including expected waiting periods and length of waitlist, and initiate communications with interested participants in a timely fashion (no later than 5 business days). If an interested participant joins the pipeline and later declines to participate, they will be removed from the Participant Referral Pipeline. The Agency may request additional comments for the Participant Referral Pipeline in a follow-up stakeholder feedback process.



1. To implement the process in a competitively neutral fashion and better direct referrals, what are potential risks and benefits to allowing the customer to indicate which solar offers they are willing to accept?
2. How can the Program maximize the effectiveness of a Referral Pipeline? What information would be most useful to include in the referrals? What barriers should be considered and addressed for Approved Vendors participating in the Participant Referral Pipeline?
3. How can the Pipeline minimize extended waiting periods for qualified households? If the Pipeline had a reliable supply of interested and eligible potential ILSFA Community Solar customers, what would the timeline and milestones be for a complete subscription?
4. To further promote no-cost offers in ILSFA, should the referral pipeline be restricted to Approved Vendors with no-cost offers? For Residential Solar (Small)? Community Solar?