



Approved Vendor Manual and Project Selection Protocol: Response to Comments

2026-2027 PROGRAM YEAR

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 and Project Selection Protocol for the 2026-2027 program year.

A request for feedback on the proposed changes to the Approved Vendor Manual and the Project Selection Protocol was issued on April 1, 2026, with public comments due on April 14, 2026, and an extension was granted to April 20, 2026. Two parties submitted written comments. The Illinois Power Agency and Illinois Solar for All Program Administrator (Program Team) have considered these [written comments](#) and appreciate the thoughtful input from the commenters. The list of Approved Vendor Manual questions, along with comments, has been summarized and addressed below.

Stakeholder Comments and Responses

- 1. Have approved vendors seen impacts to existing ILSFA participants from low-income discount rates (LIDR) enrollment? Have customers voiced any concerns about their offers as their LIDR has been applied?**

COMMENT # 1:

“We know of just two AVs (community solar) that noticed customer bills with the LIDR, but neither has heard any customer concerns regarding the LIDR, solar and resulting costs. To our knowledge, the LIDR has not been implemented for Ameren customers.”

PROGRAM RESPONSE:

There were no concerns noted in the responses to the request for feedback. The Program Team will continue to monitor and request feedback on an ongoing basis.

- 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?**

COMMENT # 1:

The working group supports utilization of no-cost offers, including points to prioritize such projects, and does not believe any additional incentives will be needed.”

PROGRAM RESPONSE:

The Program Team appreciates the confirmation that the response to the request for feedback supports the utilization of no-cost offers. There were no additional proposed updates.

- 3. How might an entity in an adjacent census tract demonstrate sufficient connection to, and service of, income-eligible residents of EJs 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?**

COMMENT # 1:

“We think the demonstrations currently required for each project submitted in the NP/PF subprogram will demonstrate sufficient connections between NP/PFs in adjacent blocks and the EJC or IEC. As applicants are already required to provide a community engagement narrative in the Part 1 application, we recommend setting a standard for the narrative and providing feedback to fully ensure that project narratives suffice in serving income-eligible residents.”

PROGRAM RESPONSE:

The Program Team appreciates the feedback. The response to the request for feedback supports the utilization of the standard community engagement narrative to review entities that are located adjacent to EJs or IECs. There were no additional proposed updates.

4. **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 EJs and IECs?**

COMMENT # 1:

“We do. We understand that one AVD is already preparing to develop two projects in Chicago located in adjacent blocks. Other AVs had submitted for exemptions in the past only to be denied. Anticipate more project submittals particularly outside of the Chicagoland area. We anticipate a 20%-30% increase in sub-program participation.”

PROGRAM RESPONSE:

The Program Team appreciates the feedback.

5. **Feedback on Chapter 1: Minimum Equity Standards (MES)**

COMMENT # 1:

“The Solar for All Working Group has some concerns regarding the changes in CRGA that allow for compliance with ILSFA job trainee requirements via compliance with the Minimum Equity Standard. While we are in support of this change given the benefits of aligning ILSFA processes with those of IL Shines, and the additional support it may provide for EEPs and EECs, we have some apprehension regarding its impact on FEJA and OTP trainees that may not qualify as EEPs or EECs (i.e., not a graduate of CEJA workforce or contractor program, not a foster care alumnus, not formerly incarcerated, don’t live in an EIEC). Should a majority of the industry shift to MES compliance, what might happen to the prospects of those graduates? We recommend exploring future modification of the MES to include FEJA and OTP trainees. Simplifying and promoting pipelines for trainees to AVs to fulfill the MES would also be helpful. We also recommend continuing to require AVs to submit eligible trainee information in Part 2 of the application to collect data on ET usage.”

PROGRAM RESPONSE:

The Program Team appreciates the feedback and wants to clarify that current and former enrollees of both FEJA and CEJA job training programs, with the exception of the Craft Apprenticeship Program, qualify for both the ILSFA Job Training Requirements and may be counted as EEPs for purposes of meeting the MES.

If Approved Vendors select to meet ILSFA Job Training Requirements, they will continue to submit eligible trainee information in Part 2. Approved Vendors that select to meet MES requirements will need to complete the MES Year-End Report, which includes EEP and EEC information, which is collected at the end of the program year. Section 1-75(c-10) of the IPA Act establishes the MES, and the programs that qualify a person for EEP status are set by law. Thus, the ILSFA Program Administrator is unable to include OQP

trainees in this update. The Program Team will keep this feedback in mind for future updates, watch for trends in MES and job training requirement decisions, and be mindful of impacts to the workforce.

6. Feedback on Chapter 4: Multifamily residential with tech treated as separate systems

COMMENT # 1:

“We disagree with treating these configurations as a simple system. Year after year we continue to see underutilization of this subprogram. Outreach to Multifamily residential building owners by IPA cannot be the only solution. The problem lies in the structure of the program rather than a lack of outreach. AVs have not engaged in this subprogram, because it is very difficult to earn a profit. As technology evolves to allow energy to be distributed to individual residential meters within multifamily buildings, program rules should be structured to reflect that reality. Maintaining a single-system framework risks constraining participation and limiting benefits for multifamily residents who represent a significant portion of the population the ILSFA program seeks to serve. We should ensure program design keeps pace with available technology and maximizes participation and benefits for these households.”

PROGRAM RESPONSE:

The Program Team appreciates the feedback and concern about the design of the Residential Solar (Large) sub-program. The IPA requested feedback for the Draft 2026 Long-Term Plan and, based on feedback received, did not make changes to the consideration of a Residential Solar (Large) system as a single project. In Section 8.5.4 of the 2026 Long-Term Plan, the Agency commits to monitoring the development of this technology and its use in Illinois, and how it may fit into ILSFA and the REC Pricing Model in the future.

7. Feedback on Chapter 8: Small and Emerging Business Submissions

COMMENT # 1:

“While the ILSFA Working Group (including ILSFA AV members and SEBs) appreciate the ability to draft projects for submission prior to window opening, we strongly believe this will be insufficient to give small and emerging businesses (SEB) adequate support to equitably compete in the ILSFA small resi subprogram. Last program year, on two occasions, we saw the entire small resi budget taken up in a matter of days, with no subsequent rolling window period. SEBs do not have comparable staff or experience to compete at such a fast pace. Again, we urge IPA to not only allow for early drafting of project applications, but to also allow SEBs early access to the initial project window. A period of 5 working days may be a fair & equitable compromise. In addition, at the request of some AVs,

we would appreciate the Agency verifying the early access for application drafting will also include the ability to generate standard disclosure forms.”

PROGRAM RESPONSE:

The Program Team appreciates the feedback. Changes are being made to the Project Selection Protocol to address Small and Emerging Business prioritization. Additionally, an early access window exists. The Approved Vendor Manager team will provide education in the upcoming year to Approved Vendors with an emphasis on Small and Emerging Businesses on the best practices for utilizing the initial submission window and creating draft applications.

8. Feedback on Project Selection Protocol: Do stakeholders agree that two days is sufficient to improve small and emerging business access to a rolling submission window?

COMMENT # 1:

No. Small and emerging businesses should get early access to the initial window opening for a longer amount of time such as 5 to 10 days We are very concerned that the IPA’s approach here will do nothing to assist SEBs equitably compete in a very competitive small residential program. After speaking with AVs active in the subprogram, there remains significant interest in developing these projects. We urge the Agency to do more by granting early access to the initial project window.

PROGRAM RESPONSE:

The addition of prioritization points for SEBs in the 2026-2027 Project Selection Protocol is intended to address SEB prioritization for the initial submission window. We believe early access to rolling submission is more impactful than early access to the submission window. When Project Selection is triggered, projects submitted during the initial submission window are scored based on attributes- that will now include 2 points for a project submitted by an SEB. None of the attributes are the timestamp of the project submission during the initial submission window and Project Selection process. If Project Selection is not triggered, that means the total value of the projects submitted is within the budget and carveout amounts, and so are all selected unless carveouts aren’t met. An early submission during the initial submission window does not provide any scoring benefit, and so does not provide a selection benefit. However, projects submitted during a rolling submission window receive priority based on the timestamp of submission.

9. Feedback on Project Selection Protocol: 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.

COMMENT # 1:

Yes

PROGRAM RESPONSE:

The Program Team appreciates the feedback.

- 10. Feedback on Project Selection Protocol: Are there other recommendations or alternatives for selection criteria that promote no-cost offers when project selection is necessary?**

COMMENT # 1:

Given the limited budget, we do not recommend a REC adder.

PROGRAM RESPONSE:

The Program Team appreciates the feedback. REC adders are established through the IPA's Long-Term Plan, and there were no changes to existing ILSFA REC adders in the 2026 update.

- 11. Feedback on Project Selection Protocol: 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?**

COMMENT # 1:

We remain uncertain about the goal that IPA is seeking here. If the goal is to assist SEBs with community solar, and the assumption (or data-supported finding) is that SEBs are more likely to develop community solar projects under 2 MW, we support replacing the threshold with prioritization points. Otherwise, we recommend determining what other project characteristics are associated with SEBs and using prioritization points as appropriate.

FINAL RESPONSE:

The goal for the threshold is to ensure a diversity of projects without a formally set carveout. The Program Team sees the threshold as a tool to promote further diversity of projects within the sub-program. For instance, the goal of the Group A and Group B project threshold is to discourage having 90% of incentives are going to projects in one group and 10% in the other, if a more diverse selection could be achieved from the remaining unselected projects in the final stage. If that is already met, the Program Administrator applies the applicable point prioritization and ranking process to that selection stage.

- 12. Feedback on Project Selection Protocol: 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?**

COMMENT # 1:

Not having seen the data, we cannot comment on this but believe nonprofit projects should be protected. We do not recommend removing this threshold given the concentration of small residential projects in the ComEd territory.

FINAL RESPONSE:

The goal of the threshold in the Non-profit and Public Facility sub-program is to ensure at least 30% of the sub-program incentives are contracted for projects that serve either a non-profit or a public facility. The Program Team appreciates the feedback and will continue to monitor the impacts of this policy for future updates to the Project Selection Protocol.

- 13. Feedback on Project Selection Protocol: 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?**

COMMENT # 1:

We strongly believe that this is not the time to set up a participant referral pipeline program for the residential subprogram, as discussed below. We also have concerns about a participant pipeline for community solar projects, given the significant periods of time when there are no subscriptions available in either or both ComEd and Ameren territories. A lack of available subscriptions could leave participants languishing in a pipeline with no clear delivery date.

FINAL RESPONSE:

Thank you for the feedback. The Program Team is mindful to the necessary balance of participant demand and opportunity for any referral pipeline and agrees that a pipeline is likely unnecessary to fill available Residential Solar (Small) incentive or Community Solar subscription capacities in the coming program year. Section 4.5 of the Approved Vendor Manual will be updated to maintain facilitation of engagement to potential participants through existing Program processes (e.g. through the ILSFA website and collaborations with DCEO's Office of Community Assistance and local LIHEAP Administrators) and the Program Team will use the coming Program Year to seek feedback on the design and implementation from stakeholders and monitor demand for a pipeline.

- 14. Feedback on Project Selection Protocol: 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?**

COMMENT # 1:

Should the Agency proceed, we think that customers that choose to participate in the pipeline should not be permitted to choose a particular AV, otherwise the pilot could not operate in an unbiased fashion. Once a fair and equitable system

of AV rotation is established, that system should be adhered to. Each customer should be informed of how the pipeline works while also being given the option to proceed on their own. Should they choose to proceed on their own, they should be directed to an updated, accurate, and easy to use webpage of active AVs. This webpage should also accurately indicate which offers are no cost.

FINAL RESPONSE:

The Program Team appreciates this feedback and will consider further as a referral pipeline is developed and discussed in the coming months.

- 15. Note: Removal of collateral swap in the Approved Vendor Manual when a customer decides not to pursue solar, through no fault of the Approved Vendor.**

APPROVED VENDOR MANUAL LANGUAGE:

If a customer decides not to pursue solar, through no fault of the Approved Vendor, the Approved Vendor may request system removal through written notice to the IPA and Buyer. This written notice must be accompanied by a written acknowledgment from the customer that the removal of the designated system occurred through no fault of the Approved Vendor. If the system is removed, the collateral associated with the original system shall be forfeited unless the Approved Vendor submits a new project that is then ICC approved within 365 days of the initial removal. The collateral associated with the original system may then be applied to the resubmitted system (note that the collateral may only be applied to a resubmitted system once). If the resubmitted system capacity is greater than the removed system, the Approved Vendor will need to post the difference in collateral. If the resubmitted system is less than the removed system, the excess collateral shall be forfeited.

FINAL RESPONSE:

The Agency determined this is something that may be implemented in the next Long-Term Plan update. This will allow all interested stakeholders to provide feedback, and for the Agency to adequately tailor a proposal that considers all stakeholders' input.