



JUNE 4, 2026

# Approved Vendor Manual 9.0

2026 – 2027 PROGRAM YEAR

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# 1. Introduction

The Illinois Solar for All Approved Vendor Manual provides detailed guidance for Approved Vendors on the intent, requirements, and processes of the Illinois Solar for All (“ILSFA”) program, referred to in this Manual as the Program. It includes an overview of the Program scope, goals, and specific requirements, as well as detailed descriptions of processes from vendor registration through project approval and facilitation of Renewable Energy Credit (“REC”) contracts.

The ILSFA Approved Vendor Manual will be updated to reflect new or revised Program information. A red-lined version of the Manual will be posted on the ILSFA website and announced to stakeholders each time the Approved Vendor Manual is updated. Changes from previously released versions will be highlighted in redlining and added to an appendix at the end of the Manual. Version 9.0 of the Approved Vendor Manual will take effect on June 1, 2026, for the 2026-2027 Program Year. The Illinois Power Agency (“IPA” or the “Agency”), per the [2026 Long-Term Renewable Resources Procurement Plan](#) (the “2026 Long-Term Plan”), allocates funds and considers project applications within ILSFA based on “Program Years,” which track the same period as energy delivery years (June 1 of one year to May 31 of the following year).

The Approved Vendor Manual provides resources and information to help Approved Vendors and applicants navigate the Program’s requirements and processes, enabling them to successfully deliver benefits to Program participants. Through this Manual, other resources, and one-on-one support, the ILSFA Program Administrator will assist Approved Vendors in delivering energy benefits to qualified participants and foster the growth of the emerging solar market within Income-Eligible Communities (“IEC” or “IECs”) and Environmental Justice Communities (“EJC” or “EJCs”) across Illinois.

## 1.1. Illinois Solar for All Programs

### 1.1.1 PROGRAM WEBSITE

The [Illinois Solar for All website](#) features two distinct hubs—one for participants and another for vendors—to allow for a tailored user experience for every visitor. Approved Vendors and prospective vendors can find the latest news, updates, and Program information under [Vendors](#) on the website.

The Vendors hub provides information for solar companies seeking to join the Program, including vendor registration, vendor resources, environmental justice and income-eligible community maps, job training resources, and access to the Vendor Portal. Once registered, Approved Vendors receive unique login credentials to the Vendor Portal, which provides access to resources, an individual project and performance dashboard, and project submission and tracking through completion.

The Residents hub, which is the default landing page of the ILSFA website, provides information and resources for the public and other Program stakeholders, including resources on participant eligibility, Grassroots Education, Environmental Justice Communities, Environmental Justice Community self-designation, and more. Approved Vendors, prospective vendors, and interested stakeholders can sign up for [Program updates](#) to receive the latest information about ILSFA.

### 1.1.2 LEGISLATION AND ADMINISTRATION

ILSFA is administered pursuant to Section 1-56(b) of the [Illinois Power Agency Act \(20 ILCS 3855\)](#), known as the IPA Act, as updated by [Public Act 99-0906](#), known as the Future Energy Jobs Act (“FEJA”); [Public Act 102-0662](#), known as the Climate and Equitable Jobs Act (“CEJA”); and [Public Act 104-0458](#), known as the Clean and Reliable Grid Affordability Act (“CRGA”). The IPA is the state agency responsible for the implementation of the Program. Day-to-

day Program administration is the responsibility of the Agency’s Program Administrator, Elevate, and subcontracted partner firms, Shelton Solutions, Primera Engineers, EcoHealth Strategies, Encolor, and The Purple Group.

	<ul style="list-style-type: none"> <li>• Program Administration</li> <li>• Coordination of Job Training and Minimum Equity Standard (MES) Requirements</li> <li>• Contracted with the Illinois Power Agency</li> </ul>
	<ul style="list-style-type: none"> <li>• Income Verification</li> <li>• Environmental Justice Coordination</li> <li>• Job Training and Minimum Equity Standard (MES) Requirements Support</li> <li>• Contracted with Elevate</li> </ul>
	<ul style="list-style-type: none"> <li>• Technical Support</li> <li>• Project Reviews and Inspections</li> <li>• Contracted with Elevate</li> </ul>
	<ul style="list-style-type: none"> <li>• Small and Emerging Businesses Support</li> <li>• Contractor Training</li> <li>• Contracted with Elevate</li> </ul>
	<ul style="list-style-type: none"> <li>• DEI Integration</li> <li>• KPI Program Development</li> <li>• Contracted with Elevate</li> </ul>
	<ul style="list-style-type: none"> <li>• Marketing and Communications Support</li> <li>• Contracted with Elevate</li> </ul>

### 1.1.3 PROGRAM FUNDING

Program funding comes from the Renewable Energy Resources Fund (“RERF”) and utility-held funds collected from the Renewable Portfolio Standard riders. The utility-held Renewable Portfolio Standard funds are collected from ratepayers through dedicated bill riders to fund renewable energy resources. Section 1-75(c)(1)(O) of the IPA Act allows for the allocation of up to \$50 million from utility-held funds annually for ILSFA. Held by the State of Illinois, the RERF was originally funded by Alternative Retail Energy Suppliers through Alternative Compliance Payments. The 2026 Long-Term Plan noted that the available funding for incentives in the RERF is nearly exhausted, particularly following the reopening of the 2024 Long-Term Plan in the fall of 2025, which advanced \$20 million in RERF funds to the 2025-2026 Program Year to allow customers and Approved Vendors to utilize expiring federal tax incentives. For the 2026-2027 Program Year, the Agency will allocate all remaining incentive funds from the RERF. As explained in the 2026 Long-Term Plan, because the level of RERF funding for the 2026-2027 Program Year will depend upon several factors, the Agency will calculate the remaining unobligated RERF funds at the end of the 2025-26 Program Year to determine the additional funding available for the Program beyond the utility funds. This dual funding source creates complexities in contracting for REC purchases. REC contracts are funded solely with one or the other funds, with a spending priority placed on utility-held funds.

## 1.1.4 LONG-TERM RENEWABLE RESOURCES PROCUREMENT PLAN

A complete description of Illinois Solar For All can be found in Chapter 8 of the 2026 Long-Term Plan. The 2026 Long-Term Plan outlines requirements for developing and implementing ILSFA, including annual funding, Approved Vendor requirements, consumer protections, vendor marketing guidelines, and incentive values. The 2026 Long-Term Plan also provides a framework for the interpreted intent of the legislation by laying out specific definitions of participants, including income requirements and eligibility, project eligibility, and job training and Minimum Equity Standard (“MES”) requirements. It establishes a goal for allocating 25% of all incentives to Environmental Justice Communities and Energy Sovereignty projects, among other important Program parameters.

The Agency updated the 2026 Long-Term Plan and filed it with the Illinois Commerce Commission (“ICC” or “Commission”) in October 2025. On February 17, 2026, the ICC issued its [Final Order](#) approving the IPA’s 2026 Long-Term Plan, and the IPA published it on the IPA website in spring 2026. The IPA will file a Compliance report on April 20, 2026, and again on June 1, 2026, to incorporate updates upon the effective date of P.A.104-0458. Version 9.0 of the Approved Vendor Manual incorporates resulting Program changes that will be effective in the 2026-2027 Program Year.

This Manual may be subject to change based on future changes to the 2026 Long-Term Plan. In addition to the approval of the Agency’s 2026 Long-Term Plan, many other aspects of photovoltaic (“PV”) development and installation in Illinois are under the jurisdiction of the ICC. These include the certification of distributed generation (“DG”) installers, interconnection standards, net metering tariffs, and tariffs allowing for a smart inverter rebate for non-residential PV systems.

## 1.1.5 INTENT OF THE ILLINOIS SOLAR FOR ALL PROGRAM

ILSFA is intended to bring the benefits of solar energy and the renewable energy economy to IECs and EICs across Illinois. Income-eligible households, non-profit organizations, and public entities participating in ILSFA see significant electricity savings. Participants are provided with comprehensive consumer protections important to the unique needs of these communities. Income-eligible households will not see upfront costs, with limited exceptions. While the Adjustable Block Program (ABP, rebranded as Illinois Shines)<sup>1</sup> provides incentives similar to ILSFA by delivering incentives through the purchase of RECs, ILSFA sets the value of incentives significantly higher than the Illinois Shines program. RECs purchased at a higher value through ILSFA are intended to provide cost recovery for the additional anticipated expenses of implementing ILSFA projects and allow a more significant share of incentives to be passed on directly to qualifying participants. Income-eligible households are defined as low-income if they earn below the 80% median income of the area, per the IPA Act, and IECs are defined as census tracts where at least 50% of the households earn no more than 80% of the area median income (“AMI”) per the 2026 Long-Term Plan.

ILSFA incentivizes participation in solar PV projects by qualified participants—whether as a system owner, lessee, or Community Solar project subscriber—through the purchase of RECs. ILSFA seeks to overcome historical barriers to developing solar for income-eligible households, such as a lack of taxable income needed to monetize tax-based incentives, a lack of access to capital, a lack of access to workforce development, and other institutional barriers that limit access to these opportunities. To promote ownership and local community wealth building, the Program reserves 25% of Program incentives for projects that exhibit Energy Sovereignty features, which include expedited

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<sup>1</sup> Although officially named the Adjustable Block Program in Illinois statute, the program has always had a public-facing branding of Illinois Shines and rebranded all materials in 2023 to be called Illinois Shines. This rebranding is applied throughout this updated Approved Vendor Manual, and other ILSFA and IPA materials.

participant system ownership and Community Solar cooperative models. Recognizing the disproportionate barriers small and emerging businesses face, the Program supports these businesses through several initiatives outlined in the 2026 Long-Term Plan and Section 3 of this Manual. In addition, the Program supports small and emerging businesses by training eligible businesses on ownership and management of solar projects and connecting them with services offered by other state entities.

## 1.2. Environmental Justice Communities

The principle of environmental justice requires that no segment of the population, regardless of race, national origin, age, or income, should bear disproportionately high or adverse effects of environmental pollution. Environmental justice is the fair treatment and meaningful involvement of all people, regardless of race, national origin, age, or income, concerning the development, implementation, and enforcement of environmental laws, regulations, and policies. ILSFA provides special consideration to Environmental Justice Communities by setting a goal that at least 25% of Program funds be allocated to projects located in or serving EJs. To help ensure that members of EJs are made aware of opportunities for participation in ILSFA, Grassroots Education funding is prioritized for EJs. Up to 60% of the Grassroots Education funding (or three percentage points of 5%) will be used for this purpose.

A methodology for determining which communities in Illinois qualify as EJs for ILSFA was established in the Initial Plan and was further refined by the Program Administrator and the Agency through a stakeholder engagement process. An [interactive mapping tool](#) allows users to identify qualifying EJs by census block groups across the state. This tool provides a map of these communities, and an address lookup feature allows users to enter any address in the state and determine whether that property is located within an EJC or adjacent census blocks. Following the initial launch in 2019, the EJC Map was updated in 2023 based on data from the 2020 census and EJScreen.

Section 8.12.2 of the 2026 Long-Term Plan outlines the data and methodology that have been used to update the ILSFA EJC Map for the 2026-27 Program Year. 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 (“RTO”) within the state will be designated as EJs. With this shift to designating communities across the distinct RTOs rather than across the entirety of the state, the Agency intends to address concerns that EJScreen may not accurately account for conditions in rural areas of Illinois. The Agency anticipates these changes will result in a designation methodology that is more representative of the various communities across the state. For the 2026-27 Program Year, both designations under the previous map from 2023 and the updated map from 2026 will be considered EJs, but only the updated map from 2026 will be used in the 2027-28 Program Year and beyond.

The 2024 Long-Term Plan established that the Agency will update the ILSFA EJC Map every five years to follow the frequency with which EJScreen and U.S. Census data sources are updated, with the next update anticipated for 2028. Following the removal of EJScreen from the U.S. EPA website on February 5, 2025, the 2026 Long-Term Plan established that the Agency will update the ILSFA EJC Map in 2026 to capitalize on the recency of EJScreen data, and will maintain the five-year updates at the Agency’s discretion to maintain a reliable cadence for project development cycles. The [Environmental Justice Communities Map](#) can be accessed on the Illinois Solar for All website.

In addition to EJs that have been designated based on the methodology established in the 2026 Long-Term Plan, the Program Administrator and the Agency have established a process for communities to request self-designation as an Environmental Justice Community. The EJC Map will be updated to reflect approved requests for self-designation and maintain those approved requests across future map updates. More information is available on the Illinois Solar for All website under the [Self-Designation Process](#), the [Self-Designation Application](#), and [Helpful Tips](#) for Self-Designation Applications.

## 1.3. Legislative Updates to ILSFA and Relevant Programs

### 1.3.1. CEJA UPDATES

The Climate and Equitable Jobs Act (CEJA), enacted as P.A. 102-0662, created new programs and design elements for ILSFA, which were introduced in the 2022 Long-Term Plan and are included in subsequent Plans. Several programs created by CEJA that are administered by other state entities may provide additional support for ILSFA projects. This section outlines those programs and further requirements for how the Program Administrator interacts with existing state programs, such as energy efficiency programs.

#### 1.3.1.1. SMALL AND EMERGING BUSINESS DEVELOPMENT

CEJA included several provisions to encourage business development. It requires the IPA to “make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program” and report on progress annually.<sup>2</sup>

The IPA Act does not define “small and emerging” business, but Section 8.2.3 of the 2026 Long-Term Plan provides definitions from other state and federal programs to inform its definitions of “small” and “emerging” businesses. The Agency defines a “small business” as any for-profit entity, independently owned and operated, that grosses less than \$4 million, and defines “emerging business” as a business that has been authorized to do business in any U.S. state for less than three years.

The Program Administrator supports small and emerging businesses by providing training on ownership and management of solar projects to eligible businesses and connecting them with services and programs offered by other state departments and organizations to ensure their participation in the Program. In addition, businesses located in IECs and those providing training on implementing Energy Sovereignty and community-driven projects can receive support as needed. Additional business training opportunities have been offered for Approved Vendors addressing relevant topics, including overviews of state certification requirements, marketing of services, ownership and management of projects, technical assistance in grant applications, and guidance on financial resources applicable to small businesses. Workshops for small and emerging businesses are announced and included on the [Events](#) page of the ILSFA website.

The [Small and Emerging Business Guide](#) covers a wide range of essential aspects of the Programs (both ILSFA and Illinois Shines) and markets, as well as financial incentives, consumer protections, certifications, and other Program topics. The [Small & Emerging Business Hub](#) centralizes key resources, tools, and information to help small businesses navigate the clean energy landscape.

The 2026 Long-Term Plan includes several additional considerations to continue to address barriers to participation by small and emerging businesses, including prioritization in project selection and early access to rolling submission windows. Because designation as a small or emerging business now has real competitive and financial advantages in both ILSFA and Illinois Shines, a registration process has been created as part of the Illinois Shines Approved Vendor registration. Further details about this process can be found in Section 3.3.1.

#### 1.3.1.2. ENERGY SOVEREIGNTY

To provide participants and communities participating in ILSFA with benefits beyond electricity cost-savings, 25% of funding for each sub-program per Program Year is reserved for projects that promote “energy sovereignty.” The 2026 Long-Term Plan provides the following definition of “energy sovereignty”:

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<sup>2</sup> 20 ILCS 3855/1-56(b)(2).

*Eligible low-income household or community organization having or being on a defined path to majority or full ownership of the photovoltaic generating facility or, in the case of a cooperative or community ownership model, a share or membership in the entity that owns the photovoltaic generating facility. For the purpose of this definition, “ownership” means not only legal title to the property but also the right to participate in decisions regarding the governance, maintenance, and use of the facility and to benefit from the use of that facility. For the purpose of this definition, “photovoltaic generating facility” means any equipment that generates electricity from solar energy. If the project includes associated energy storage equipment, the eligible low-income household or community organization is not required to, but may, own such storage equipment to qualify as an “energy sovereignty” project.*

All Energy Sovereignty projects must be compatible with and include contract terms providing for the purchase and transfer of 15 years of RECs generated from solar projects upon initial approval and Energization of a solar project.

Projects within the Residential Solar and Non-Profit and Public Facilities sub-programs can achieve Energy Sovereignty Designation through a purchase agreement (subject to applicable limitations on upfront costs) or a lease or power purchase agreement (PPA) with an early transfer of ownership at seven years or earlier after Energization. Residential Solar and Non-Profit and Public Facilities Energy Sovereignty projects will also receive a \$10 Renewable Energy Credit adder applied to the project’s REC contract for RECs delivered after the transfer of ownership is completed. Residential Solar and Non-Profit and Public Facilities Energy Sovereignty projects must include information on the cost and timing of the transfer of ownership and any ongoing costs (apart from Operations and Maintenance, which the Approved Vendor is responsible for, per the [Residential Solar and Non-Profit and Public Facilities Contract Requirements](#)) for the new owner within their third-party owner (TPO) or PPA customer contract.

Projects within the Community Solar sub-program can qualify for Energy Sovereignty designation through an ownership or a cooperative model. The ownership model includes a purchase agreement (subject to applicable limitations on upfront costs) or a lease or PPA with an ownership transfer clause that is triggered at seven years or earlier after Energization to give the participant ownership of the panels (which may correspond to their subscription to the Community Solar project). The cooperative model allows for a co-op organization to sell subscriptions to participant-owners of the co-op, with the participant receiving a low-cost subscription and any financial benefits of ownership.

As further detailed in Section 4.3, any ownership model used to achieve Energy Sovereignty designation for a Community Solar project must show ownership by an eligible participant (defined to include income-eligible households, affordable housing owners, and non-profits)<sup>3</sup> or over 50% of the total energy produced is proposed to be subscribed to by participants with ownership shares at the time of the Part I application.

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<sup>3</sup> 20 ILCS 3855/1-56(b)(2)(A)(i) requires the Agency to reserve “a portion” of Illinois Solar for All funding “for projects that promote energy sovereignty through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.”

<sup>4</sup> The Clean and Reliable Grid Affordability Act (CRGA) added clarifying language about also collaborating with LIHEAP Administering Agencies (LAAs). This is not a substantive change and reflects existing practices of the Program collaborating with any entity administering LIHEAP in Illinois.

### 1.3.1.3. EQUITY AND ENVIRONMENTAL JUSTICE PROGRAMS

In Section 5-60 of the Energy Transition Act, CEJA establishes the Jobs and Environmental Justice Grant Program with two sub-programs (both administered by the DCEO):

- The Equitable Energy Future Grant Program
- The Community Solar Energy Sovereignty Grant Program

These grant programs will award up to \$1,000,000 per application “to provide businesses, organizations, and community groups with capital needed to plan, develop, and execute” a renewable energy or energy efficiency project. The Illinois Department of Commerce and Economic Opportunity is currently reviewing applications for the Equitable Energy Future Grant Program and the Community Solar Energy Sovereignty Grant Program.

Per Section 1-75(c-20) of the IPA Act, Approved Vendors and Designees and their subcontractors must report demographic and geographic data, including racial and ethnic identity, for their project workforce. This data will be aggregated and published annually, ensuring transparency and public accountability.

### 1.3.1.4. ENERGY EFFICIENCY PROGRAMS AND ENERGY ASSISTANCE PROGRAMS

The IPA Act requires ILSFA to “be implemented in a manner that seeks to minimize administrative costs and maximize efficiencies and synergies available through coordination with similar initiatives,”<sup>5</sup> including energy efficiency programs and the 36 community action agencies (“CAA” or “CAAs”) and LIHEAP Authorized Agencies (“LAA” or “LAAs”) in Illinois that administer state weatherization and energy assistance programs.<sup>4</sup>

In addition to coordinating with these programs, the Program Administrator has created an [Energy Resources Guide](#) for Residential Buildings and Non-Profit Facilities to assist potential Program participants in locating resources that help participants overcome barriers to participation. The guide identifies energy efficiency programs and programs to address deferred maintenance, which may be required to make a building suitable for solar. The IPA and the Program Administrator will continue to work with utilities, administrators of the Low Income Home Energy Assistance Program (LIHEAP), the Illinois Home Weatherization Assistance Program (“IHWAP”), and other relevant organizations to develop opportunities to share referrals between ILSFA and programs that similarly address energy costs and energy burdens of income-eligible households and non-profit and public facility participants.

Since 2023, Illinois has been a pilot state on the U.S. Department of Energy (“DOE”) National Community Solar Partnership (“NCSP”) partnered with the U.S. Department of Health and Human Services (“HHS”) to develop and pilot the NCSP+ Energy Connector (“Connector”),<sup>5</sup> a platform that assists in connecting income-eligible LIHEAP recipients with community solar opportunities that provide strong consumer protections and long-term savings. The Connector is currently being implemented in Illinois, along with the District of Columbia, Maryland, Massachusetts, New Mexico, and Rhode Island. The Illinois Power Agency is partnering with DCEO’s Office of Community Assistance (“OCA”), which administers LIHEAP, IHWAP, and other income-eligible assistance programs,

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<sup>4</sup> 20 ILCS 3855/1-56(b)(2)

<sup>5</sup> Additional information may be found on the Department of Energy’s website about the [Community Solar Subscription Tool](#).

to connect local LIHEAP Administering Agencies with ILSFA. LIHEAP agencies began utilizing the NCSP+ Energy Connector to connect income-eligible households with ILSFA Community Solar projects in January 2025. Further information on the current status of the Connector can be found in Section 8.8.3.1 of the Long-Term Plan and Section 2.3 of this Manual.

### **1.3.1.5. CLIMATE BANK AND THE CLEAN ENERGY JOBS AND JUSTICE FUND**

CEJA established financial vehicles to aid in the deployment of clean energy and directs the Illinois Finance Authority to create a Climate Bank “to aid in all respects with providing financial assistance, programs, and products to finance and otherwise develop and facilitate opportunities to develop clean energy and provide clean water, drinking water, and wastewater treatment in the State.”<sup>6</sup>

Section 20-15 of the Illinois Clean Energy Jobs and Justice Fund Act creates the Clean Energy Jobs and Justice Fund, a non-profit corporation. The Fund “has authority to pursue a broad range of financial products and services”<sup>7</sup> that “foster the development and commercialization of clean energy projects, including projects serving low-income, environmental justice, and Black, Indigenous, and People of Color communities, and support project development by Minority-owned Business Enterprises and other contractors of color.”<sup>8</sup> The board of the Fund is instructed to consider a number of investment initiatives, many of which could affect ILSFA, including “a solar lease, power-purchase agreement, or loan-to-own product specifically designed to complement and grow the Illinois Solar for All Program.” The Program Administrator will work with the IPA and the board of the Clean Energy Jobs and Justice Fund to facilitate integration across the programs and provide information to Approved Vendors.

### **1.3.1.6. EQUITABLE ENERGY UPGRADE PROGRAM**

CEJA directed the Illinois Commerce Commission (ICC) to establish the Equitable Energy Upgrade Program, which “permits customers to finance the construction of energy projects through an optional tariff payable directly through their utility bill, modeled after the Pay As You Save system, developed by the Energy Efficiency Institute”.<sup>9</sup> Funds may be used for solar installations and other energy improvements. Pay As You Save (“PAYS”) can be a way to finance ownership of onsite solar, especially for residents of one- to four-unit buildings, since repayment is tied to the meter and passes on to any future occupant living in that unit. While participants of any income level can use this system, there may be synergies for participants eligible for ILSFA as a way to facilitate Energy Sovereignty.

As of January 2026, the ICC has opened a docketed proceeding to establish guidelines for the Equitable Energy Upgrade Program (“EEUP”). The Illinois Power Agency is a party in this docket and will continue to highlight potential areas of overlap or synergy between the EEUP and ILSFA.

## **1.3.2 CRGA UPDATES**

Public Act 104-0458, known as the Clean and Reliable Grid Affordability Act (CRGA), which takes effect on June 1, 2026, modifies some provisions of Illinois law as they relate to the Illinois Solar for All Program. This section outlines those changes and how the Program Administrator will implement updated statutory requirements.

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<sup>6</sup> 20 ILCS 3501/850-5

<sup>7</sup> Illinois Clean Energy Jobs and Justice Fund Act, §20-30(a), enacted through Public Act 102-0662 (2021)

<sup>8</sup> Illinois Clean Energy Jobs and Justice Fund Act, §20-25(a)(2), enacted through Public Act 102-0662 (2021)

<sup>9</sup> 220 ILCS 5/16-111.10(c)

### 1.3.2.1 WORKFORCE REQUIREMENTS

As updated under CRGA, beginning in the 2026-2027 Program Year, Approved Vendors will have multiple options to demonstrate that they have met workforce requirements. As of June 1, 2026, Approved Vendors now have the option to either comply with the Minimum Equity Standard (MES) or the pre-existing ILSFA job training requirements. Further details on workforce requirements, including the MES, can be found in Section 15 of this Manual.

### 1.3.2.2. ADVANCE OF CAPITAL

Changes in Illinois law under P.A. 104-0458 allow the Illinois Power Agency to propose a payment structure for ILSFA REC contracts under which Approved Vendors are advanced capital that is disbursed after the Commission approves the REC contract but prior to the Energization of the project. These new provisions in law, effective on June 1, 2026, allow the Agency to propose such payment structures to maximize equitable participation in the Program and overcome challenges facing the development of projects. The IPA plans to develop contracts that allow for these advances in anticipation of the 2026-2027 Program Year; however, the process for establishing the levels of advanced capital and the mechanisms by which the applicant will demonstrate the need for such an advance will be developed through a stakeholder process during the 2026-2027 Program Year. The stakeholder feedback process will focus on the development of the Advance of Capital mechanism and the timing of its future implementation.

### 1.3.2.3. NON-PROFIT AND PUBLIC FACILITIES REQUIREMENTS

Other changes under P.A. 104-0458 relate to the qualification of projects in the Non-Profit and Public Facilities sub-program, increasing the opportunity for eligibility in the sub-program. The changes in law provide that qualifying non-profits and public facilities that can demonstrate they serve income-qualified or Environmental Justice Communities “may potentially qualify for the program, regardless of physical location.” Additional changes to Section 1-56(b)(2)(C) of the IPA Act under CRGA explain how qualification of such non-profits and public facilities may be determined. Similarly, changes in law provide that master-metered multifamily buildings that primarily house income-eligible residents “may qualify” for the sub-program. The Agency will develop eligibility criteria and solicit stakeholder feedback on the proposals, including on the timing of implementation of these proposals, for inclusion in a future Long-Term Plan. As explained in Section 8.5.6.1 of the 2026 Long-Term Plan, the Agency is already expanding eligibility to Non-Profit and Public Facility projects located in adjacent census blocks.<sup>10</sup>

### 1.3.2.4. SYSTEM SIZE AND CO-LOCATION REQUIREMENTS

ILSFA has always included special requirements around projects that are co-located. A co-located project is defined as two or more distributed generation projects developed, owned, or controlled by or originating from the same developer or an affiliated developer and the serving affiliated loads (located in the same or adjacent parcels). Under the provisions of P.A. 104-0458, new requirements will take effect after June 1, 2026, for co-located distributed generation and Community Solar projects.

Beginning in the 2026-2027 Program Year, to give effect to the provisions of P.A. 104-0458, Approved Vendors will be required to submit an affidavit along with each distributed generation project application attesting that the

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<sup>10</sup> An adjacent census block is defined as a neighboring statistical geographic area that shares a common boundary with a census tract which is, at that point in time, designated as an Environmental Justice Community or an Income-Eligible Community.

project is not affiliated with another project such that, if the two projects were found to be co-located, would create an aggregate size greater than 5 MW.

With respect to Community Solar, P.A. 104-0458 states that “projects shall not be collocated with one or more other photovoltaic community renewable generation projects such that the aggregate nameplate capacity exceeds 10,000 kilowatts.” There are additional co-located requirements for Community Solar projects, explained further in Section 10.8 of this Manual.

### 1.3.2.5. INCOME VERIFICATION METHODOLOGY UPDATES

The provisions of CRGA allow the Agency to create pathways for income verification by ILSFA participants through self-attestation by the applicant, if the applicant lives within a low-income or Environmental Justice Community as defined under the IPA Act. Pursuant to the limitations outlined in the 2026 Long-Term Plan, the Agency will extend the self-attestation option to participants in the Residential Solar (Small) sub-program who reside in an Income-Eligible Community for the 2026-2027 Program Year. As directed by CRGA, the Agency will proactively explore approaches that make the income verification process less burdensome for residents of low-income or Environmental Justice Communities through stakeholder processes for potential incorporation in the future. The changes under P.A. 104-0458 have no impact on the pre-existing option for Community Solar participants to provide a self-attestation to support income eligibility. See Section 6.3.2 for more information.

### 1.3.3. OTHER NOTABLE LEGISLATIVE OR POLICY UPDATES

#### 1.3.3.1. LOW-INCOME DISCOUNT RATES

Section 9-241(d) of the Public Utilities Act directed the ICC to “conduct a comprehensive study to assess whether low-income discount rates for electric and natural gas residential customers are appropriate and the potential design and implementation of any such rates.”<sup>11</sup> The ICC determined that electric utilities with more than 3,000,000 residential delivery service customers in Illinois, or combination electric and gas utilities with more than 500,000 residential delivery service customers in Illinois, or gas utilities with more than 100,000 residential delivery service customers in Illinois, should offer a Low-Income Discount Rate (“LIDR”).<sup>12</sup> Discount levels are based on household income and can be updated annually, which makes solar savings in future years much less reliable. The LIDR reduces the economic value of solar for the customer, and ILSFA participation can reduce the economic benefit of the LIDR. The current ILSFA Disclosure Forms do not account for LIDR and therefore may overestimate the value of electricity to LIDR customers and in turn, overestimate the estimated savings. Accordingly, the Disclosure Forms currently affected by the LIDR will no longer display the savings calculation.<sup>13</sup>

LIHEAP customers in participating utility territories are automatically enrolled in their utility LIDR at the time of their LIHEAP grant approval, with existing LIHEAP participants being automatically enrolled at the time of LIDR rollout. Households earning 200 to 300% of the Federal Poverty Level may self-certify directly with their utility. Illinois natural gas utilities began rolling out their LIDRs in October 2024, and ComEd rolled out its electricity LIDR on January 1, 2026. Ameren already implemented the LIDR on their natural gas billing and are anticipated to roll out their electricity LIDR in October 2026, with final details of the tariff still pending as of February 2026. As the

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<sup>11</sup> 220 ILCS 5/9-241(d)

<sup>12</sup> Illinois Commerce Commission Low-Income [Discount Rate Study Report](#) to the Illinois General Assembly

<sup>13</sup> As of Spring of 2026, LIDR only impacts Disclosure Forms for Residential Solar (Small) customers with ComEd as their electrical utility provider. The Program Administrator anticipates expansion of LIDRs to other electrical utilities during the 2026-2027 Program Year and will update the Disclosure Forms accordingly.

LIDRs are rolled out by each utility, the LIHEAP Percentage of Income Payment Plan (“PIPP”) will be progressively discontinued, since both programs function to provide customers with affordable monthly bills.

Because a household’s LIDR is indicated on their natural gas and electric bills, the Program will accept current household bills showing enrollment in Level 1-4 discounts as acceptable documentation for household income verification. Further details are available in Chapter 6 below.

The LIDRs will reduce the energy burdens of income-eligible households in Illinois, and ILSFA participants should be encouraged to enroll for the benefits they qualify for. Households that are eligible for ILSFA also meet eligibility requirements for the LIDRs, and the Program will assume all ILSFA residential households will participate in the LIDR at the discount level shown on their electric bill, or, if the electric bill does not demonstrate current LIDR participation, based on the discount for which the verified household income qualifies. The application of an LIDR to a customer’s bill will also reduce the value of the onsite usage the residential customer is offsetting with solar. The application of discounts can result in not just a lessening of the actual savings experienced by the customer, but some solar offers that comply with the ILSFA savings requirements may actually cost the customer more out-of-pocket than if they didn’t have solar at all, and only the LIDR was applied to their electric bill. The threshold where solar becomes costlier than not depends on multiple factors, including the customer’s individual LIDR rate and the percentage of usage they are offsetting.

The IPA and Program Administrator believe that since a customer’s individual discount rate can change from year to year, there is not an administratively reasonable way to predict and ensure ILSFA participation results in ongoing lower out-of-pocket costs for residents with a LIDR. Accordingly, the Program believes that no-cost offers provide the surest and simplest assurance of ongoing benefits. With the 2026-2027 Program Year, ILSFA will be prioritizing projects offering no-cost offers through existing selection mechanisms and will be introducing an additional review of Residential Solar (Small) projects that include customer costs. This review will model the economic benefits to the customer of the LIDR alone, and the LIDR plus the relevant solar offer. The offer will be required to provide economic benefit to the customer when accounting for the LIDR. Approved Vendors will be able to work with their Approved Vendor Managers before a project is submitted to check that the offer not only meets the savings requirements outlined in Section 5, but that the offer with the LIDR is also not a greater out-of-pocket cost than the customer only having their LIDR applied to their energy bill. Systems with no-cost offers to the customer will not need this additional check. See Chapter 5 for further details. Additionally, Community Solar projects that commit to providing no-cost subscriptions to participants will be prioritized for selection under the Project Selection Protocol.

The IPA and Program Administrator are monitoring the rollouts of the electricity LIDRs and considering how to further move ILSFA toward offering income-eligible residents no-cost systems and Community Solar subscriptions that ensure savings.

More information about the Illinois Low-Income Discount Rates is available on the [Citizens Utility Board website](#). Because all ILSFA households meet the income eligibility criteria for the LIDRs, ILSFA Approved Vendors working in the Residential Solar (Small) and Community Solar sub-programs should be familiar with any LIDR offered by the customer’s electric utility.

## 1.4. Appeal Process

An Approved Vendor/Designee or potential Approved Vendor/Designee can appeal any and all determinations made by the Program Administrator to the IPA, including but not limited to rejection of the Approved Vendor/Designee application, decisions related to consumer protection, and determinations on project applications. While the Program Administrator is an extension of the IPA and works in lockstep with the Agency, the Agency offers this route to Program participants as a matter of course. Unless otherwise specified by the Program Administrator, the deadline to submit an appeal is two weeks after the decision that is being appealed.

To initiate the appeal process, the Approved Vendor/Designee or potential Approved Vendor/Designee must promptly submit a written appeal to the IPA. The appeal must be submitted through email to [IPA.ILSFA@illinois.gov](mailto:IPA.ILSFA@illinois.gov). This appeal should be presented on the company's letterhead and include a comprehensive rationale explaining why the Program Administrator's determination is believed to be in error. In conjunction with the written request, the Approved Vendor/Designee or potential Approved Vendor/Designee shall provide any supporting information, documents, or communications that reinforce their appeal. The IPA may request additional materials and information during the review process and reserves the right to schedule a call or informal discussion with the affected entity to learn more about the basis for its position.

The IPA is committed to issuing final determinations on eligibility expeditiously after receiving the appeal and reviewing relevant information. As the final authority in the appeal process, the IPA will provide a supporting rationale for its decision.

This appeals process ensures a fair and thorough review of Program Administrator determinations, with the IPA serving as the ultimate authority in the decision-making process.

## 2. Sub-Programs Overview

ILSFA incentives are allocated through four sub-programs: Illinois Solar for All: Residential Solar (Small), Illinois Solar for All: Non-Profit and Public Facilities, Illinois Solar for All: Community Solar, and Illinois Solar for All: Residential Solar (Large). This Manual provides guidance for Approved Vendors to participate in all sub-programs.

Historically, ILSFA sub-programs have required that participants see a minimum specified savings, where ongoing costs or fees to the participant do not exceed 50% of the value of energy produced by their PV system or, in the case of Community Solar, their share of the installed PV system (see Section 5 on Participant Savings Requirements of this Manual for more details). The introduction of the low-income discount rates for income-eligible residents, which vary by customer and potentially by year, means that the actual out-of-pocket savings seen by a customer is difficult to predict. For the 2026-2027 Program Year, ILSFA will continue to calculate the required savings based on the existing formula, but messaging about anticipated savings will inform that a household's low-income discount reduces the value of the electricity generated by their onsite system or credits from their Community Solar subscription.<sup>14</sup> The Residential Solar (Small) sub-program requires that eligible households in one- to four-unit buildings incur no upfront costs (defined as any costs paid before project Energization). Each sub-program includes important consumer protections. Program participants are allowed to incur upfront costs in the Community Solar and Residential Solar (Large) sub-programs only in specific circumstances detailed in Sections 2.3 and 2.4, respectively.

REC price schedules for each sub-program appear in the following tables, which are organized by system size and utility groups. Group A includes projects located in the service territories of Ameren Illinois, MidAmerican Energy, Mt. Carmel Public Utility, and rural electric cooperatives and municipal utilities located in Midcontinent Independent System Operator ("MISO"). Group B is comprised of projects located in the service territories of ComEd and rural electric cooperatives and municipal utilities located in Pennsylvania-New Jersey-Maryland Interconnection ("PJM"). Across all incentive programs, the system sizes are measured in maximum continuous AC

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<sup>14</sup> Changes to the value of the energy generated caused by layering of Low-Income Discount Rates with solar generation are detailed further in Chapter 5.

as measured at the inverter. Qualified and approved participating projects receive a set payment in exchange for all RECs generated over their first 15 years of operation, paid upfront upon verification of Energization via Part II Approval of a project.<sup>15</sup> These payments are made through contracts between Approved Vendors and either the IPA for RERF-funded REC purchases or Illinois electric utilities for utility-funded REC purchases. REC prices were updated in the 2026 Long-Term Plan, and RECs generated over the contract term can be estimated by using the [Calculating REC Quantities and Capacity Factors](#) ILSFA program document. REC prices will be announced on the ILSFA website before the 2026-2027 Program Year, although sub-program budgets will not be published until a final amount of available RERF funds for ILSFA incentives can be established, which will be closer to the opening of the first submission window.

## 2.1. Illinois Solar for All: Residential Solar (Small) Sub-Program

Residential Solar (Small) sub-program projects are Distributed Generation (DG) projects installed onsite (in one- to four-unit buildings), typically behind a participant’s meter, and used primarily to offset a single participant’s load. The Residential Solar (Small) sub-program incentive is intended to provide funding for PV projects located on residential properties where, if serving a building with multiple units, 50% or more of the building’s households are income eligible. See section 6.1 of this Manual, Project and Participant Eligibility, for more details.

The IPA and the Program Administrator have worked with stakeholders to identify barriers to participation in this sub-program and continue to explore and implement adjustments to increase participation, lower soft costs, and simplify participant acquisition procedures.

**TABLE 2.1. 2026-2027 PROGRAM YEAR INCENTIVES FOR 1- TO 4-UNIT BUILDINGS MARKET SEGMENT (\$/REC)**

System Size	Group A	Group B
≤ 10 kW	\$194.82	\$185.02
> 10 - 25 kW	\$164.39	\$163.75
> 25 - 100 kW	\$132.30	\$137.93

### 2.1.1 ENERGY SOVEREIGNTY

Within the Residential Solar (Small) sub-program, 25% of incentives are reserved for Energy Sovereignty projects until January 1, 2027.<sup>16</sup> Residential Solar projects can achieve Energy Sovereignty through a no-cost purchase agreement, a lease, or PPA with an early ownership transfer seven years or earlier after Energization. The contract

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<sup>15</sup> The exceptions to the rule of all RECs generated being delivered and compensated are generally as follows: In any given year of the 15-year contract, any unsubscribed share of a Community Solar project would not receive payment for its RECs. Additionally, RECs associated with the unsubscribed share as of one year after Energization would not be required to be delivered throughout the 15 years. Additionally, any subscribed share of a Community Solar project that has a non-income-eligible subscriber other than the project’s anchor tenant would not receive payment or have a delivery obligation for the associated RECs.

<sup>16</sup> See Section 8.5.1 of the 2026 Long-Term Plan and the [Project Selection Protocol Guidance](#) for the 2026-2027 Program Year.

between the participant and the system owner should define the terms of the early ownership transfer, as ILSFA REC payments are paid upfront, removing the option of withholding payments to ensure the ownership transfer occurs as planned.

All ILSFA participant contracts for onsite systems are required to provide a full system warranty, guarantee, or other agreement that ensures the operation of the entire system to industry standards for at least 15 years or the length of the REC contract (whichever is longer) at no additional cost to participants. Further details related to this requirement can be found in the [Residential Solar and Non-Profit and Public Facilities Contract Requirements](#).

Participant contracts for projects that are applying to receive Energy Sovereignty adders must also ensure ownership of RECs will continue to transfer to the Approved Vendor for the full 15-year duration of the REC contract. Finally, contracts qualifying for the Energy Sovereignty adder must specify the cost and timing of the transfer of ownership and any ongoing costs (apart from Operations and Maintenance, which the Approved Vendor is responsible for, per the [Residential Solar and Non-Profit and Public Facilities Contract Requirements](#)) the new owner may expect once they acquire ownership of the system.

Notification of transfer of ownership shall be provided to either the Agency or a utility company that is party to the REC contract (both referred to herein as “Buyer” or “Buyers”) and the Program Administrator by the Approved Vendor, along with documentation of how the transfer meets the terms of the contract, within 30 days of the transfer. To facilitate the collection and review of this documentation, the Program Administrator created the Acknowledgement of Energy Sovereignty Transfer form and Energy Sovereignty Transfer FAQ document, which are available in the [Approved Vendor Portal](#). Approved Vendors that are parties to a REC contract with a Buyer are responsible for completing, obtaining all required signatures, and submitting the Acknowledgement of Energy Sovereignty Transfer form to the Program Administrator upon completion of an Energy Sovereignty transfer. This notification must be made for transactions involving ownership that are transferred from the outset, such as a no-cost purchase agreement, and transactions involving a later transfer, such as a lease or PPA with a qualifying early transfer of ownership.

If the Energy Sovereignty transfer does not happen within two years after the Energy Sovereignty Proposed Transfer Date, the Designated System shall be removed from the applicable REC contract in accordance with Section 2.7(c) of the REC contract. Upon the removal of the Designated System, Buyer shall be entitled to payment by the Approved Vendor (as the Seller) in the amount of the sum of: (i) the Collateral Requirement calculated at the time of the Trade Date with respect to such Designated System; and (ii) one hundred percent (100%) of the total payments Seller has received from Buyer associated with RECs from such Designated System.

To encourage Energy Sovereignty, an additional \$10 per REC is applied to the project’s REC value for RECs anticipated to be delivered after the transfer of ownership is completed for projects that facilitate ownership by the participant in a manner consistent with the requirements herein.

## 2.1.2 HOME REPAIRS AND UPGRADES PILOT

The need for home repairs and electrical upgrades has proven to be a barrier for prospective participants who are otherwise eligible for the Residential Solar (Small) sub-program. Since income-eligible residents are more likely to face this obstacle to participation, the Home Repairs and Upgrades Pilot, initially outlined in the 2022 Long-Term Plan, provides additional incentives to Approved Vendors who complete the home repairs and upgrades necessary for solar installation on owner-occupied income-eligible homes. The Program Administrator first seeks to connect income-eligible homes with federal, state, or non-profit programs that fund home repairs. It has compiled a list of available external funding opportunities in the [External Funding List](#) and includes relevant information on available funding amounts, eligibility requirements, waitlists, contact information, and more. The Program Administrator is available as needed to assist participants in communicating with external home repair programs and in preparing

paperwork and documentation. The Program Administrator is tracking the ability of these external programs to help fund the needed home repairs and upgrades within ILSFA.

The primary goal of this Pilot is to improve participation in the Residential Solar (Small) sub-program, while also gathering information from Approved Vendors on the frequency and extent of repair needs in income-eligible homes planning to install solar panels. The Program Administrator is tracking this information and will include it in a final report of the Pilot, following each Program Year of operation. Due to an increase in project applications to the Home Repairs and Upgrades Pilot initiative and resulting mitigation of participation barriers for Residential Solar, the IPA has decided to extend the Home Repairs and Upgrades Pilot until the Illinois Climate Bank grant program begins operation. As explained in Section 8.8.4 of the 2026 Long-Term Plan, the Illinois Climate Bank was awarded \$156 million through the U.S. Environmental Protection Agency Greenhouse Gas Reduction Fund (“GGRF”) Solar for All Program. Some of this funding was intended for grants for site suitability upgrades, addressing the same barriers to solar accessibility as the Home Repairs and Upgrades Pilot. On August 7, 2025, the Illinois Finance Authority received a notice that the GGRF award had been terminated by the U.S. EPA. On October 16, 2025, the State of Illinois, along with other grant recipient states, filed suits against the U.S. EPA challenging the grant termination. The Agency will monitor this litigation and will continue the Home Repairs and Upgrades pilot in the meantime. Proposed updates to the design of the Pilot will be released and available for stakeholder feedback in May 2026.

## 2.2. Illinois Solar for All: Non-Profit and Public Facilities Sub-Program

The Non-Profit and Public Facilities projects are installed onsite, behind a participant’s meter, and used primarily to offset a single participant’s load. The Non-Profit and Public Facilities incentive is intended to provide funding for PV projects serving non-profit or public facilities that provide critical services to Environmental Justice and Income-Eligible Communities.

Previously, Non-Profit and Public Facilities projects were required to be located within Income-Eligible Communities (IECs) or Environmental Justice Communities (EJCs). Beginning in the 2026-2027 Program Year, census blocks adjacent to Environmental Justice Communities or Income-Eligible Communities will be eligible to participate in the Non-Profit and Public Facilities sub-program.<sup>17</sup> An adjacent census block is defined as a neighboring statistical geographic area that shares a common boundary with a census tract, which is, at that point in time, designated as an Environmental Justice Community or an Income-Eligible Community. Non-Profit and Public Facilities projects must demonstrate both of the following conditions:

1. A sufficient connection to, and input from members of the IEC or EJC the facility serves and/or the non-profit or public facility on which the project would be sited, evidenced by:
  - A narrative summary by the proposed entity that demonstrates that the Non-Profit and Public Facility actively engages with and impactfully serves a local Income-Eligible or Environmental Justice Community
  - Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of their work in a local Income-Eligible or Environmental Justice Community

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<sup>17</sup> Projects in adjacent census blocks will be eligible to participate in the Non-Profit and Public Facilities sub-program but will not satisfy the environmental justice carveout nor receive additional points in project selection.

2. The property is occupied by a Critical Service Provider (“CSP”) for the community (e.g., youth centers, hospitals, homeless shelters, senior centers, community centers, places of worship, and affordable housing providers, including public housing sites). For a public facility, the building must host a department/agency that is a CSP meeting this standard. Section 4.4 of this Manual includes a list of qualified CSPs.

As of the 2023-2024 Program Year, the Non-Profit and Public Facilities sub-program does not include public schools (which includes charter schools, as covered by the Illinois School Code) due to the addition of a dedicated Illinois Shines block for public schools. Schools that are not covered by the Illinois School Code may be considered in the Non-Profit and Public Facilities sub-program. Additionally, the sub-program disallowed distributed generation projects serving multifamily residential facilities from participating in the Non-Profit and Public Facilities sub-program since these projects qualify to apply for the Residential Solar (Large) sub-program. Section 1-56(b)(2)(C) of the IPA Act under CRGA introduced new permissive language on eligibility in the Non-Profit and Public Facilities sub-program. Under the changes brought on by CRGA, nonprofits and public facilities that can demonstrate they serve Income-Eligible or Environmental Justice Communities “may potentially qualify for the program, regardless of physical location.” Additional changes to Section 1-56(b)(2)(C) of the IPA Act under CRGA explain how qualification of such non-profits and public facilities may be determined. Similarly, changes in law provide that master-metered multifamily buildings that primarily house income-eligible residents “may qualify” for the sub-program. The Agency will develop eligibility criteria and solicit stakeholder feedback on the proposals, including on the timing of implementation of these proposals, for potential inclusion in a future Long-Term Plan.

### **2.2.1 ENERGY SOVEREIGNTY**

The Non-Profit and Public Facilities sub-program reserves 25% of incentives for Energy Sovereignty projects until January 1 of a Program Year, with the Project Selection Protocol giving preference to projects that facilitate Energy Sovereignty.<sup>18</sup> Non-Profit or Public Facilities projects can achieve Energy Sovereignty through a purchase agreement or a lease or PPA with an early transfer of ownership seven years or earlier after Energization. The contract between the participant and the system owner should define the terms of the early transfer of ownership, as ILSFA REC payments are paid upfront, removing the option of withholding payments to ensure the ownership transfer occurs as planned.

All ILSFA participant contracts for onsite systems are required to provide a full system warranty, guarantee, or other agreement that ensures operation of the entire system to industry standards for at least 15 years or the length of the REC contract (whichever is longer), at no additional cost to participants. Additional details related to this requirement can be found in the Residential Solar and Non-Profit and Public Facilities Contract Requirements. Participant contracts for projects that are applying to receive Energy Sovereignty adders must also ensure ownership of RECs will continue to transfer to the Approved Vendor for the full 15-year duration of the REC contract. Finally, contracts qualifying for the Energy Sovereignty adder must specify the cost and timing of the transfer of ownership and any ongoing costs (apart from Operations and Maintenance, which the Approved Vendor is responsible for, per the Residential Solar and Non-Profit and Public Facilities Contract Requirements) the new owner may expect once they acquire ownership of the system. Approved Vendors are encouraged to work with the new owner to ensure they obtain insurance for the system.

The Approved Vendor shall provide the Buyer and the Program Administrator with notification of the transfer of ownership, along with documentation demonstrating that the transfer meets the terms of the contract, within 30 days of the transfer. To facilitate the collection and review of this documentation, the Program Administrator created the Acknowledgement of Energy Sovereignty Transfer form and Energy Sovereignty Transfer FAQ

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<sup>18</sup> See Section 8.5.1 of the 2026 Long-Term Plan and the [Project Selection Protocol Guidance](#) for the 2025-2026 Program Year.

document, which are available in the Operational Resources section of the [Approved Vendor Portal](#). Approved Vendors are responsible for completing, obtaining all required signatures, and submitting the Acknowledgement of Energy Sovereignty Transfer form to the Program Administrator upon completion of an Energy Sovereignty transfer. This notification must be made for transactions involving ownership that are transferred from the outset, such as a purchase agreement, and transactions involving a later transfer, such as a lease or PPA with a qualifying early transfer of ownership.

If the Energy Sovereignty transfer does not occur within two years after the Energy Sovereignty Proposed Transfer Date, the Designated System shall be removed from the applicable REC contract in accordance with Section 2.7(c) of the REC contract. Upon the removal of the Designated System, Buyer shall be entitled to payment by the Approved Vendor (as the Seller) in the amount of the sum of: (i) the Collateral Requirement calculated at the time of the Trade Date with respect to such Designated System; and (ii) one hundred percent (100%) of the total payments Seller has received from Buyer associated with RECs from such Designated System.

**TABLE 2.2. 2026-2027 PROGRAM YEAR INCENTIVES FOR NON-PROFITS AND PUBLIC FACILITIES (\$/REC)**

System Size	Group A	Group B
≤ 25 kW	\$114.41	\$141.11
>25 - 100 kW	\$115.85	\$137.87
>100 - 200 kW	\$110.65	\$128.66
>200 - 500 kW	\$99.76	\$117.54
>500 - 2000 kW	\$96.09	\$110.76
>2000 - 5000 kW	\$87.54	\$101.33

To encourage Energy Sovereignty, an additional \$10 per REC is applied to the project’s REC value for RECs anticipated to be delivered after the transfer of ownership is completed for projects that facilitate ownership by the participant in a manner consistent with the requirements herein.

### 2.3. Illinois Solar for All: Community Solar Sub-Program

Community Solar projects are installed on rooftops or ground-mounted and are interconnected directly to the utility’s distribution system. Illinois Solar for All: Community Solar projects are installed anywhere within a utility service territory, and residents can subscribe based on who lives within that utility service territory. ILSFA Community Solar incentives are intended to provide funding for Community Solar projects designed to serve income-eligible households. For more details, see Section 5.2 of this Manual, Project and Participant Eligibility.

Except as noted in this paragraph, subscribers to an ILSFA Community Solar project must be income-eligible residential households with a utility account, and RECs produced from the corresponding subscription shares will receive the Community Solar prices shown below. No subscriber may have greater than a 40% share of the system capacity. An ILSFA Community Solar project may have only one anchor tenant that is not an income-eligible residential household, and such an anchor tenant must be identified at the time of project application. An anchor

tenant may be any rate-paying<sup>19</sup> non-income-eligible residential household, master-metered residential property, business, non-profit organization, or public entity. RECs produced from an anchor tenant's share of the project will be paid based on currently applicable Illinois Shines Community Driven Community Solar prices, except for an income-eligible master-metered residential building acting as an anchor tenant, in which case RECs produced from the property's share of the project will be paid based on an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price.<sup>20</sup> Outside of the anchor tenant, any subscription share that is not subscribed to by an income-eligible residential household will not receive payments, nor will the Approved Vendor be required to deliver those RECs through the ILSFA REC contract. The first annual report for each project (submitted one year after the time of Energization) must identify at least 50% of proposed income-eligible household subscribers (in kW volume) for the project to receive payment under the contract. See the REC contract for specific requirements and remedies.

Approved Vendors and Designees must be familiar with net metering and Community Solar bill crediting rules and requirements in the electric utility service territories in which they make offers, and marketing statements and any savings claims or estimates must be consistent with how net metering and Community Solar bill crediting apply in those utility service territories.

Under Section 16-107.5(l)(4) of the Public Utilities Act, most Community Solar projects in Illinois can now request that a utility "include a subscriber's subscription fee on the subscriber's monthly electric bill and provide the subscriber with a net credit equivalent to the total bill credit value for that generation period minus the subscription fee, provided the subscription fee is structured as a fixed percentage of bill credit value." With this net crediting approach, both the cost and value of the Community Solar subscription will appear on a single utility bill, helping reduce confusion. The Agency will require future applicants to this sub-program to use single-bill net crediting once it is available from the utility. Thus, ILSFA Community Solar projects approved in the 2023-2024 Program Year and beyond will be required to utilize a single-billing option.<sup>21</sup> To simplify the billing process and improve the resident participant experience, ILSFA Community Solar projects approved prior to the 2023-2024 Program Year are strongly encouraged to also utilize the utility single-billing option.

A collateral of 5% of the total remaining project REC value must be maintained for 10 years. Approved Vendors must submit annual reports to verify new subscriber income and income-eligible share; if the original levels at the time of Energization are not maintained in any given delivery year, then the collateral may be called upon to claw

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<sup>19</sup> In the 2023-2024 Program Year, affordable housing buildings with subscriptions under 25 kW were allowed to qualify as income-eligible subscribers and receive the commensurate residential subscriber REC value, as long as the property owner demonstrated that the required savings value is passed on to tenants. With the 2024 Long-Term Plan, this was reversed with a determination that only subscriptions of income-eligible residents responsible for their own energy burden may be considered for the ILSFA Community Solar REC value. Master-metered buildings may no longer count as income-eligible non-anchor tenant subscribers to ILSFA Community Solar projects.

<sup>20</sup> Note that in the first two Program Years, non-profit and public sector anchors could receive REC payments at the ILSFA LICs price. Regardless of a project's Energization date, invoices are generated based on the REC prices listed in the contract.

<sup>21</sup> In the 2024 Long-Term Plan, the Agency committed to monitoring for impacts in ILSFA Community Solar interest as a result of requiring use of utility single-billing options. With the 2026 Long-Term Plan, the Agency has proposed continuing to require ILSFA Community Solar projects to utilize available utility single-billing options, and the utility requirement for this option is that the fee must be a percent of billing credit, which leads to the percent of utility bill credit being the only subscription model that is usable.

back the incentives to reflect the actual income-eligible subscription level achieved in that delivery year. Approved Vendors who satisfy the definition of a small and emerging business and are designated as such in the Illinois Shines program (see Section 3.3.1) may deduct the 5% collateral requirement from the REC payment rather than having it due after contract execution, with a five-project cap per Approved Vendor.

Income-eligible, master metered residential housing entities are eligible to subscribe as anchor tenants of an ILSFA Community Solar project where the building owner/manager commits to passing along the value of at least 50% of the energy savings to tenants in tangible ways, with a REC price for that portion of the system being the average of the ILSFA Community Solar and corresponding Illinois Shines Community Driven Community Solar REC price. Because the net metering bill credit for such subscribers will be the utility Price to Compare (“PTC”), costs/savings will be based on that net metering value. Options for passing benefits to residents include:

- Reduced (or not raised) rents
- New staff that serves all tenants
- Facility upgrades (beyond repairs and renovations necessary to maintain building codes or organization certifications)
- New equipment that serves all tenants
- Other payments, benefits, or services to all tenants that would not otherwise have been possible without the savings generated by the photovoltaic system

These benefits must be available to all the tenants, regardless of income level or individual participant uptake. Additionally, the building owner/manager must communicate those benefits to all residents and how they resulted from the installation of solar.

The Approved Vendor should consult with their Approved Vendor Manager to ensure that the provision of tangible benefits is verifiable and easily managed. The proposed tangible benefits should be quantifiable and verified through supporting documentation such as dated and paid invoices/bills that tie back to leases, scopes of work, services, or goods that comprise the tangible benefits provided to tenants. The Approved Vendor must submit a tangible benefit plan along with their request for recipient validation with the initial project submission, demonstrating the building owner/manager’s commitment to pass along the full value of the required savings to residents and describing in detail how this will be accomplished.

**TABLE 2.3. 2026-2027 PROGRAM YEAR INCENTIVES FOR ILSFA COMMUNITY SOLAR PROJECTS (\$/REC)**

System Size	Group A	Group B
≤25 kW	\$109.91	\$122.97
>25 - 100 kW	\$111.35	\$124.31
>100 - 200 kW	\$107.74	\$121.24
>200 - 500 kW	\$97.55	\$112.62
>500 - 2000 kW	\$87.75	\$97.96
>2000 - 10000 kW	\$78.04	\$82.44

### 2.3.1 NCSP+ ENERGY CONNECTOR AND LIHEAP REFERRAL PROCESS

As mentioned in Section 1.3.4, the IPA partnered with DCEO's Office of Community Assistance to pilot the NCSP+ [Energy Connector](#) platform, which will assist with connecting Illinois LIHEAP recipients with Community Solar opportunities in ILSFA that provide significant savings.<sup>22</sup>

In December 2025, NLR announced to partnering states on the Connector that the platform would transition from NLR to a new long-term host by March 31, 2026. While ILSFA's partnership with NCSP+ on the Connector has been both beneficial and instrumental in fostering meaningful collaborations, the Program has decided to transition off the Connector and focus on creating a similar LIHEAP referral process within Program processes that will continue to facilitate connecting eligible LIHEAP customers with ILSFA Community Solar projects, with the goal of adding a referral pipeline for Residential Solar (Small) in the future.

Similar to the previous process, the Program will continue to streamline enrollment of LIHEAP recipients to ILSFA Community Solar subscriptions with the following process:

- Subscription Manager informs the Program of their ILSFA Community Solar project, including subscription availability and savings.
- The Program reviews project information and ensures they follow ILSFA Community Solar project requirements and agree to provide the Program with project and enrollment updates.
- Local LIHEAP Administrators educate households on Community Solar, identifying and collecting interested households' information to share with the Program.
- Basic household information is shared with a Subscription Manager based on project availability.
- Subscription Managers complete enrollment and update the Program on the households' enrollment status.

According to the 2022 Long-Term Plan, and as outlined above in Section 2.3, ILSFA Community Solar projects approved in the 2023-2024 Program Year and beyond will be required to utilize a single-billing option offered by utilities, so the customer subscription charges are billed through the customer's utility account. This requirement expands to all Community Solar projects wishing to participate in the LIHEAP referral process, even if approved in prior Program Years. Approved Vendors seeking to list their projects to be connected to LIHEAP households through this process must utilize a utility's single-billing option, as only projects that have this feature will be offered to LIHEAP households.

The Program will continue to explore additional pathways to increase ILSFA participation and streamline enrollment of LIHEAP households. One such pathway for LIHEAP households will be through an expanded Participant Referral process, which will be developed with stakeholder input through a separate feedback process and detailed further in Section 4.5.

For further details on the Connector, please visit the [Clean Energy Connector page](#). To inquire about participation and requirements, Approved Vendors are encouraged to contact [vendors@illinoisSFA.com](mailto:vendors@illinoisSFA.com).

### 2.3.2 COMMUNITY SOLAR SUBSCRIBER MANAGEMENT

The Program Administrator will work with Approved Vendors to ensure interested participants are not waiting for extended periods before being assigned an ILSFA Community Solar subscription. The Program Administrator will

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<sup>22</sup> Additional information may be found on the Department of Energy's website about the [Community Solar Subscription Tool](#).

also work with Approved Vendors on an appropriate timeline for subscriber acquisition to avoid signing up eligible subscribers too far in advance of a project's ability to begin delivering credits to the participant, which can lead to confusion and frustration.

If an ILSFA Community Solar project is full, Approved Vendors may generate a waitlist of interested prospective participants. However, Approved Vendors should not collect certain types of information, including payment information or signed contracts, that commit a participant to a project if the designated project is full and the participant will be placed on a waitlist. Approved Vendors must contact the next participant on the waitlist when there is space available to complete sign-up documentation to subscribe to a project with available capacity that matches the participant's capacity needs. Potential participants who sign up for a waitlist should receive updates on the waitlist at specified intervals and at least every two months. Finally, prospective participants can remove their names from the waitlist at any time using an easy process and without any financial consequences or other consequences.

Similarly, an Approved Vendor or Designee may select a "To Be Determined" option in the Disclosure Form for a Community Solar offer when the terms of the subscription are set but the specific project for the subscription has not been determined. Each "To Be Determined" Disclosure Form must list a portfolio of between two and five Community Solar projects to which the "To Be Determined" subscriber will ultimately be assigned. The Disclosure Form must also list the location of each project in the portfolio. Each portfolio may only include Community Solar projects owned by the same Approved Vendor or separate Single Project Approved Vendors under a common parent company. Approved Vendors and Designees may use different portfolios of projects for different customers as long as the other requirements are met. An Approved Vendor must assign "To Be Determined" subscribers to a specific Community Solar project within the portfolio listed on the customer's Disclosure Form within 180 days of the date that the customer signed the Disclosure Form with an option for a 30-day extension of this deadline. The Approved Vendor or Designee must provide an update to "To Be Determined" subscribers on their subscription status every 30 days until the subscriber is assigned to a specific project. When the subscriber is assigned to a specific project, they must be notified no later than 14 days later with the following details:

- Project location, including the county in which the project is located;
- Project name (as that project's name appears in the ILSFA portal); and
- Project ILSFA identification number.

If the customer elects to cancel their subscription contract, the Approved Vendor or Designee must provide the customer with a document maintained by the Program Administrator containing relevant ILSFA Community Solar offers by other Approved Vendors if an offer to which the customer could subscribe is currently available. Please see the [Consumer Protection Handbook](#) for additional information.

Please see Chapter 7 for marketing requirements for Approved Vendors managing ILSFA Community Solar subscriptions.

### **2.3.3 ENERGY SOVEREIGNTY**

The Community Solar sub-program reserves 25% of incentives for Energy Sovereignty projects until January 1, 2027,<sup>23</sup> with the Project Selection Protocol giving preference to projects that facilitate Energy Sovereignty. Projects within the Community Solar sub-program can qualify for Energy Sovereignty designation through ownership by

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<sup>23</sup> See Section 8.5.1 of the 2026 Long-Term Plan.

income-eligible households, affordable housing owners, or non-profits,<sup>24</sup> or by a cooperative model in which at least 50% of the energy produced is proposed to be subscribed to by participant-owners with ownership shares at the time of Part I application. Ownership by an eligible participant may be achieved by a lease or PPA with an early transfer of ownership clause that is triggered at seven years after Energization, or earlier, to give the participant ownership of panels equivalent to their subscription or a direct purchase of the system by the eligible participant before Energization.

The cooperative model allows a co-op organization<sup>25</sup> to sell subscriptions to participant-owners of the co-op, with the participant-owner receiving a low-cost subscription and an ownership share. Subscription payments are considered payments for ownership shares in a Community Solar cooperative on behalf of eligible participants. These shares entitle the participant-owner to receive dividends and to subscribe to electricity from the project at a discounted rate, sufficient to meet bill savings requirements. The participant-owner can sell the shares to other co-op members or to the co-op itself. A system owner may also transfer ownership to an eligible participant after tax benefits have been fully captured, such as through an early transfer of ownership of a lease or PPA. Community Solar projects organized as cooperatives to promote Energy Sovereignty are one of the exceptions to ILSFA's requirement of no upfront costs and may charge a nominal fee to participant-owners. Estimated net costs to the customer may not exceed 50% of the value of the energy generated by the participant's share of the PV system (not including the impacts of the LIDR).

Any ownership model used for an Energy Sovereignty project must still be compatible with the ILSFA REC delivery contract of 15 years, with payment upon Energization of a solar project, providing an up-front incentive.

The Approved Vendor shall notify the Buyer and the Program Administrator of the transfer of ownership and provide documentation of how the transfer meets the terms of the contract within 30 days of the transfer. No current forms have been established to facilitate the collection of this documentation; Approved Vendors should notify the Program Administrator to coordinate this review.

If the transfer does not happen within two years after the Energy Sovereignty Proposed Transfer Date, the Designated System shall be removed from the applicable REC contract in accordance with Section 2.7(c) of the REC contract. Upon the removal of the Designated System, Buyer shall be entitled to payment by the Approved Vendor (as the Seller) in the amount of the sum of: (i) the Collateral Requirement calculated at the time of the Trade Date with respect to such Designated System; and (ii) one hundred percent (100%) of the total payments Seller has received from Buyer associated with RECs from such Designated System.

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<sup>24</sup> 20 ILCS 3855/1-56(b)(2)(A)(i) requires the Agency to reserve "a portion" of Illinois Solar for All funding "for projects that promote energy sovereignty through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households."

<sup>25</sup> References to a cooperative model throughout the Vendor Manual mean a cooperative as structured in compliance with Illinois Co-operative Act (805 ILCS 310/) and is not meant to refer to an "Electric Cooperative" which is subject to the Electric Suppliers Act, enacted by the 74th General Assembly, and has the same meaning as is defined in Section 3.4 of that Act (220 ILCS 5/3-119).

For further information and examples of community solar ownership models seen in other states, see Appendix G: Review of Approaches to Energy Sovereignty<sup>26</sup> of the 2024 Long-Term Plan.

## 2.4 Illinois Solar for All: Residential Solar (Large) Sub-Program

The Climate and Equitable Jobs Act separated the Residential Solar sub-program, previously known as the Low-Income Distributed Generation sub-program, into two sub-programs: one for single-family and one- to four-unit building projects (Small), and one for five or more-unit projects (Large).

As with the Residential Solar (Small) sub-program, Residential Solar (Large) projects must meet the requirements of the Illinois Shines program and income-eligible consumer protections. The Residential Solar (Large) sub-program reserves 25% of available funding for projects located in EJs for the entire Program Year and 25% for Energy Sovereignty projects until January 1, 2027.<sup>27</sup>

Despite being separate sub-programs, the IPA Act provides a single budget allocation for both the Residential Solar (Small) sub-program and the Residential Solar (Large) sub-program. The 2026 Long-Term Plan allocates funding evenly between the two sub-programs until January 1 of the Program Year.

If, on January 1 of the Program Year, funds remain in the Residential Solar (Large) sub-program, those would be released for projects of any size from either sub-program (Small and Large). Any remaining funds in the EJC carveouts of either sub-program would be maintained in each sub-program through the end of the Program Year and would not be combined.

For residential buildings five units and larger, either at least 50% of the units must be verified income-eligible, or the building must meet the definition of “affordable housing” contained in the Illinois Affordable Housing Act. Subscriptions for homes or buildings that qualify for U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers or Project-Based Rental Assistance (which are programs for housing units dedicated to income-eligible tenants) also qualify. The income qualification levels required for participation in these programs are lower than the income requirements for ILSFA.

One of the exceptions to the 2026 Long-Term Plan’s no upfront costs standard is for Residential Solar (Large) projects (multifamily projects of five or more units), where the participant purchases the system. In this case, the residential participant’s first-year savings may be less than 50% so long as the calculation of that participant’s expected ongoing savings demonstrates that this requirement would be met through overall savings applied across the full 15 years of the REC Delivery Contract. Further, the building owner is prohibited from passing upfront costs to the building residents.<sup>28</sup>

**TABLE 2.4. 2026-2027 PROGRAM YEAR INCENTIVES FOR 5+ UNIT BUILDINGS MARKET SEGMENT (\$/REC)**

System Size	Group A	Group B
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<sup>26</sup> [Appendix G: Review of Approaches to Energy Sovereignty](#)

<sup>27</sup> See Section 8.5.1 of the 2026 Long-Term Plan.

<sup>28</sup> See Section 8.2.2 of the 2026 Long-Term Plan.

≤ 10 kW	\$131.30	\$146.88
> 10 - 25 kW	\$106.30	\$124.47
> 25 - 100 kW	\$82.91	\$100.52
> 100 - 200 kW	\$79.28	\$94.06
> 200 - 500 kW	\$70.70	\$85.00
> 500 - 2000 kW	\$67.67	\$79.71
> 2000 - 5000 kW	\$61.00	\$72.53

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.

### 2.4.1 ENERGY SOVEREIGNTY

The Residential Solar (Large) sub-program reserves 25% of incentives for projects that facilitate Energy Sovereignty until January 1, 2027, with the Project Selection Protocol giving preference to projects that lead to participant ownership.

Residential Solar (Large) projects can facilitate Energy Sovereignty through a purchase agreement (subject to applicable limits on upfront costs) or a lease or PPA with an early transfer of ownership seven years or earlier after Energization. The contract between the participant and the system owner should define how and when the transfer of ownership will happen.

All ILSFA participant contracts for onsite systems are required to provide a full system warranty, as well as Operations and Maintenance guarantees for the full 15-year duration of the REC contract at no additional cost to participants. Participant contracts for projects that are applying to receive Energy Sovereignty adders must also ensure ownership of RECs will continue to transfer to the Approved Vendor for the full 15-year duration of the REC contract. Finally, contracts qualifying for the Energy Sovereignty adder must specify the cost and timing of the transfer of ownership and any ongoing costs the buyer may expect once they acquire ownership of the system. Approved Vendors are encouraged to work with the new owner to ensure they obtain insurance for the system.

Notification of the transfer of ownership shall be provided to the Buyer and the Program Administrator by the Approved Vendor, along with documentation of how the transfer meets the terms of the contract, within 30 days of the transfer. To facilitate the collection and review of this documentation, the Program Administrator created the Acknowledgement of Energy Sovereignty Transfer form and Energy Sovereignty Transfer FAQ document, which are available in the Operational Resources section of the Approved Vendor Portal. Approved Vendors that are parties to a REC contract with a Buyer are responsible for completing, obtaining all required signatures, and submitting this Acknowledgement of Energy Sovereignty Transfer form to the Program Administrator upon completion of an Energy Sovereignty transfer. This notification must be made for transactions involving ownership that are transferred from the outset, such as a purchase agreement, and transactions involving a later transfer, such as a lease or PPA with a qualifying early transfer of ownership.

If the transfer does not happen within two years after the Energy Sovereignty Proposed Transfer Date, the Designated System shall be removed from the applicable REC contract in accordance with Section 2.7(c) of the REC contract. Upon the removal of the Designated System, Buyer shall be entitled to payment by Approved Vendor (as the Seller) in the amount of the sum of: (i) the Collateral Requirement calculated at the time of the Trade Date

with respect to such Designated System; and (ii) one hundred percent (100%) of the total payments Seller has received from Buyer associated with RECs from such Designated System.

## 3. Approved Vendor Requirements and Registration

Like the Illinois Shines program, Approved Vendors will be responsible for facilitating participation in ILSFA. Only Approved Vendors will be eligible to receive REC payments through ILSFA as contractual counterparties directly. The Approved Vendor model will ensure the accuracy and quality of information submitted and reduce the administrative burden on the contractual counterparties. This benefits participants because they can verify that an entity that proposes to develop an onsite PV system (or sell them a subscription to a Community Solar project) is a legitimate entity participating in the Program. An Approved Vendor that fails to live up to the requirements of either the Illinois Shines program or the ILSFA program could significantly and negatively impact the entire renewable energy market in Illinois. The Agency and the Program Administrator need to have the ability to monitor the Program and ensure high-quality performance by Approved Vendors.

All ILSFA Approved Vendors, Designees, and registered subcontractors will be publicly listed on the [ILSFA website](#). Changes in company name and/or business status—such as suspension from the Program, bankruptcy, or a withdrawn or inactive status—will be noted on the relevant list.

### 3.1. Approved Vendors and Designees

In the 2024-2025 Program Year, the Approved Vendor Manual was updated to revise entity type terminology, roles, and requirements to be clear and consistent with Illinois Shines. The Approved Vendor is the key role: It sells the RECs from the solar project in exchange for the ILSFA incentive payment and is ultimately responsible for compliance with Program requirements. An Approved Vendor may register specifically as a Single Project Approved Vendor if it will serve as the Approved Vendor for only one project in ILSFA. Other entities that work on solar projects that will apply to ILSFA and have interactions with end-use customers must be registered as Designees. Other entities that participate in ILSFA (that are not acting as Approved Vendors and do not interact with end-use customers) may voluntarily choose to register as subcontractors.

#### 3.1.1 APPROVED VENDORS

An Approved Vendor will be the entity that is the contractual counterparty with either the IPA or an Illinois electric utility for RECs purchased through ILSFA and thus will be the entity that receives payments from the IPA or utility for REC deliveries as contract obligations are met. Approved Vendors are responsible for submitting documentation to the Program Administrator (as the party responsible for the information in that documentation), maintaining collateral requirements, and providing ongoing information and reporting. As such, the Approved Vendors will have to coordinate the downstream information from installers/developers and individual system owners who may provide required information through the installer/developer to satisfy project and Program requirements.

In previous Program Years, ILSFA had an entity type called “Aggregator” that relied heavily on other entities (Designees and subcontractors) to sell, develop, and manage solar projects. Following the terminology updates in the 2024-2025 Program Year, “Aggregators” are not differentiated from other Approved Vendors and are designated as a subtype only on the Approved Vendor Application. All Approved Vendors may use Designees and/or subcontractors, but the Approved Vendor is always ultimately responsible for compliance with Program requirements, including by any entity acting on its behalf.

### 3.1.2 DESIGNEES

Designees are entities that provide services within ILSFA on behalf of an Approved Vendor and that interact with the end-use customer. Designees cannot enter into REC contracts with the IPA or the utility; instead, they must use Approved Vendors to manage their long-term REC contracts and act as the counterparty to those contracts. However, Approved Vendors may find a market advantage in providing collective services for their Designees, like leveraging installation services, compliance with job training or MES requirements, or procurement. The Designee or the Approved Vendor may complete the project application. Designee status allows registered entities to have their own ILSFA portal accounts to manage project applications independently, as long as those accounts are formally associated with a registered Approved Vendor. Organizations working on Community Solar subscriber acquisition must register as a Designee (versus a subcontractor) to facilitate processing and uploading Disclosure Forms and to be listed on the ILSFA website.

While Approved Vendors are ultimately responsible for meeting all Program requirements, Designees must meet all project-level requirements, including quality assurance and inspection requirements. Failure to meet these requirements or poor-quality performance may result in disciplinary action, a warning, or suspension status for both the Designee and the Approved Vendor.

ILSFA Designees are not required to register for the Illinois Shines program, as ILSFA Approved Vendors are required to maintain good standing as an Approved Vendor with Illinois Shines. However, Designees must register for ILSFA in the same way as Approved Vendors. Designees can register for ILSFA once designated by an Approved Vendor and can work with multiple Approved Vendors. Approved Vendors must approve final registration submissions for their Designees before beginning to work on ILSFA projects. Designees can initiate project applications and assign each new project to an Approved Vendor at the time of project application.

### 3.1.3 SINGLE PROJECT APPROVED VENDOR

Entities can register as an ILSFA Single Project Approved Vendor if it serves as the Approved Vendor for only one ILSFA project. An entity may register as a Single Project Approved Vendor for the transfer of an already approved Illinois Solar for All project from an existing Approved Vendor. When an Approved Vendor wants to transfer a project to a Single Project Approved Vendor, with the condition that the implementation plan for the project remains consistent with the originally submitted project application, the [Single Project Approved Vendor Assignment Registration form](#) should be used.

Single Project Approved Vendors within the ILSFA program must meet the following requirements:

- The Single Project Approved Vendor will be the registered owner of the system.
- The total capacity of the system will be at least 50 kW AC.

A Single Project Approved Vendor entity can only serve as the Approved Vendor for a single project in ILSFA *or* Illinois Shines. An entity that has developed (or will develop) any projects in Illinois Shines may not serve as a Single Project Approved Vendor in ILSFA.

- A Single Project Approved Vendor must meet either the job training requirements of at least 10% of all hours performed by Eligible Job Trainees for a project or the Minimum Equity Standard of at least 14% of the project workforce be made up of Equity Eligible Persons (EEP).
- As a direct participant of the Program, a Single Project Approved Vendor must also first be approved as an Illinois Shines Approved Vendor.

The following ILSFA requirements are not applicable to Single Project Approved Vendor projects:

- Contract requirements for the agreement between the Approved Vendor and Program participant/system host
- The use of standard Disclosure Forms
- The use of ILSFA standard informational brochures

Note that for ILSFA Community Solar projects, all consumer protection requirements for ILSFA, as described in the Consumer Protection section of this Manual and the Consumer Protection Handbook, do apply for projects submitted by Single Project Approved Vendors. The Workforce Requirements section of this Manual provides further details about applicable job training and MES requirements.

### **3.1.4 SUBCONTRACTORS AND CONTRACTING WITH PARTICIPANTS**

The definition of an Approved Vendor, as provided in the 2026 Long-Term Plan, allows flexibility regarding the involvement of various entities in a given solar development.

In addition to Designees, Approved Vendors may utilize subcontractors. It is common in the solar industry for multiple business entities to have roles in the development process at different stages. Subcontractors may be used for any non-Approved Vendor role that does not have direct interaction with the end-use customer. If a solar developer maintains the REC contract, they must be the Approved Vendor and accept responsibility for meeting all Program requirements. Subcontractors also are not provided with access to the Vendor Portal and, therefore, may not submit project applications.

Some non-Approved Vendor solar companies acquire participants and may even install projects. But instead of managing long-term REC contracts, they transfer ownership to investor organizations. In these instances, the solar developer could act as a Designee, with the investor organization acting as an Approved Vendor. It is also feasible that the investor organization is the Approved Vendor and all other entities are Designees or subcontractors. In all instances, the Approved Vendor maintains the REC contract and is accountable for meeting all Program requirements.

Subcontractors must register as a Designee with the Program Administrator when working in a role that requires direct interaction with end-use customers (such as marketing, installation, lead generation, or sales). It is required that organizations working on Community Solar subscriber acquisition register as a Designee (versus a subcontractor), like all non-Approved Vendor entities that interact with end-use customers within the Program.

Registration shall encompass the subcontractor's provision of contact information, acknowledgment of the business relationship with the Approved Vendor, and identification of the categories of the services provided. Additionally, a subcontractor is responsible for acknowledging that they will comply with all applicable Program requirements. Failure by a subcontractor to comply with applicable requirements could subject them to suspension or revocation of their registration. If the subcontractor ignores a suspension (or revocation) decision made by the Program Administrator and continues its Program activity, nonetheless, any Approved Vendor that works with that subcontractor during that period will be subject to discipline. Likewise, Approved Vendors found to be working with entities engaged in the proscribed activities that fail to register will be subject to discipline.

The ultimate accountability for any given batch or project resides with the Approved Vendor. But, as stated previously and elsewhere in this document, the Program Administrator will monitor all entities and has the right to exclude any entity from performing work on ILSFA projects.

## **3.2. Roles in the Approved Vendor Model**

While the Approved Vendor is ultimately accountable for meeting all Program requirements, individual project requirements and installation quality will be tracked to Designees and subcontractors as well. As such, the same

standards of consumer protection and quality of service will be required of all entities involved in ILSFA, and each entity may be subject to disciplinary action or suspended from the Program accordingly. Specifically, Designees need to register with ILSFA and submit subcontractor information as part of the project approval process, with job training or MES, consumer protection, and quality assurance performance tracked to these entities on an ongoing basis.

Like the Illinois Shines program, there is no specific delegation of duties among the Approved Vendor, installer/developer, and system owner, except as described above. The key consideration is that the Approved Vendor is ultimately responsible for the fulfillment of contractual obligations, including any obligations delegated to Designees or subcontractors, in a manner consistent with the requirements of the 2026 Long-Term Plan and the Approved Vendor's REC contract with the relevant counterparty.

The ILSFA Program Administrator will perform an annual review for each Approved Vendor and Designee to assess compliance with Program requirements. Annual performance reviews may result in disciplinary action or suspension from the Program. Losing status as an ILSFA Approved Vendor would not relieve an Approved Vendor of its contractual obligations to ensure that RECs from its Energized projects continue to be delivered to the applicable entity; failure to do so could result in having the vendor's credit collateral drawn upon. For annual renewal requirements, see Section 3.8.

### 3.3. Approved Vendor and Designee Registration Process

Approved Vendors and Designees may register through the [Approved Vendor Requirements and Registration](#) page. After the applicant has successfully completed the Illinois Shines Approved Vendor application process (where applicable), they may begin the ILSFA Approved Vendor registration process by creating an account and submitting answers to a series of questions. While Designees participating in ILSFA are not required to register with the Illinois Shines program, a partner Approved Vendor must first confirm its relationship to the Designee and approve the registration submission for the ILSFA program.

The registration process for all Approved Vendors and Designees requires the applicant to provide specific information describing the entity's anticipated work with ILSFA, relevant experience, and plans for meeting all Program requirements.

Many entities may work together to bring ILSFA projects to market and contribute to the Approved Vendor meeting Program requirements. As such, responses to registration questions may represent the experience, expertise, or work performed/to be performed by entities other than the Approved Vendor. For example, an Approved Vendor using Designees or subcontractors may use the experience, expertise, staffing details, and planning of those entities to respond to questions, including those related to meeting job training requirements. As of the 2024-2025 Program Year, entities are no longer permitted to register as an "Aggregator." "Aggregator" is a subtype in the general Approved Vendor designation. Any entity that would have previously registered as an "Aggregator" must register as an Approved Vendor. The entity will still be permitted to work with Designees and will be required to submit a community engagement plan through its Designee. The community engagement plan may describe the community engagement of the Approved Vendor's Designees.

The Approved Vendor and Designee application asks questions that require a basic understanding of the responsibilities and requirements of participation in ILSFA, and for the applicant to make a clear and concise case for their capacity to fulfill such expectations. Applicants should read these requirements and registration questions carefully before beginning the registration process and develop a clear strategy for collecting the required information. Much of the information collected during registration is captured in a narrative form, and applicants should provide nuanced details for each subject area. Applicants must use this format to convey a clear understanding of each entity anticipated to be working on ILSFA projects, to clarify their roles, and to clearly state how each response corresponds to those entities.

After receiving an application, the Program Administrator will either approve the application, deny the application, or communicate any deficiencies to the applicant. Once the applicant corrects the deficiencies, a determination will be made and communicated to the applicant. If the Program Administrator does not receive a response after 10 business days after communicating deficiencies to the applicant, it has the right to cancel the application. Note that Approved Vendor and Designee applications submitted shortly before, or during a project submission window, may not be reviewed prior to the closing of the project submission window. Registration forms should be received no later than 30 calendar days prior to an initial submission window opening of a Program Year within any sub-program. This allows the Program Administrator time to review forms and the applicant to respond to requests for clarification.

The Program Administrator will review and approve or reject all Approved Vendor and Designee applications. It is the responsibility of the Approved Vendor and/or Designee to respond to any questions or requests for additional information from the Program Administrator within two weeks of receiving such a request. Failure to respond to requests from the Program Administrator will constitute grounds for rejection as an Approved Vendor or Designee. Similarly, if a prospective Approved Vendor or Designee is found to have provided incorrect or misleading information within their application, the Program Administrator reserves the right to grant conditional approval of an application or outright reject an application, as detailed below. Any rejected Approved Vendor or Designee applications will be provided with a written explanation of the reasons for the rejection. The Program Administrator's rejection of an application may be appealed to the IPA as described in Section 1.4 of this Manual.

The IPA and the Program Administrator (Program Team) reserve the right to conditionally approve applications from prospective Approved Vendors or Designees when those applications have areas of concern to the Program Team. If conditional approval is warranted, the Program Administrator will develop conditions appropriate to address the concerns that the prospective or renewing Approved Vendor must meet. For example, a conditional approval may require an Approved Vendor to renew their application every six months instead of every year, or may include reporting requirements or regular check-ins with the Program Administrator. If an entity is conditionally approved as an Illinois Shines Approved Vendor, it will also be considered to be conditionally approved in ILSFA, and any conditions may be imposed in both Programs.

### **3.3.1. SMALL AND EMERGING BUSINESS REGISTRATION PROCESS**

Section 1-56(b)(2) of the IPA Act instructs the Agency to “make every effort to ensure that small and emerging businesses, particularly those located in low-income and environmental justice communities, are able to participate in the Illinois Solar for All Program.”<sup>29</sup> The 2026 Long-Term Plan introduces new opportunities to increase Small and Emerging Business (“SEB”) participation in ILSFA, including collateral deduction from the REC payment (see Section 11.1) and prioritization within the Project Selection Protocol.

The Small and Emerging Business registration process takes place entirely in the Illinois Shines Program, during the Approved Vendor's registration or renewal. The Illinois Shines Program Administrator is responsible for the review and approval of applications.

Entities that meet the definition of either a “small business” or “emerging business” registering as Approved Vendors in the Illinois Shines Program after May 31, 2026, will be able to request SEB designation within the Illinois Shines Approved Vendor registration process.

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<sup>29</sup> 20 ILCS 3855/1-56(b)(2)

Approved Vendors who were registered in Illinois Shines before May 31, 2026, who meet the definition of either a “small business” or “emerging business” may request an SEB designation by submitting an SEB Designation application.

Qualifying entities will confirm SEB designation by submitting supporting documents alongside their initial Approved Vendor application in Illinois Shines or within the SEB Designation application. Once an Approved Vendor has applied for SEB designation within Illinois Shines, the designation will also be applied to their status as an Approved Vendor in ILSFA. Single Project Approved Vendors are not eligible for designation as a Small and Emerging Business in either ILSFA or Illinois Shines.

To receive designation as a Small and Emerging Business in both Illinois Shines and ILSFA, the Approved Vendor will have to demonstrate one of the following:

- Qualification as an “emerging business”: Demonstration that the entity has been authorized to do business in a U.S. state, district, or territory for less than three years.
  - Examples of qualifying documentation:
    - Certification from a government agency/organization authorizing the entity to conduct business in a state, district, or territory with a date of issuance (e.g., Corporation/LLC File Detail Reports or LLC Annual Reports).
    - An EIN Issuance Letter from the Internal Revenue Service with a date of issuance.
    - Other documents providing evidence of the entity’s authorization of business (accepted at the Program Administrator’s discretion), or
- Qualification as a “small business”: Demonstration that the entity (1) is independently owned and operated, and (2) has a gross revenue of less than \$4 million in the previous calendar year.
  - Example of qualifying documentation showing the business’s ownership structure:
    - Operating Agreement
  - Another document providing evidence of the entity being independently owned and operated (accepted at the Program Administrator’s discretion).
  - Examples of qualifying documentation showing the business’s gross revenue:
    - Business income tax returns from the previous year (e.g., IRS Form 1120, 1120S, 1065)
    - A filed Schedule C from the previous year (Form 1040)
    - Audited or reviewed financial reports produced by an independent party.
    - Other documents providing evidence of the entity’s revenue are accepted at the Program Administrator’s discretion).

The Illinois Shines Program Administrator will review SEB designation requests and supporting documentation for both new and existing Approved Vendors seeking SEB designation. The Illinois Shines Program Administrator will determine if the business has satisfied the eligibility criteria, in consultation with the Agency. The Program Administrator may request additional documentation or information.

Documents submitted to the Illinois Shines Program Administrator containing commercially sensitive information will be governed by the requirements established in the Illinois Shines Program Guidebook, Chapter 2, Section F.

An Approved Vendor’s status as an “emerging business” will expire at the end of the Program Year of the third full year the business has been authorized to do business in any U.S. state, district, or territory for three years. For example, an entity authorized to do business on December 1, 2025, during the 2025-26 Program Year would have its emerging business status expire at the end of the 2028-29 Program Year on May 31, 2029.



In another example, an entity authorized to do business on December 1, 2025, that was designated an SEB during the 2025-2026 Program Year, would have its emerging status expire at the end of the 2028-2029 Program Year on December 1, 2028. The Illinois Shines Program Administrator will track the expiration of entities qualifying under the “emerging business” criteria. The Illinois Shines Program Administrator will inform entities qualifying under the “emerging business” criteria upon expiration of their “emerging” status through the renewal process.

Approved Vendors qualifying as SEBs under the “small business” definition will need to renew their status annually to maintain their SEB designation during the annual Illinois Shines Approved Vendor renewal process, to maintain their SEB designation during the annual Illinois Shines Approved Vendor renewal process. If an Approved Vendor no longer meets SEB designation criteria, they will maintain their status through the end of the Program Year. To maintain consideration as a “small business,” the Approved Vendor will be required to provide the Program Administrator with current documentation demonstrating ongoing qualification.

### 3.4. Registration Requirements and Scoring Rubric

Every question in the Approved Vendor or Designee application has a maximum possible score. Some questions also include a minimum required score, which the question expressly states. Failure to meet this minimum score requirement will disqualify the applicant. Explanations for each question indicate how the various scores will be evaluated and guide the applicant on how to achieve minimum scores or generally what to expect with each question's evaluation. The overall minimum score will vary by applicant based on their registration type and the types of projects they plan to develop through the Program. All applicants must achieve a minimum of 64% of points out of all possible points to qualify for registration. For example, Approved Vendors *not* installing Community Solar projects would need a minimum of 41 out of a possible 64 points to qualify. Approved Vendors installing Community Solar projects would need a minimum of 54 out of a possible 85 points to qualify.

The Program Administrator will request additional, clarifying responses within 10 business days from applicants with insufficient or unclear information. The Program Administrator may ask applicants with scores below the minimum required scores for additional or clarifying information to satisfy areas that may lead to a qualified submission.

There are three different applications: Approved Vendor, Designee, and Single Project Approved Vendor. Applications are completed online at the [Approved Vendor Requirements and Registration](#) page of the ILSFA website. Subcontractors should submit a signed Registration form via email to [vendors@illinoisSFA.com](mailto:vendors@illinoisSFA.com). Electronic versions can be found below for reference:

- [ILSFA Approved Vendor Registration Form and Attestations](#)
- [ILSFA Designee Registration Form and Attestations](#)
- [ILSFA Single Project Approved Vendor Registration Form and Attestations](#)

- [ILSFA Subcontractor Registration and Attestation](#)

## 3.5. Approved Vendor and Designee Support

The Program Administrator will assign a Vendor Manager to each prospective Approved Vendor or Designee upon approval of the registration application. The Vendor Manager will act as the primary point of contact through the registration process, project applications, and ongoing ILSFA performance processes. Vendor Managers will provide one-on-one support to applicants, Approved Vendors, and Designees as needed. Applicants with insufficient registration applications will receive guidance to correct inadequacies where possible.

In addition to incentivizing the participation of Minority- and Women-owned Business Enterprises (“MWBE”)<sup>30</sup> in the Project Selection Protocol, the IPA Act also directs ILSFA to ensure that “small and emerging businesses”<sup>31</sup> are able to participate in ILSFA. The Program Administrator is making efforts to expand MWBE Approved Vendors and SEB Approved Vendors participation through direct outreach to prospective small and emerging businesses, MWBE Approved Vendors, and equity-focused industry groups. The Program Administrator offers resources for MWBE Approved Vendors and SEB Approved Vendors, such as training, workshops, one-on-one technical assistance, networking opportunities, and webinars.

Illinois Solar for All and Illinois Shines offer the Small and Emerging Business Guide for businesses interested in participating in the Illinois Shines and Illinois Solar for All programs. This resource guide is intended to help businesses navigate the solar landscape in Illinois by providing essential information on programs and markets. In addition, the 2026 Long-Term Plan introduces several initiatives for SEBs. These include SEB Approved Vendors being able to deduct the 5% collateral requirement from the REC contract for up to five projects under Contract, additional time for project submissions during the rolling submission period, and the potential for additional scoring points during project selection.

## 3.6. Approved Vendor Conduct and Violation of Requirements

### 3.6.1 CODE OF CONDUCT

Approved Vendors and their Designees, subcontractors, representatives, and agents are expected to perform all work under the ILSFA program in a way that is consistent with the highest technical and ethical standards in their industry. Participation in the ILSFA program is voluntary and comes with an obligation to provide high-quality and timely work, maintain and honor Program-required system design parameters and warranties, work to gain participant satisfaction, and resolve disputes constructively. ILSFA Approved Vendors are expected to work with the Program Administrator in a responsive, forthright, and constructive manner. All Approved Vendors, Designees, and subcontractors are expected to conduct any and all business affiliated with the ILSFA program in a responsible manner that fosters integrity and public confidence. Work receiving incentives through ILSFA shall be in full

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<sup>30</sup> Minority- and Women-owned Business Enterprise or “MWBE” means a business certified as such by an authorized unit of government or other authorized entity in Illinois. Additional information about certifying entities can be found on the [ILSFA Approved Vendor Questionnaire for MWBE Approved Vendors](#).

<sup>31</sup> The Program will define a “small” business as any for-profit entity, independently owned and operated, that grosses less than \$4 million per year, while “emerging business” is defined as a business that has been authorized to do business in any U.S. state for less than three years.

compliance with all applicable building codes and professional industry standards, as well as in accordance with all applicable federal, state, and local laws, rules, and regulations. Approved Vendors, Designees, installers, and subcontractors will maintain all required professional licenses or regulatory certifications and are expected to comply with all ILSFA program requirements.

### 3.6.2 PROHIBITED ACTIVITIES

Approved Vendors and their representatives and agents are prohibited from:

- Engaging in fraud
- Misrepresenting Program or project data to participants, such as energy loads and bills, savings, and system production
- Providing inaccurate information to the ILSFA Program Administrator, such as participant household eligibility information, installed equipment, shading analysis, and use of Eligible Job Trainees or Equity Eligible Persons, and subcontractors
- Deceiving or attempting to deceive participants or the Program Administrator about any fact or information pertaining to a project
- Forging or falsifying paperwork (e.g., interconnection, permitting, zoning, tax returns, certified payroll transcripts, disclosures, DG Installer certification status)
- Creating safety hazards or property damage resulting from poor workmanship
- Engaging in a pattern of poor workmanship or poor-quality professional services
- Taking any action to circumvent ILSFA quality control processes
- Refusing to honor Program-required warranties
- Engaging in behavior that could result in financial harm to the participant
- Treating participants in a disrespectful or unprofessional manner
- Paying workers less than the applicable prevailing wage rate for the applicable class of work on a project that is subject to prevailing wage requirements

Whether any action, activity, or omission violates, or is prohibited by this policy, shall be determined by the ILSFA Program Administrator in its sole discretion.

### 3.6.3 VIOLATION OF PROGRAM REQUIREMENTS

The Program Administrator may determine that an Approved Vendor, Designee, or other entity is not acting or has not acted in compliance with ILSFA requirements and take pre-disciplinary or disciplinary action. The cause for these disciplinary actions may include, but is not limited to, engaging in any of the Prohibited Activities listed above, violating any requirement of the [Consumer Protection Handbook](#), failing to respond in a timely manner to the Program Administrator's and/or IPA's notices or requests for information, or any other act or omission that constitutes a violation of this Approved Vendor Manual or any other ILSFA requirement.

The Program Administrator will follow the processes in Section X.C. and X.D. of the Consumer Protection Handbook whenever it believes an Approved Vendor, Designee, or other entity is not acting or has not acted in compliance with Program requirements. Typically, the first step after the Program Administrator identifies a potential violation is to prepare and send the entity a Notice of Potential Violation ("NOPV") that identifies the problematic behavior, explains how it is or may be non-compliant with ILSFA requirements, requests more information about the issue, and includes information on possible penalties.

After giving the entity a reasonable time to respond and considering any response provided, the Program Administrator may select an appropriate response from the Program Violation Response Matrix ("Matrix") in Section X.D. of the Consumer Protection Manual if it concludes that a Program violation has occurred. The Matrix

contains several non-disciplinary and disciplinary response options— including corrective actions and compliance plans, formal warning letters, and more significant disciplinary actions such as suspension and revocation of Approved Vendor status or Designee status—along with a summary of when such responses are appropriate and several factors for the Program Administrator to consider when determining its response. Although this Matrix was developed for consumer protection violations, the Program Administrator will follow a similar approach for other violations of ILSFA requirements, as appropriate.

The Program Administrator will provide a copy of any NOPV, formal warning letter, or other response used to take disciplinary or non-disciplinary corrective action to the IPA. The Approved Vendor, Designee, or other entity may appeal any formal warning letters, corrective actions, compliance plans, and disciplinary actions issued by the Program Administrator in writing to the IPA following the process outlined in Section 1.4 of this Approved Vendor Manual and any other directions provided in the Program Administrator’s determination letter. The IPA will endeavor to issue final determinations on appeals, including a supporting rationale for its decision, as soon as practicable after the receipt of an appeal and review of relevant information.

### **3.6.4 DISCIPLINE**

When a violation of ILSFA requirements results in the Program Administrator issuing a suspension, the notice of suspension will contain the specific details, including prohibited activities during the suspension, conditions for reinstatement, and the duration of the suspension.

NOTE: Consistent with the Illinois Shines program, “Approved Vendors barred, suspended, revoked, or otherwise limited in their participation with the Adjustable Block Program will be immediately barred, suspended, revoked, or otherwise limited in their participation in the Illinois Solar for All Program, and vice versa”<sup>32</sup> and “Designees barred, suspended, revoked, or otherwise limited in their participation with the Adjustable Block Program will be immediately barred, suspended, revoked, or otherwise limited in their participation in the Illinois Solar for All Program, and vice versa.”<sup>33</sup>

The Program Administrator maintains a [public list](#) of Approved Vendors. This public list has been developed in the interests of fairness, transparency, and awareness to help ensure that all Approved Vendors/Designees are aware of disciplinary decisions and, thus, do not unknowingly partner with Approved Vendors/Designees who are suspended from the Program. The public list also provides information to potential project hosts, installers, and other interested parties.

The Program Administrator also maintains a Consumer Complaint Report on the [ILSFA website](#).

## **3.7. Changes to Approved Vendors and Projects**

### **3.7.1 UPDATES TO APPROVED VENDOR TEAM**

Approved Vendors and Designees are required to maintain accurate and up-to-date contact information within our systems. In the event of a change to the primary communication email, staff turnover, or any internal restructuring affecting the point of contact, the Approved Vendor or Designee must notify the Approved Vendor Manager promptly. Illinois Solar for All is not responsible for any missed communications, missed deadlines, or uncompleted actions resulting from notifications sent to an incorrect, outdated, or unmonitored inbox. Timely updates are essential to ensure uninterrupted communication and the continued validity of the entity’s registration status.

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<sup>32</sup> See Section 2.A of the Illinois Shines [Program Guidebook](#).

<sup>33</sup> See Section 2.G of the Illinois Shines [Program Guidebook](#).

### 3.7.2 MULTIPLE APPROVED VENDORS

In a case where one Approved Vendor submits a Part I application for a project, and then a second Approved Vendor submits a new Part I application for a project at the same location at any point in the review process prior to the submission of the batch to the ICC, the Program Administrator will proceed as follows in attempting to resolve the potential conflict.

The Program Administrator will first investigate (including potentially contacting the site host) whether there is an intent for the multiple project applications to be for separate, co-located projects (and if so, whether the co-location would be allowed under Program terms and conditions).

- If co-location is intended and feasible, then the Program Administrator will allow for co-location. If co-location is not both intended and feasible (i.e., if the two applications appear to represent the same project), the Agency will review the documents submitted with the Part I applications to determine which Approved Vendor is premising its control of RECs on an earlier-executed site control agreement that has not lapsed (or, if both Approved Vendors rely on the same site control agreement, then which Approved Vendor has an earlier-executed REC control agreement that has not lapsed); this Approved Vendor will be presumed to be the proper representative of the project.
- An Approved Vendor with a later-executed site control or REC control agreement (as applicable) will be given an opportunity to furnish documentation showing that the earlier-executed instrument was properly terminated prior to that Approved Vendor's Part I ILSFA application. If acceptable documentation is provided (subject to confirmation with the other Approved Vendor), then the application from the Approved Vendor with the later-executed agreement would proceed (subject to any other review and approvals of the application).

### 3.7.3 CHANGE OF APPROVED VENDORS

A project that has been waitlisted or otherwise not yet selected for a REC contract may change its Approved Vendor. This switch of Approved Vendors may only happen at the batch level, in accordance with the REC contract terms and Section 7.10.6 of the 2026 Long-Term Plan.

While it is not necessary to seek Program Administrator approval in advance of commencing this transaction, the Approved Vendor transferring the project ("Transferor") and the Approved Vendor receiving the project ("Transferee") must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ILSFA application. The documentation also must show that the project host (and the project owner, if different) consent to the change of Approved Vendor.

Please note that if a project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if Community Solar, could, if applicable, be newly considered co-located after being taken by the Transferee Approved Vendor. The co-located pricing provision will only be applicable if the Illinois Commerce Commission's approval of the second project is within two years or less of the ICC's approval of the first project. If the first project has not yet received ICC approval at the time of the second project's approval, then the co-located pricing provision will apply.

### 3.7.4 SALE OF AN APPROVED VENDOR

Additionally, the sale of an Approved Vendor is permissible. A change in ownership of the Approved Vendor (e.g., the sale of an entire LLC to a new entity) with no change to the Approved Vendor/project pairings does not require IPA consent. Still, it requires the Approved Vendor to alert the Program Administrator of the change and provide

documentation of the sale.<sup>34</sup> The new owner will need to submit an Approved Vendor application with details specific to its ownership of the LLC (see Section 3.3 for more information on Approved Vendor requirements). Additionally, the new owner must contact the REC contract Buyer (the contracting utility or the IPA) to update its contact and banking information for the respective REC contracts with the Buyer.

### 3.7.5 SALE OF A PROJECT

A sale of the project itself (or a majority equity share in the project) that results in a new system owner but not a new Approved Vendor is allowed while the project remains unselected for a REC contract. In such a case, the Approved Vendor should contact the Program Administrator in order to update the ownership data for the project in the ILSFA portal. This project ownership change would not change any previous determination that the project was co-located, and it could, if applicable, cause the project to be newly considered co-located. The co-located pricing provision will only be applicable if the Illinois Commerce Commission's approval of the second project is within two years of the ICC's approval of the first project. If the ICC has not yet approved the first project at the time of the second project's approval, then the co-located pricing provision will apply.

## 3.8. Approved Vendor and Designee Renewal

Approved Vendors and Designees must annually renew their registration. This helps the Program Administrator keep the list of participating Approved Vendors and Designees current. Sales agent training materials and certification of sales agent training will be collected at the time of renewal.

### 3.8.1 APPROVED VENDOR RENEWAL

All ILSFA Approved Vendors must also be Approved Vendors in the Illinois Shines program, and Illinois Shines Approved Vendors are required to renew their applications annually. As part of this annual renewal process, ILSFA Approved Vendors must submit their ILSFA sales agent training materials and certification of sales agent training to the Illinois Shines Program Administrator. The ILSFA Program Administrator will review the materials to confirm compliance with Program requirements and conduct any necessary follow-up with the ILSFA Approved Vendors.

Illinois Shines Approved Vendors are permitted to change their status to "withdrawn" or "inactive." In order to maintain their status as an active ILSFA Approved Vendor, entities must remain in active status with Illinois Shines. If an Approved Vendor becomes "inactive" in Illinois Shines, it must either become "inactive" in ILSFA as well or "withdraw" as an Approved Vendor in ILSFA. If an Approved Vendor "withdraws" from Illinois Shines, it must also "withdraw" from ILSFA.

ILSFA Approved Vendors may request to change their ILSFA status to "withdrawn" or "inactive." If an Approved Vendor no longer wishes to act as an Approved Vendor for new ILSFA projects, it may apply to change its ILSFA Approved Vendor registration status to "inactive." An Approved Vendor may become "inactive" only if:

- The Approved Vendor's Residential Solar and Non-Profit and Public Facility projects (if any) have been Part II approved
- The Approved Vendor does not have any Community Solar projects currently under an ILSFA REC contract, or that will in the future be under an ILSFA REC contract
- The Approved Vendor will not serve as an Approved Vendor or submit Program applications for any additional projects

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<sup>34</sup> The seller's Approved Vendor profile and banking information will not be visible to the new owner of the Approved Vendor after a sale.

Inactive Approved Vendors are responsible for ongoing obligations related to their existing REC contracts but are not authorized to otherwise participate in the Program as an Approved Vendor (for example, by marketing the Program to potential customers). Inactive Approved Vendors do not have to renew their Approved Vendor application each year; instead, they simply have to confirm basic contact information on an annual basis. An Inactive Approved Vendor will still be required to file an Annual Report if they had any projects generating REC payments under a REC contract in the Program in the previous 12 months. An entity may become an “inactive” Approved Vendor and still participate as an active Designee if it has properly registered as such.

If an Approved Vendor no longer wishes to participate at all in ILSFA, it may apply to change its Approved Vendor registration status to “withdrawn.” An Approved Vendor may withdraw only if:

- The Approved Vendor never submitted any project applications; or
- The Approved Vendor no longer has any projects under an active ILSFA REC contract and does not plan to submit any additional projects to the Program.

Approved Vendors who withdraw no longer have any authorization to act as an Approved Vendor in ILSFA. Withdrawn Approved Vendors will not have to renew their Approved Vendor application each year or submit an Annual Report. An entity may withdraw as an Approved Vendor and still participate as an active Designee if it has properly registered as such. An Approved Vendor may not simply fail to renew its application or fail to submit ILSFA materials as part of its Illinois Shines renewal. If it wishes to become inactive or withdraw, it must affirmatively apply for the new status. Failure to renew and/or provide required ILSFA materials (or, in the alternative, to apply to become inactive or withdrawn) may lead to disciplinary action, which may also apply to the entity’s participation as a Designee, if applicable.

If an entity changes its registration status to “inactive” or “withdrawn,” this will also be noted on the public list of registered entities on the ILSFA website.

### 3.8.2 DESIGNEE RENEWAL

Unlike Approved Vendors, ILSFA Designees do not apply to, nor register with, Illinois Shines. Designees must annually renew their registration directly with the ILSFA Program Administrator. Designees will be informed annually by the Program Administrator when they need to submit a renewal and will be provided with a renewal registration form. Renewal registration may request all of the same information as initial registration and will require Designees who perform marketing and/or sales functions to submit sales agent training materials and certification of sales agent training.

If a Designee no longer wishes to participate in ILSFA and has no ongoing work related to ILSFA or ILSFA projects, it may indicate its intent to withdraw from the Program on the renewal form. A Designee’s failure to submit the renewal form may be considered a violation of Program requirements, but will not cause their status to be updated to “inactive”.

## 4. Project and Participant Eligibility

Eligibility for ILSFA varies by sub-program, with specific eligibility requirements for participants and project types. This section focuses on defining eligibility and the prescribed methods for verifying it.

These differences require that each sub-program have distinct eligibility descriptions and verification processes. These guidelines will provide sub-program-specific details for project and participant eligibility requirements and the prescribed methods for collecting and verifying eligibility data. It is the responsibility of the Approved Vendor to ensure that these requirements are met and that prescribed processes are followed.

**NOTE:** A single project can be submitted to only one ILSFA sub-program in a given Program Year.

## 4.1. Illinois Solar for All: Residential Solar (Small and Large)

### 4.1.1 PROJECT ELIGIBILITY

- Residential Solar (Small and Large) systems are installed onsite on residential properties.
- Systems are installed behind a participant's meter and are used to offset the load of one or more qualifying residential households occupying that property.
- Occupants receive the value of energy produced by the installed system through:
  - Net metering or avoided usage connected directly to individual participant meters. Indirect benefits, such as lowered rents, stabilized rents, or other benefits or services, the value of which can be demonstrated by the property owner or manager, are connected directly to the common meter of the building.
- The project meets all consumer protection requirements and other ILSFA requirements.
- All participants, with the exception of Residential Solar (Large) projects (projects on properties with five or more units), where the participant purchases the system, and Community Solar projects that are organized as cooperatives, pay no upfront costs (defined as prior to project Energization). Any ongoing costs and fees are less than 50% of the value of the energy generated by the system each year. See Section 5 of this Manual, Participant Savings Requirements, for specific savings calculations.

A system will be considered a single system if a project uses technology in a multifamily residential building that takes a single distributed generation system and allows multiple units with individual utility meters to accept the energy produced by the system. The number of units in the building will determine the REC price and whether the system can participate in the Residential Solar (Small) or (Large) sub-program.

### 4.1.2 PARTICIPANT ELIGIBILITY

- For single-family homes, households must verify that their household income is 80% or less of area median income (AMI).
- For two- to four-unit buildings, at least two of the households must verify that their household income is 80% or less of AMI.
- For five-unit and larger residential buildings, either 1) at least 50% of the units in the building must be verified as income-eligible, or the building must be demonstrated to meet the definition of "affordable housing" contained in the Illinois Affordable Housing Act;<sup>35</sup> 2) the property qualifies for either U.S. Department of Housing and Urban Development Project-Based Vouchers or Project-Based Rental Assistance; or 3) the property qualifies for Income-Eligible Multi-family Energy Efficiency. The income qualification level required for participation in these programs is lower than the income requirements for the Illinois Solar for All program.
- See Section 6, Project and Participant Verification, below, for prescribed methods of verification.

### 4.1.3 ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the Residential Solar sub-programs may qualify as an Energy Sovereignty project and thus be eligible for the Energy Sovereignty REC adder if they exhibit either:

- Contract between Approved Vendor and participant includes a defined path to system ownership by the participant within seven years of Energization;

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<sup>35</sup> 310 ILCS 65/3(e)

- Evidence of current full or majority ownership of the system by the host, such as a system purchase contract, subject to applicable prohibitions on upfront costs; or
- Immediate participant ownership of the full or majority installation equity, as evidenced by a system purchase contract or similar proof of ownership.

## 4.2. Non-Profit and Public Facilities

### 4.2.1 PROJECT ELIGIBILITY

Non-Profit and Public Facilities sub-program projects are installed onsite on properties either (i) occupied by a qualified non-profit organization; or (ii) occupied by a public entity.

- Systems are installed behind a participant’s meter and used primarily to offset a single participant’s load of the qualified non-profit or public entity.
- Occupants receive the value of energy produced by the installed system through net metering or avoided usage connected directly to individual participant meters. Ongoing costs and fees are not to exceed 50% of the value of the energy generated by the system.
- The project meets all consumer protection guidelines and other Program requirements.

The Agency will also no longer allow distributed generation projects serving multifamily residential facilities to participate in the Non-Profit and Public Facilities sub-program since these types of projects qualify to apply for the Residential Solar (Large) sub-program. ILSFA will not include public schools in the Non-Profit and Public Facilities sub-program beginning with the 2023–2024 Program Year.<sup>36</sup> Note: Under the Illinois Power Agency Act, the definition of “public schools” for this Program comes from the Illinois School Code, which includes any public school, common school, alternative public school, charter school, or free school operated by the authority of the Illinois School Code, including Illinois public schools from pre-school through grade 12, and vocational schools over which the State Board of Education has authority.<sup>37</sup>

Except for projects that serve as a house of worship<sup>38</sup> and are less than 100 KW AC (aggregated with any co-located systems), all Non-Profit and Public Facilities projects submitted after June 30, 2023, and selected for ILSFA incentives must comply with the requirements of the Prevailing Wage Act (820 ILCS 130), including all requirements to provide notice to subcontractors and on worksites. For more information on how the Program Administrator will review prevailing wage compliance, see Section 15.7.

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<sup>36</sup> Section 8.5.6.1 of the 2026 Long-Term Renewable Resources Procurement Plan. Public schools are phased out after the 2022–2023 Program Year.

<sup>37</sup> PA 103-0580 updated the definition in the IPA Act to define Public Schools. “Public schools shall have the meaning set forth in Section 1-3 of the School Code and includes public institutions of higher education, as defined in the Board of Higher Education Act.” The Board of Higher Education Act defines it as “Public institutions of higher education: The University of Illinois; Southern Illinois University; Chicago State University; Eastern Illinois University; Governors State University; Illinois State University; Northeastern Illinois University; Northern Illinois University; Western Illinois University; the public community colleges of the State and any other public universities, colleges and community colleges now or hereafter established or authorized by the General Assembly.”

<sup>38</sup> “House of worship” is defined as a property that is both (1) used exclusively by a religious society or body of persons as a place for religious exercise; or religious worship and (2) recognized as exempt from taxation pursuant to Section 15-40 of the Property Tax Code.

## 4.2.2 PARTICIPANT ELIGIBILITY

- Serves the energy loads of a building that is occupied by an organization (or, in the case of a public facility, a department/agency) that is a Critical Service Provider (“CSP”) for the community. The process for obtaining the CSP designation is described in Section 4.4.
- Is located within an IEC, EJC, or in a census block adjacent to an EJC or IEC within the state of Illinois:
  - EJCs, or Environmental Justice Communities, are defined as block groups that score in the top 25% of weighted exposure, environmental, and socioeconomic indicators across the service areas of each Regional Transmission Organization (“RTO”) in the State of Illinois, as outlined in Section 8.12.2 of the 2026 Long-Term Plan. A map and address look-up tool is available for designated communities during the 2026-2027 Program Year. An additional process is available for representatives of communities to apply to have their geographic area designated as an EJC, even if the Program’s quantitative methodology did not so determine it.
  - Note: The ILSFA Environmental Justice Community Map is updated at least every five years and will be updated for the 2026-2027 Program Year using the 2024 version of EJScreen. The 2025-2026 and 2026-2027 EJC designations will be accepted as EJCs for the 2026-2027 Program Year.

- IECs, or Income-Eligible Communities, are defined as census tracts that have a majority (50% or greater) of households at 80% or less of AMI. A map and address look-up tool is available for eligible communities during the 2026-2027 Program Year.<sup>39</sup>
  - Note: The Income-Eligible Communities Map is updated annually and will be updated based on U.S. Census data and 2026 HUD income limits for the 2026-2027 Program Year. The 2025-2026 and 2026-2027 IEC areas will be accepted as IECs for the 2026-2027 Program Year.
  - Adjacent Census Blocks are defined as a neighboring statistical geographic area that shares a common boundary with a census tract, which is, at that point in time, designated as an Environmental Justice Community or an Income-Eligible Community for the purpose of eligibility to participate in the Non-Profit and Public Facilities sub-program.<sup>40</sup>
  - The Agency will publish map layers within the IEC and EJC Maps to highlight the eligible adjacent areas for the 2026-2027 Program Year, and update them for future Program Years in the cadence of their respective map. The IEC Adjacent Census Tract map layer will be updated annually, and the EJC Adjacent Census Block map layer will be updated at least every five years or upon approval of additional self-designated EJCs.
  - Has sufficient connection to, and input from, the IEC or EJC members the non-profit or public entity serves by:
    - Providing a narrative summary by the proposed entity that demonstrates that the non-profit or public facility actively engages with, and impactfully serves, a local Income-Eligible Community or Environmental Justice Community.
    - Listing community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of their work in a local Income-Eligible Community or Environmental Justice Community.
    - A qualified Critical Service Provider is a non-profit or public entity that offers critical services to IECs or EJCs. A full list of qualified Critical Service Provider entities and the qualification request for entities not reflected on that list may be found in Section 4.4. Documentation of CSP status must be submitted by no later than the time of Part I application.
    - If the entity is sited within an IEC, EJC, or adjacent census block, standard documentation will be required, whether the entity is qualified or seeking qualification as a Critical Service Provider.

### 4.2.3 ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the Non-Profit and Public Facilities sub-program may qualify as an Energy Sovereignty project and be eligible for the Energy Sovereignty REC adder if they exhibit the following elements:

- Lease or PPA contract between Approved Vendor and participant includes a defined path to system ownership by the participant within seven years of Energization
- Evidence of current full or majority ownership of the system by the host, such as a system purchase contract.

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<sup>39</sup> For the purpose of the ILSFA Approved Vendor Manual, Income-Eligible Communities are considered “low-income communities” per the [2026 Long-Term Renewable Resources Procurement Plan](#), “low-income community” for this purpose is defined as a census tract where at least half of households are not exceeding 80% of AMI.

<sup>40</sup> Projects in adjacent census blocks will be eligible to participate in the Non-Profit and Public Facilities sub-program but will not satisfy the environmental justice carveout nor receive additional points in project selection.

## 4.3. Community Solar

### 4.3.1 PROJECT ELIGIBILITY

- Community Solar sub-program projects are installed on rooftops or ground-mounted.
- Systems are connected directly to the utility side of the meter.
- The value of energy produced by the installed system is realized by occupants through bill credits as a subscriber to a community renewable generation project.
- Participants, with the exception of non-residential anchor tenants, pay no upfront costs, and ongoing costs and fees are not to exceed 50% of the value of their share of energy generated by the system. See Section 5 of this Manual, Participant Savings Requirements, for specific calculations of savings.
- Projects are required to utilize the utility’s consolidated, single-billing option for participants.
- The project meets all consumer protection guidelines and other Program requirements.
- All Community Solar projects submitted after June 30, 2023, and selected for ILSFA funding, must comply with the requirements of the Prevailing Wage Act (820 ILCS 130), including paying workers no less than the applicable prevailing wage rate, notifying all subcontractors of this requirement, and posting notice of prevailing wage rates at the worksite.
- The project must demonstrate community engagement by:
  - Providing a narrative summary of efforts taken prior to the application to conduct community outreach, education, and recruitment.
  - Listing community-based organizations (as defined in Section 8.5.5 of the 2026 Long-Term Plan) the applicant has partnered with regarding the location of, development of, and participation in the project, as well as regarding the priorities and concerns of income-eligible community members. This should include letters from those organizations to verify the partnerships.
  - A public entity may qualify as a community-based organization for this purpose, but only if the public entity meets the following requirements:
    - The public entity must represent a municipality or county (or school district or park district) in a municipality or county in the bottom 25% of the state by population.
    - The public entity must certify that no local community-based organizations exist that are capable of filling this role.
    - The public entity must provide the same showing of robust community engagement as a non-public entity would be required to show.
    - Public entities that have failed to act as community-based partners in a past project certification would be ineligible.
- The public entity would be qualified as a “community-based organization” only in the context of one project application; the qualification would not be retained for a future project application (the public entity would need to demonstrate the same factors again). Finally, the public entity must provide ongoing reporting of its engagement approach, including public participation opportunities and disclosure of its approach to the project location selection (if applicable).

### 4.3.2 PARTICIPANT ELIGIBILITY

- No single subscriber can have a share greater than 40%.

- A single anchor tenant that is not an income-eligible household (as defined below) will be allowed.<sup>41</sup> In this instance, the application should describe that anchor tenant in detail. The anchor tenant's share will receive the applicable Illinois Shines program REC price, except for an income-eligible master-metered residential building acting as an anchor tenant, in which case RECs produced from the property's share of the project will be paid based on an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price.<sup>42</sup> The Approved Vendor must identify the anchor tenant at the time of the Part I application; if not, the project will not be allowed to add an anchor tenant after the close of the project submission window or relevant cure period.
- Other than the anchor tenant, all subscribers must be income-eligible households (defined as residential households that verify as 80% or less of AMI) to receive REC payments for those subscription shares. Any unsubscribed shares, or any shares subscribed by subscribers that are not income-eligible households (outside the single anchor tenant's subscription), as of one year after Energization will receive no REC payments, and Approved Vendors are not obligated to deliver those RECs.
- At least 50% of the total energy produced, excluding the anchor tenant's share (e.g., if the anchor tenant's share is 30% of the project capacity, then at least 35% of the total energy produced), must be allocated to income-eligible subscribers at the end of the first year after Energization.
- Subject to the requirements above, any retail electricity participant in that utility's territory can subscribe to the remaining shares.

ILSFA Community Solar projects can be awarded additional points during project selection based on the type of identified anchor tenant, as explained in the [Project Selection Protocol](#), including if the project is located in an IEC and/or EJC, if the anchor tenant is a non-profit or public facility, if the project commits to offering only no-cost offers, or if the anchor tenant is a Critical Service Provider.<sup>43</sup>

**NOTE: In the course of marketing, soliciting, and subscribing participants, Approved Vendors and/or their Designees, subcontractors, or agents may obtain confidential, proprietary, or otherwise generally private information from subscribers or potential subscribers.** This information may include the subscriber or potential subscriber's utility account number, utility account participant of record name, meter number, or other confidential information. Approved Vendors, Designees, subcontractors, and agents shall maintain the confidentiality and security of all such information received from subscribers and potential subscribers. Furthermore, Approved Vendors, Designees, subcontractors, and agents shall not release such information to any other person or entity without the written consent of the subscriber or potential subscriber. This restriction shall not apply to the necessary sharing of such information between an Approved Vendor and its Designees,

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<sup>41</sup> Note that for-profit entities are allowed as anchor tenants, and as such may have ownership shares that contribute toward the determination of a project being an Energy Sovereignty project for the purpose of project selection.

<sup>42</sup> Note that this represents a change from the first two Program Years when non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar price. The 2026 Long-Term Plan authorized the REC price calculated as the average corresponding ILSFA Community Solar and Illinois Shines Community Driven Community Solar REC prices.

<sup>43</sup> Note that for the purpose of the ILSFA Community Solar sub-program prioritization scoring, the Affordable Housing Provider is also included in the list of Critical Service Providers outlined in Section 4.4.

subcontractors, or agents in order to enroll a Community Solar subscriber, nor shall it apply to requests from the Program Administrator and/or the Agency as needed for program administration. Approved Vendors and Designees who violate this Program requirement, either directly or through the conduct of a subcontractor or agent, may be subject to disciplinary action, including possible suspension from the ILSFA program.

### 4.3.3 ENERGY SOVEREIGNTY ELIGIBILITY

Projects within the Community Solar sub-program may qualify as Energy Sovereignty projects if the system is owned by an eligible participant (defined to include income-eligible households, affordable housing owners, and non-profits)<sup>44</sup> or if over 50% of the total energy produced is proposed to be subscribed to by participants with ownership shares at the time of Part I application, and if the ownership agreements exhibit the following elements:

- For ownership model:
  - Lease or PPA contract between Approved Vendor and eligible participant, which includes a defined path to ownership of a majority or all portions of a Community Solar system by the eligible participant, or, for participant-owners, a portion of the system within seven years of Energization;<sup>45</sup> or
  - System purchase contract detailing the cost and timing of transfer of ownership of the eligible participant's share of the Community Solar system, transfer of warranties and insurance, and cost of ongoing monitoring, maintenance, and insurance.
- For the cooperative model, eligibility will be determined by reviewing the contractual relationships between the stakeholders to ensure that the contract(s):
  - Specify that subscription payments paid by participants are considered member fees for ownership shares in a Community Solar cooperative on behalf of eligible participants;
  - Provide details on financial benefits of ownership beyond electricity cost savings and procedures for selling ownership shares, including guarantees for allowing the selling of shares to other co-op members or to the co-op itself; and
  - Detail information on the cost and timing of the transfer of ownership, warranties, and insurance, the cost of ongoing monitoring, maintenance, and insurance, and, if applicable, include an agreement to pay a nominal fee to join the Community Solar cooperative.

## 4.4. Critical Service Providers

A qualified Critical Service Provider (CSP) is a non-profit or public entity that offers critical services to IECs or EICs. An approved CSP is a project requirement for the Non-Profit and Public Facilities sub-program or may be submitted as an anchor tenant for the Community Solar sub-program.

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<sup>44</sup> 20 ILCS 3855/1-56(b)(2)(A)(i) requires the Agency to reserve “a portion” of Illinois Solar for All funding “for projects that promote energy sovereignty through ownership of projects by low-income households, not-for-profit organizations providing services to low-income households, affordable housing owners, community cooperatives, or community-based limited liability companies providing services to low-income households.”

<sup>45</sup> Section 8.2.4 of the 2026 Long-Term Plan states that “Energy Sovereignty” means “the eligible low-income household or community organization having or being on a defined path to majority or full ownership of the photovoltaic generating facility, or in the case of a cooperative or community ownership model, a share or membership in the entity that owns the photovoltaic generating facility.”

All CSP requests must be approved by the Program Administrator no later than the time of Part I application. The request should be in the form of a letter to the Program Administrator, who will review such requests on a case-by-case basis.

Please note that only non-profits and public entities demonstrating a high degree of critical services provision to IECs or EJs specifically will be designated as CSPs. The list of CSPs contained in the Approved Vendor Manual was developed through a process that included stakeholder feedback and is intended to be a comprehensive list of appropriate organizational types. The Program Administrator must approve the request before an Approved Vendor submits a project application for that entity, or the application will be deemed ineligible for consideration. A qualified CSP is a non-profit or public entity that offers critical services to IECs or EJs, including:

- Advocacy organizations
- Affordable housing providers
- After-school providers
- Childcare centers
- Community centers
- Community financial institutions (such as credit unions or non-profit lenders)
- Disability service providers
- Domestic violence centers
- Fire stations and emergency medical services
- Family support agencies
- Food pantries
- Homeless shelters
- Hospitals, healthcare facilities, and clinics
- Housing support service providers
- Immigration service providers
- Job training and workforce development services
- Law/legal centers (non-profit providing pro-bono services to IECs or EJs)
- Libraries
- Affordable Housing Provider (for the purposes of ILSFA Community Solar scoring prioritization only)
- Mental and behavioral health facilities
- Places of worship
- Rehabilitation providers
- Senior centers
- Social service agencies (including unemployment and social security offices)
- Transitional or supportive housing (including for teens and LGBTQ+)
- Women's or children's shelters

Documentation of CSP status must be submitted by no later than the time of Part I application.

The Program Administrator can review other potential CSPs not listed on this list on a case-by-case basis. Those considering submitting as an "other" CSP are advised to submit their requests to the Program Administrator as early as possible; these requests will be carefully reviewed and may not be granted. Requirements for CSP requests are outlined below.

Note: Beginning with Program Year 2023-2024, carceral institutions, namely police stations, jails, prisons, and immigration detention centers, **will no longer be considered** as pre-qualified critical service providers based on comments received in both the October 2022 and June 2023 request for comment periods. Requests from individual institutions for consideration as a critical service provider may be submitted and will be evaluated in light of the comments received on this topic.

### 4.4.1 REQUIREMENTS FOR CRITICAL SERVICE PROVIDER REQUESTS

Letters requesting CSP status for non-profits and public entities must include all of the following:

- A description of the services provided by the non-profit or public entity that it asserts should be considered critical services and a description of the program(s) through which the non-profit or public entity offers those services. This should include the following, as applicable:
  - The nature of the critical services provided
  - The population served by the critical services (e.g., demographics, location, size)
  - The manner in which recipients access the critical services (i.e., application process, qualifications, enrollment period)
  - Who delivers the services (e.g., social worker, clinician, tradesperson, educator)
  - Whether the critical services are accessed onsite and, if not, where are the services provided/accessed (e.g., mobile services using trucks)
  - Critical services programs (goals, origin/date program started, partner agencies/entities and roles, outlook)
  - Portion of the entity’s work that is the provision of critical services. Please provide a description, if applicable, of the non-critical services provided by the entity.
  - Description of any costs to access services, and if there are differences in the cost of services for income-eligible recipients
- An explanation of how the proposed PV system will bolster the impact and delivery of critical services to low-income residents of IECs or EJCs. Explanations will not be considered passing if the PV system only impacts all residents generally; there must be a specific impact on low-income residents of IECs or EJCs. For example, deferment of raising utility costs for all residents in an IEC or EJC does not constitute critical services to low-income residents.
- Supporting documentation, such as relevant metrics demonstrating the impact of the critical services, as applicable.

Critical Service Provider requests will be scored utilizing the following rubric. The rubric is PASS/FAIL; thus, all items in the rubric must be met for an entity to be considered a Critical Service Provider.

Criteria	Pass/Fail	Expected Indicators of a Passing Response
Description of the services provided by the entity is asserted as critical.		A passing response clearly identifies and describes specific services provided by the entity. Sufficient detail about each critical service is provided, and it must include specific examples or evidence supporting the assertion that these services are critical to income-eligible households.

Details of population(s) served by critical services (e.g., demographics, location, size).		Beyond generalizations, a passing response shows specifics about the demographics, location, and size of low-income populations receiving critical services. Supporting data must be within the past two years, relevant, and directly linked to the population details provided in the description.
Description of how recipients access the critical services (i.e., enrollment period, application process, qualifications, organizational partnerships).		A passing response includes examples of open enrollment periods, deadlines, or recurring application cycles that explain how the services are accessed. If recipients are referred by external entities, the nature of these partnerships and their impact on service accessibility must be discussed.
Description of who in the entity delivers the critical services.		A passing response names the specific roles or professions within the entity that deliver the critical services (e.g., social workers, clinicians, tradespeople, educators, or any other relevant roles). Information is included about the qualifications, expertise, and training that impact the effectiveness of the critical services for income-eligible populations.
Historical details and goals of any programs for delivering critical services.		A passing response details the goals, origin (e.g., the date the program started), and any partnerships with other entities that participate in delivering critical services to income-eligible populations.
Description of whether the critical services are accessed onsite, and if not, where the services are provided (e.g., mobile services, online).		A passing response clearly identifies and names specific services that are accessed onsite. If services are not accessed onsite, the response must clearly state where these services are provided.
What portion of the entity's work is critical services? If applicable, describe any other non-critical services.		A passing response demonstrates that at least 50% of the entity's work is critical services, specifically to income-eligible residents. Any supporting detail confirming this will be considered. The response must provide a description, if applicable, of the non-critical services provided by the entity.
Description of cost to access critical services. Include assistance or considerations available for income-eligible recipients to access the critical services.		A passing response details normal costs for services and demonstrates there are options to reduce or eliminate costs for individuals with financial needs. Examples may include a sliding scale or income-based pricing models. It may also discuss outreach channels, community partnerships, or other means to ensure that eligible individuals are aware of and able to access available services.
Explanation of how the proposed photovoltaic (PV) system will enhance the entity's impact and delivery of critical services to income-eligible residents of Income-Eligible		A passing response shows that the proposed photovoltaic (PV) system clearly benefits the entity's impact and delivery of critical services to income-eligible residents of IECs or EJC. Responses may include the financial, environmental, and community impact of the PV system. The cost savings

Communities (IECs) or Environmental Justice Communities (EJCs).		may be redirected toward providing more critical services to low-income populations or ensuring that the services can be delivered with greater reliability.
Demonstration of impact of critical services on low-income populations.		A passing response demonstrates that services have positively affected the lives or circumstances of low-income individuals. The entity’s impact on low-income populations is demonstrated through a combination of quantitative and qualitative data, testimonials, and feedback mechanisms. It also avoids generalizations and provides a precise understanding of the targeted demographic’s needs.

In order to determine if the entity qualifies as a CSP, the Program Administrator will review the information provided in the request letter and accompanying materials, utilizing a scoring rubric. The Program Administrator’s determination will be based on whether the prospective entity provides services that improve living conditions, financial status, environmental and health status, and other social welfare indicators. The review will consider the services offered, their alignment with and ability to meet identified needs, how accessible they are, and the organization’s role and impact in delivering the critical services. In general, critical services should represent a majority of the activities performed by the organization. Where there are gaps in the information provided or questions about the request, the Program Administrator will send a written request for clarification.

The letter should be submitted on the letterhead of the non-profit or public entity and signed by an officer of the organization. It may be submitted directly by the entity or by an Approved Vendor with which the entity is working. Please submit the letter to the Program Administrator at least 30 calendar days in advance of a sub-program project submission window opening to allow for adequate review time. Once a letter is received, the Program Administrator will either approve the application or communicate any deficiencies to the requesting entity within 10 business days. However, a failure to complete the notification of deficiencies within 10 business days shall not be deemed an approval. If the CSP request is denied, an appeal of that determination may be made to the IPA following the process in Section 1.4 of this Manual.

## 4.5 Participant Referrals

A stakeholder engagement process completed in early 2021 informed the creation of a referral process for interested one- to four- unit building owners. An updated process was proposed as part of the 2026 Long-Term Plan to address the referral process’s limited success. The Agency proposed to “update and expand the existing referral process into a more robust Participant Pipeline serving both the Residential Solar (Small) and Community Solar sub-programs, with the intent to have a Program-maintained list of customers who have been income verified.”<sup>46</sup> The Agency will seek additional stakeholder feedback before finalizing the updated Participant Referral Process.

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<sup>46</sup> Section 8.5.5 of the 2026 Long-Term Renewable Resources Procurement Plan

## 5. Participant Savings Requirements

ILSFA requires that the estimated Percentage Savings for participants must be at least 50%, as outlined by the calculations below (which do not account for the LIDR). However, if the owner of a project in the Non-Profit and Public Facilities sub-program is applying for any of the federal tax credits available under the Inflation Reduction Act of 2022 in relation to the project installation,<sup>47</sup> then the savings level for the participating host of the project must be 65% of energy value rather than 50%. All Residential Solar (Small and Large) and Non-Profit and Public Facilities projects and shares of Community Solar projects that are eligible to receive an ILSFA REC payment must meet the 50% savings requirement or greater, as noted above. Non-eligible participants, such as subscribers whose household income levels exceed 80% AMI or non-anchor business participants, are not eligible for ILSFA REC payments, and their project participation is not subject to the 50% savings requirement though other consumer protections still apply.

The method used for calculating savings will vary depending on several factors, including the contract terms, system design, participant rates, the applicable net metering tariff, as well as whether participants receive benefits through net metering or indirectly through other means (as for master-metered multifamily buildings). The savings dollars and percentages, Year 1 and over the term will be automatically calculated during the generation of the Disclosure Form for the Residential Solar (Small), Non-Profit and Public Facilities, and Community Solar sub-programs. The Disclosure Form automatically uses 25 years for the long-term savings for purchases; for leases and PPAs, it uses the length of the lease or PPA. ILSFA requirements provide that leases and PPAs with a buyout option within the first 15 years, may calculate the long-term savings over 25 years.<sup>48</sup> The Program Administrator is considering updating Disclosure Forms for leases and PPAs with a buyout option in the first 15 years or for Energy Sovereignty projects in the 2026-2027 Program Year to automatically calculate long-term savings over 25 years. An Approved Vendor who wishes to use this option ahead of Disclosure Form updates should contact their Approved Vendor Manager for additional Program guidance.

Note that due to the Low-Income Discount Rate (discussed below), Disclosure Forms for Residential Solar (Small) projects in affected utility territories will no longer include savings estimates on the PDF that is generated for the customer. However, the savings calculations will still be made in the Portal using the methodology outlined in this chapter, for use by the Program Administrator in ensuring compliance with Program requirements.

Residential Solar (Large) savings calculations are dependent on metering type. In a master metered building (no tenant meters), or a multi-metered building (tenants have meters) where the generation is connected behind only the building meter, the generation is behind a single meter. The lease, PPA, or purchase cost of the system is compared to the Total Value of Electricity resulting from the generation at that meter (not accounting for the LIDR, if applicable). They are used to calculate the savings on the Disclosure Form. Then, the tangible benefits review is used to evaluate the dispersion of the savings to the tenants. There is another possibility where it is a multi-metered building (tenants have meters), and the building owner wants to operate the solar project "like" a Community Solar project and have the utility directly provide the credits to the tenant accounts. In this case the Community Solar Disclosure Forms would be used to calculate the savings.

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<sup>47</sup> A list of potential tax credits for which Non-Profit and Public Facilities sub-program projects may be able to apply is available in IRS Publication 5817-G, [Clean Energy Tax Incentives: Elective Pay Eligible Tax Credits](#).

<sup>48</sup> All Residential Solar and Non-Profit and Public Facility lease and PPA contracts must allow the customer to purchase the solar project if the customer moves; compliance with this requirement does not count as a transfer of ownership within the first 15 years for purposes of determining the term for the savings requirement.

Savings in dollars are calculated by subtracting the total costs and fees from the Total Value of Electricity generated by the system.

If the solar project will be applying for the ComEd or Ameren Illinois distributed generation rebate, *and the customer will retain the rebate payment*, this will be added to the Total Value of Electricity before subtracting the costs and fees. This is added in both the Year 1 and over-the-term calculations.

If the system includes energy storage, the cost of the energy storage system must be included in the cost of the system. If the solar project will be applying for the ComEd or Ameren energy storage (battery) rebate, *and the customer will retain the rebate payment*, this rebate will be added to the Total Value of Electricity. However, any incentives beyond the ComEd or Ameren distributed generation or energy storage rebates, such as federal incentive tax credits, will not be included in these savings calculations. The cost for energy storage can be added by inclusion in the loan payment for a Purchase or the lease payment for a Lease, being listed as a single lump sum fee for any type, or, in the case of a PPA or Lease, as a recurring fee amount. These are added in both the Year 1 and over-the-term calculations. If the cost of the energy storage system is not included in the costs and fees, then the rebate cannot be reported on the Disclosure Form as being kept by the customer, even if it is.

$$\text{Utility Rebates Kept by Customer} + \text{Total Value of Electricity} - \text{Total Costs and Fees} = \text{Savings Dollars}$$

The Year 1 Total Value of Electricity is calculated by using the expected first-year Annual Generation (kWh) and multiplying it by the Blended Energy Rate (\$/kWh). The Blended Energy Rate is an estimate of the average value of electricity generated by the solar project, taking into account both the value of electricity when it is used directly onsite (the full retail rate) and the value of electricity when it is sent back to the grid (supply rate or net metering rate), but not accounting for the customer's LIDR.<sup>49</sup> The Blended Energy Rate can be found by using the following formula:

$$\begin{aligned} & (\text{Onsite Use Assumption \%} * \text{Full Retail Rate } \$/\text{kWh}) \\ & + \\ & ((1 - \text{Onsite Use Assumption \%}) * \text{Supply Only Rate } \$/\text{kWh})^{50} \end{aligned}$$

For each year in the term, the Blended Energy Rate is increased by 1.7%, and the Annual Generation is decreased by 0.5%. These values are multiplied together to get an estimated dollar value of the yearly generation. The sum of these annual estimates is the Total Value of Electricity over the term. The Disclosure Form automatically uses 25 years for the term for purchases, and for leases and PPAs, uses the length of the lease or PPA. ILSFA requirements provide that leases and PPAs with a buyout option within the first 15 years may calculate the long-term savings

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<sup>49</sup> Note that when generating a Disclosure Form in the Portal, the user will be prompted to choose either Standard Blended Rate or Custom Value of Electricity, which will determine the details for the Full Retail and Supply Only Rates. For more information on the details of each option, please visit [Utility Rate Guidance for Disclosure Forms](#), in the Resource Library under "Approved Vendor Training."

<sup>50</sup> Note that when generating a Disclosure Form in the Portal, the user will be prompted to choose either Standard Blended Rate or Custom Value of Electricity. If the user selects Customer Value of Electricity, they will be prompted to enter an estimate of the percentage of electricity from the solar project that will be used directly onsite by the customer (as opposed to being sent back to the grid). For more information on estimating the percentage of electricity used directly onsite, please visit [How to Estimate Percentage of Electricity Used DIRECTLY Onsite](#) in the Resource Library under "Approved Vendor Training."

over 25 years.<sup>51</sup> An Approved Vendor who wishes to use this option should contact their Approved Vendor Manager for additional Program guidance.

The Savings Dollars are then divided by the Total Value of Electricity to establish a Percentage Savings, which must be at least 50% of the Total Value of Electricity (with the Non-Profit and Public Facilities applying for any of the federal tax credits and Residential Solar (Large) exceptions noted below). The Program Administrator reviews the Disclosure Forms to ensure that savings requirements are met. As further discussed below, these calculations do not account for a low-income discount rate, which may reduce the economic value of electricity generated by a solar project.

$$\frac{\text{Savings Dollars}}{\text{Total Value of Electricity}} = \text{Savings \%}$$

### 5.1.1 LOW-INCOME DISCOUNT RATES

As introduced in Section 1.3.3.1, Section 9-241(d) of the Public Utilities Act directed the ICC to “conduct a comprehensive study to assess whether low-income discount rates for electric and natural gas residential customers are appropriate and the potential design and implementation of any such rates.”<sup>52</sup> The ICC determined that electric utilities with more than 3,000,000 residential delivery service customers in Illinois, or combination electric and gas utilities with more than 500,000 residential delivery service customers in Illinois, or gas utilities with more than 100,000 residential delivery service customers in Illinois should offer a Low-Income Discount Rate (LIDR).<sup>53</sup> Discount levels are based on household income and can be updated annually.

With the 2026-2027 Program Year, ILSFA will be prioritizing Residential Solar (Small) and Community Solar projects with no-cost offers through existing selection mechanisms and will be introducing an additional review of Residential Solar (Small) projects that have customer costs. Offers will not be allowed if the customer is expected to be worse off economically than if they had the LIDR but no solar. Approved Vendors will be able to work with their Approved Vendor Managers before a project is submitted to check that the offer not only meets the savings requirement as it currently exists (which does not account for the LIDR), but that the offer with the LIDR is also not a greater out-of-pocket cost than the customer only having the LIDR apply. Systems with no-cost offers to the customer will not need this additional check.

Changing the formula to incorporate the LIDR into the Disclosure Form savings calculation would add complexity to an already complex concept for customers, and still not provide reliable future savings predictions due to potential changes in the customer’s LIDR. Therefore, the Agency and Program Administrator are not proposing to change the formula for residential savings calculations in the Disclosure Forms for the 2026-2027 Program Year. Instead, the savings estimates will no longer be presented on Disclosure Forms for Residential Solar (Small) projects in affected utility territories in order to avoid presenting information to the customer that may not be accurate. The Program will encourage no-cost offers and for any Residential Solar (Small) projects with customer costs, and will perform an additional check to confirm that the offer is not expected to result in greater out-of-pocket costs to the

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<sup>51</sup> All Residential and Non-Profit and Public Facility lease and PPA contracts must allow the customer to purchase the solar project if the customer moves; compliance with this requirement does not count as a transfer of ownership within the first 15 years for purposes of determining the term for the savings requirement.

<sup>52</sup> 220 ILCS 5/9-241(d).

<sup>53</sup> Illinois Commerce Commission [Low-Income Discount Rate Study Report](#) to the Illinois General Assembly

customer. The Program is open to considering alternative approaches. The IPA and Program Administrator will monitor the impacts of LIDR implementation and may propose further Program adjustments.

## 5.1. Term of Savings

The savings will be calculated twice:

- for the first year and,
- for the term of either:
  - the participant's contract with the installer or Approved Vendor for a PPA or Lease without a transfer of ownership in the first 15 years; or
  - for 25 years for a purchase, a PPA, or Lease with optional or required transfer of ownership within 15 years.<sup>54</sup>

Both calculations must meet the requirement that total costs and fees are no more than 50% of the energy value prior to the application of the customer's LIDR, except in the cases of:

- Non-Profit or Public Facilities projects where the project's owner is ineligible for the elective pay option under the Inflation Reduction Act of 2022,<sup>55</sup> the system is provided to the participant pursuant to a lease or PPA, and the project owner retains ownership of any of the tax credits available under the Inflation Reduction Act of 2022, in which case the first-year and contract term savings level for the participating host must both be 65% of the energy value;
- 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. In such cases, the participant's first-year savings may be less than 65% as long as the calculation of that participant's expected full-term savings demonstrates that the 65% savings requirement for projects eligible for federal tax credits available under the Inflation Reduction Act of 2022 would be met through overall savings applied across the full 15 years of the REC Delivery Contract; or
- Residential Solar (Large) projects (multifamily projects of five or more units) where the participant purchases and takes ownership of the full or majority installation equity of the system. In such cases, the participant's first-year savings may be less than 50% as long as the calculation of that participant's expected full-term savings demonstrates that this requirement would be met through overall savings applied across the full 15 years of the REC delivery contract.

For example, if a PPA term is 20 years with no option to transfer ownership within the first 15 years, First Year Savings is calculated using total costs and fees incurred in the first year and Total Energy Value of Electricity projected for the first year. Savings are then calculated using total costs and fees and Total Value of Electricity projected for the 20-year duration of the PPA. Both savings and costs are calculated on the Disclosure Form based on inputs from the Approved Vendor, but do not incorporate the customer's Low-Income Discount Rate.

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<sup>54</sup> All Residential and Non-Profit and Public Facility lease and PPA contracts must allow the customer to purchase the solar project if the customer moves; compliance with this requirement does not count as a transfer of ownership within the first 15 years for purposes of determining the term for the savings requirement.

<sup>55</sup> For more information on elective pay, also known as direct pay, see [IRS Publication 5817, Elective Pay Overview](#).

However, for system purchase or a PPA or lease that includes an option to transfer ownership before the end of the first 15 years, the Total Value of Electricity can be extended to the life of the system, which is assumed to be 25 years. Because all Energy Sovereignty projects require the customer to take ownership within the first seven years, all Energy Sovereignty projects can use the full 25 years to demonstrate that the savings requirements are met. This calculation will not be done automatically on the Disclosure Form. An Approved Vendor who wishes to use this option should contact their Approved Vendor Manager for additional Program guidance. For more information about Energy Sovereignty, see the applicable sub-program section in Section 2. Any additional cost to buy the system would be added, as well.

## 5.2. Calculating Total Costs and Fees

Total Costs and Fees are calculated by first multiplying a participant's total monthly (or other periodic) payments by the frequency of payments during the first year and then over the entire period of the agreement. For a PPA, this would mean multiplying the projected number of kWhs produced by the agreed purchase rate. For a lease agreement, this would mean multiplying the lease payment by the frequency of payments in the first year and again for the term of the lease. A system purchase using a loan or installment agreement would work in the same way. In all cases, any participant payment rate escalation, discussed in Section 5.3 below, must be taken into account.

When generating a Disclosure Form, the user will be prompted to enter Fees that *will* apply, both recurring and non-recurring, and Other Fees that *may* apply. Any non-recurring fees that *will* apply (which cannot be incurred prior to Energization), like a loan origination fee or an automated clearinghouse fee, are added to the first-year total if incurred during that time, as well as the full-term total. Recurring fees that *will* apply will be added according to their recurrence. In generating the Disclosure Form, the user is prompted to enter the total fees that *will* apply in the first year to ensure those fees are correctly included in the Year One calculations. Late payment or returned check fees are examples of Fees that *may* apply and are not included in the calculation.

Community Solar projects that qualify as Energy Sovereignty projects may charge a nominal one-time fee to participants to join the Community Solar project, either by the Community Solar cooperative or project owner.

## 5.3. Escalation and Degradation Rates

- A standard annual production degradation rate of 0.5% is used for all calculations.
- An annual energy rate escalation rate of 1.7% is used.
- The annual participant payment escalation can be no more than 1.7%.

## 5.4. Savings Calculations

As mentioned above in the introduction to Chapter 5, changes are not being proposed to incorporate the customer's LIDR into the calculation of savings for the 2026-2027 Program Year, though it's notable that the LIDR reduces the value of electricity from a solar project. This is because the valuation for electricity from a solar project is based in part on how much the customer would *otherwise* pay for electricity, and the LIDR reduces what the customer pays for electricity.

For example, we can calculate savings for a PPA agreement in which the participant pays \$0.05 per kWh over 15 years. Assume the project would produce 12,000 kWh in the first year (this would be true for a size of approximately 9 kW and a capacity factor of approximately 15%).

### First-year savings:

- Total Costs: 12,000 kWh x \$0.05 = \$600.00

- Total Value of Electricity: 12,000 kWh x \$0.124856 = \$1497.60
- Total Savings Dollars: \$1497.60 - \$600.00 = \$897.00
- Total Savings %: \$897.00 ÷ \$1497.60 = 59.9%

Below is an example of the same project for a customer that is receiving a LIDR from their utility. While they maintain the same usage, the discount rate in this example reduces the price that the customer is billed for by the utility. Therefore, it reduces the total value of electricity and the total savings % which would disqualify the project if the LIDR was incorporated into the ILSFA savings calculations.. Impacts of ComEd’s LIDRs on customer bills can range from 5% to 80% reduction in their bill depending on several factors including income level and number of household members. The example below illustrates a 50% reduction in price.

Total Costs: 12,000 kWh x \$0.05 = \$600.00

Total value of Electricity for Customer on LIDR Credit: 12,000 kWh x \$0.0624 = \$748.80

- Total Savings Dollars for Customer on LIDR Credit: \$748.80 - \$600.00 = \$148.80
- Total Savings % seen by Customer on LIDR Credit: \$148.80 ÷ \$748.80 = 19.9%

**Full-term savings:** Assuming a 15-year contract term, 0.5% annual production degradation, 1.7% annual energy rate escalation, and 1.0% annual participant rate escalation:

- Total Costs: 43,459 kWh with an initial rate of \$0.0557 yields \$2,329.66
- Total Value of Electricity: 43,459 kWh with an initial rate of \$0.1248 yields \$6,109.47
- Total Savings Dollars: \$6,109.47 - \$2,329.66 = \$3,779.81

Total Savings %: \$3,779.81 ÷ \$6,109.47 = **61.9%**. If, for example, the PPA included an early transfer of ownership within the 15-year term, the Total Value of Electricity is extended to the life of the system (i.e., 25 years). Any additional cost to buy the system would be added as well. For example:

**Full-term savings:** Assuming a 15-year contract term, 0.5% annual production degradation, 1.7% energy rate escalation, and 1.0% participant rate escalation, with a \$1 system transfer at the end of the sixth year:

- Total Costs: (43,459 kWh with initial rate of \$0.05) + \$1 system transfer of ownership yields **\$2,228.76**
- Total Value of Electricity: 70,668 kWh with an initial rate of \$0.1248 yields **\$9,200.46**
- Total Savings Dollars: \$9,200.46 - \$2,228.76= **\$6,971.70**
- Total Savings %: \$6,971.70 ÷ \$9,200.46 = **75.8%**

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<sup>56</sup> A sample rate is used here (and in the full-term savings examples below) to demonstrate potential savings. Approved Vendors should use the rate given in the Disclosure Form based on the utility territory in which the project is located or, for customers using an Alternative Retail Electric Supplier (“ARES”), an average rate based on 12 months of customer bills may be used. For Non-Profit and Public Facilities participants, the average rate based on 12 months of customer bills **must** be used. Where a facility does not have a year of electric usage history (e.g., a new building), the Approved Vendor should use the rate of the new service and estimate kWh usage from the facility’s architect/engineer. The Approved Vendor should provide the methodology for load estimation in the project application.

<sup>57</sup> \$0.05 here and \$0.1248 in the next line (as well as the same figures included in the “full term savings” calculation below) are first-year values before escalation; the actual calculation that results in \$2,329.66 would be based on multiplying 43,459 kWh by the average customer rate over the 15-year period in question (approximately the Year 8 value of \$0.0536 shown in Table 5.1).

**TABLE . 5 . 1 . COST AND SAVINGS CALCULATION EXAMPLE**

Year	Annual kWh	Energy Rate per kWh	Energy Value	Customer Rate per kWh	Customer Payments	Customer Savings \$	Customer Savings %
<u>1</u>	<u>3,000</u>	<u>\$0.1248</u>	<u>\$374.40</u>	<u>\$0.0500</u>	<u>\$150.00</u>	<u>\$224.40</u>	<u>59.9%</u>
<u>2</u>	<u>2,985</u>	<u>\$0.1269</u>	<u>\$378.86</u>	<u>\$0.0505</u>	<u>\$150.74</u>	<u>\$228.12</u>	<u>60.2%</u>
<u>3</u>	<u>2,970</u>	<u>\$0.1291</u>	<u>\$383.38</u>	<u>\$0.0510</u>	<u>\$151.49</u>	<u>\$231.89</u>	<u>60.5%</u>
<u>4</u>	<u>2,955</u>	<u>\$0.1313</u>	<u>\$387.94</u>	<u>\$0.0515</u>	<u>\$152.24</u>	<u>\$235.70</u>	<u>60.8%</u>
<u>5</u>	<u>2,940</u>	<u>\$0.1335</u>	<u>\$392.57</u>	<u>\$0.0520</u>	<u>\$152.99</u>	<u>\$239.57</u>	<u>61.0%</u>
<u>6</u>	<u>2,926</u>	<u>\$0.1358</u>	<u>\$397.24</u>	<u>\$0.0526</u>	<u>\$153.75</u>	<u>\$243.49</u>	<u>61.3%</u>
<u>7</u>	<u>2,911</u>	<u>\$0.1381</u>	<u>\$401.98</u>	<u>\$0.0531</u>	<u>\$154.51</u>	<u>\$247.47</u>	<u>61.6%</u>
<u>8</u>	<u>2,897</u>	<u>\$0.1404</u>	<u>\$406.77</u>	<u>\$0.0536</u>	<u>\$155.28</u>	<u>\$251.49</u>	<u>61.8%</u>
<u>9</u>	<u>2,882</u>	<u>\$0.1428</u>	<u>\$411.61</u>	<u>\$0.0541</u>	<u>\$156.04</u>	<u>\$255.57</u>	<u>62.1%</u>
<u>10</u>	<u>2,868</u>	<u>\$0.1452</u>	<u>\$416.52</u>	<u>\$0.0547</u>	<u>\$156.82</u>	<u>\$259.70</u>	<u>62.4%</u>
<u>11</u>	<u>2,853</u>	<u>\$0.1477</u>	<u>\$421.48</u>	<u>\$0.0552</u>	<u>\$157.59</u>	<u>\$263.89</u>	<u>62.6%</u>
<u>12</u>	<u>2,839</u>	<u>\$0.1502</u>	<u>\$426.50</u>	<u>\$0.0558</u>	<u>\$158.37</u>	<u>\$268.13</u>	<u>62.9%</u>
<u>13</u>	<u>2,825</u>	<u>\$0.1528</u>	<u>\$431.58</u>	<u>\$0.0563</u>	<u>\$159.16</u>	<u>\$272.43</u>	<u>63.1%</u>
<u>14</u>	<u>2,811</u>	<u>\$0.1554</u>	<u>\$436.73</u>	<u>\$0.0569</u>	<u>\$159.94</u>	<u>\$276.78</u>	<u>63.4%</u>
<u>15</u>	<u>2,797</u>	<u>\$0.1580</u>	<u>\$441.93</u>	<u>\$0.0575</u>	<u>\$160.74</u>	<u>\$281.19</u>	<u>63.6%</u>
			<b><u>\$6,109.47</u></b>		<b><u>\$2,329.66</u></b>	<b><u>\$3,779.81</u></b>	<b><u>61.9%</u></b>
<b><u>Ownership Transfer Fee at End of Contract Term</u></b>				<b><u>\$1.00</u></b>			
<u>16</u>	<u>2,783</u>	<u>\$0.1607</u>	<u>\$447.19</u>	<u>\$0.0580</u>	<u>\$0.00</u>	<u>\$447.19</u>	<u>100.0%</u>
<u>17</u>	<u>2,769</u>	<u>\$0.1634</u>	<u>\$452.52</u>	<u>\$0.0586</u>	<u>\$0.00</u>	<u>\$452.52</u>	<u>100.0%</u>
<u>18</u>	<u>2,755</u>	<u>\$0.1662</u>	<u>\$457.91</u>	<u>\$0.0592</u>	<u>\$0.00</u>	<u>\$457.91</u>	<u>100.0%</u>
<u>19</u>	<u>2,741</u>	<u>\$0.1690</u>	<u>\$463.37</u>	<u>\$0.0598</u>	<u>\$0.00</u>	<u>\$463.37</u>	<u>100.0%</u>
<u>20</u>	<u>2,727</u>	<u>\$0.1719</u>	<u>\$468.89</u>	<u>\$0.0604</u>	<u>\$0.00</u>	<u>\$468.89</u>	<u>100.0%</u>
<u>21</u>	<u>2,714</u>	<u>\$0.1748</u>	<u>\$474.48</u>	<u>\$0.0610</u>	<u>\$0.00</u>	<u>\$474.48</u>	<u>100.0%</u>
<u>22</u>	<u>2,700</u>	<u>\$0.1778</u>	<u>\$480.13</u>	<u>\$0.0616</u>	<u>\$0.00</u>	<u>\$480.13</u>	<u>100.0%</u>

<u>23</u>	<u>2,687</u>	<u>\$0.1808</u>	<u>\$485.85</u>	<u>\$0.0622</u>	<u>\$0.00</u>	<u>\$485.85</u>	<u>100.0%</u>
<u>24</u>	<u>2,673</u>	<u>\$0.1839</u>	<u>\$491.64</u>	<u>\$0.0629</u>	<u>\$0.00</u>	<u>\$491.64</u>	<u>100.0%</u>
<u>25</u>	<u>2,660</u>	<u>\$0.1870</u>	<u>\$497.50</u>	<u>\$0.0635</u>	<u>\$0.00</u>	<u>\$497.50</u>	<u>100.0%</u>
			<b><u>\$10,828.97</u></b>		<b><u>\$2,330.66</u></b>	<b><u>\$8,498.31</u></b>	<b><u>78.5%</u></b>

## 5.5. Determining the Energy Rate

A critical factor in determining participant savings is the participant’s Blended Rate. For Ameren Illinois, ComEd, and MidAmerican residential utility supply customers, the user may select either the Standard Blended Rate or Custom Value of Electricity when generating the Disclosure Form. If the user selects Standard Blended Rate, the user can choose between Basic or TOU/hourly rates. Then, the Blended Rate will be calculated based on the Full Retail and Supply Only rates for the utility territory and one of three default percentages of electricity used directly onsite values. The default percentage of electricity is based on the annual generation and customer usage and whether the project includes an energy storage system (battery), as outlined in the table below.

Percentage of Annual Electricity Usage Offset by Solar Project Estimated First-Year Generation Divided by Estimated Annual Customer Electricity Usage	Battery	Percentage of Electricity from Project Used Directly Onsite Determined Based on Offset % and Battery (Yes/No)
>=80%	No	55%
<80%	No	75%
>=80%	Yes	75%
<80%	Yes	95%

For these customers, a Custom Value of Electricity can be optionally selected to allow a custom percentage of the electricity used directly onsite value. For residential customers in other utility, municipal, or co-op territories, or with an ARES supply, and all Non-Profit and Public Facilities, a Custom Value of Electricity must be used. The Blended Rate calculated for a Custom Value of Electricity will be based on the Full Retail and Supply Only rates blended by the percentage of electricity used directly onsite. The Approved Vendor will need to enter those three values, and the Disclosure Form will calculate and use that blended rate for the savings calculations. The Supply Only rate will either be the utility’s supply-only rate or the rate that the customer will get credited for electricity sent back to the grid if there is no supply-only rate. The full retail and supply-only rates from 12 months of customer bills may be used. Where a facility does not have a year of electric usage history (e.g., a new building), the Approved Vendor should use the rates for the new service for the estimate of kWh usage from the facility’s architect/engineer or another source, such as a utility estimate.

The Program Administrator will update the rates used for the Standard Blended Rate as needed based on the utilities’ rate update schedules. The Program Administrator will announce any rate updates.

When establishing the Full Retail and Supply Only Rates using participant bills, the average of 12 consecutive months of participant bills within the last two years should be used. The Full Retail Rate should include all volumetric charges (costs per kWh), including Supply, Transmission, Delivery, and volumetric taxes that are included in the utility's net metering crediting rate (some municipalities and co-ops may not offer full retail rate net metering). The sum of these cost components should be averaged per kWh over this 12-month period to get the average participant rate. Non-volumetric taxes and fees should not be included. The Supply Only Rate should only include volumetric charges (costs per kWh) for Supply and Transmission.

For all Community Solar participants, the utility's Price to Compare (PTC) rate is used and provided by the portal. For multifamily buildings that are multi-metered, with bill credits sent to tenants' electricity bills, the Net Metering Rate used should be calculated in the same way as Community Solar, and the utility PTC rate should be used. For master-metered buildings or for multifamily buildings where the installation will serve only the common load, the Full Retail and Supply Only rates, together with the percentage of electricity used DIRECTLY onsite, will be used to create the Blended Rate that will be used in calculating the savings.

In general, the intent is that an accurate projection of the participant's Blended Rate should be used in calculating bill credits and savings.

## 5.6. Tangible Benefits and Value to Participants

In most instances, the value realized by Program participants will be through net metering in the various ways described above. The value changes based on their rate, the type of net metering, low-income discount rates, and other system factors, but is generally calculated as described above. In instances where Residential Solar projects are installed on master-metered buildings, the property owner installs the system and receives net metering benefits on behalf of all tenants/participants and must demonstrate that at least half of the Total Energy Value received is being passed on to all tenants. Note that when an income-eligible master-metered building is a Community Solar anchor tenant, the property owner is required to demonstrate that the required savings value is being passed on to all tenants. A master-metered building may participate as an anchor tenant and receive an alternative anchor tenant REC price found by averaging the ILSFA Low-Income Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price.<sup>58</sup>

When Residential Solar projects are installed on master-metered buildings or income-eligible buildings with master-metered units subscribe as an anchor tenant in a Community Solar project, the value is calculated in the same way as any other Residential Solar project. However, the benefits realized by tenants/participants are indirect. The most common ways this can be passed onto participants is through lowered rents, stabilized rents, or other services to tenants. In these situations, the Approved Vendor should consult with the Approved Vendor Manager to ensure that the provision of tangible benefits is verifiable and easily managed. The proposed tangible benefits should be quantifiable and must not have been possible without the savings generated by the PV system. This will be verified through supporting documentation such as dated and paid invoices/bills that tie back to leases, scopes of work, services, or goods that comprise the tangible benefits provided to tenants.

If a property realizes \$10,000 annually in net metering value, at least \$5,000 of that must be passed on to tenants. If, for example, the property owner's savings are \$6,000, only \$5,000 must be passed onto tenants, with the

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<sup>58</sup> Master-metered buildings no longer count as income-eligible non-anchor tenant subscribers to ILSFA Community Solar projects. During the 2022-2023 and 2023-2024 Program Years, master-metered affordable housing buildings were previously considered income-eligible residential households for the purpose of Community Solar subscribership and received the ILSFA Low-Income Community Solar REC price for their subscription share.

remaining \$1,000 being savings realized by the property owner. If the property has ten tenants, each must see \$500 in value annually or approximately \$42 per month. This can be demonstrated in several ways and is not limited by the examples below:

- Lease agreements can show a reduction in monthly payments by \$42 per month.
- Any rent increases can be forgone in subsequent years. The property owner should provide data on the average dollar amount of increases in recent years to support and quantify subsequent rent freezes or reduced rent increases.
- The property owner can provide other services, like internet service, free laundry, or other services valued at \$42 per tenant per month or more. Documentation will need to be submitted that details the services being offered, their value, and the dates of the services.
- Where tenant rents and/or utilities are subsidized based on a percentage of income (for example, HUD Section 8 or other programs that provide subsidies in a way that ensures housing and utility costs are 30% of income), the property owner should find ways to pass value to tenants that do not affect rent or utility payments to ensure the benefits are realized directly.

To encourage Energy Sovereignty, an additional \$10 per REC will be added for onsite projects that result in ownership by the participant, such as through an early ownership transfer of a lease or PPA.

These incentive payments are intended to be sufficient to provide tangible economic benefits to participants by enabling project developers to eliminate upfront costs to the participants for the installation of photovoltaic projects.

## 6. Project and Participant Verification

ILSFA requires that data for all Program participants be collected and shared with the Program Administrator. This includes all property owners, single-family occupants, tenants of multifamily properties counting toward eligibility (minimum is 50%), all subscribers to Community Solar projects, and all non-profit or public entities receiving benefits through ILSFA-Energized systems. A Certification and Consent Form, the affidavit whereby the applicant certifies that their income does not exceed 80% AMI, is required for each household. This data will be used for validation of eligibility and for measuring Program performance, including Program reporting and periodic participant satisfaction surveys. Applicant data is captured through the [Approved Vendor Portal](#) as part of the project approval process during Part I of the project application. Subscriber data for Community Solar projects is submitted during Part II. Annual submissions are also required for additional subscriber data and qualified subscriber shares to be updated.

Prospective participants may also work with the Program Administrator to complete a Certification and Consent form and determine income eligibility. Prospective participants verified as income-eligible will receive an Income Verification Approval Letter.

Approved Vendors working with prospective participants who have been verified as income-eligible through the Program Administrator will accept the prospective participant's Income Verification Approval Letter rather than the documentation described below. The Income Verification Approval Letter will need to be uploaded as described in section 8.5: Part I Project Approval: Customer Data.

### 6.1 Verification Process Overview

The verification process differs for each sub-program. Residential Solar and Community Solar projects require income certification by applicants, verification by the Approved Vendor, and validation by the Program Administrator. Since residents of Income-Eligible Communities (IECs) are allowed to attest their income eligibility

for Community Solar and Residential Solar (Small) projects, and that method is least invasive to applicants, it will be prioritized for projects within those two sub-programs. For projects across all sub-programs, a prescribed order of verification methods is required to ensure that the least invasive method is used first. The definitions and methods below detail the processes for all sub-programs.

The contract between the Approved Vendor and the property owner is a separate process, and the verification associated with that contract is different from income verification for the Program participants. Property owners are not required to live onsite.

## 6.2 Property Ownership Verification

For projects within the Residential Solar and Non-Profit and Public Facilities sub-programs, property owners contract directly with the Approved Vendor or their agents or subcontractors for the installed solar. The Approved Vendor must verify property ownership by obtaining a copy of either a) the current recorded property deed (e.g., warranty deed, quit-claim deed); or b) the most recent property tax statement and submitting it to the Program Administrator as part of the Part I application. The Program Administrator may accept other documents that verify proof of ownership (as determined by the Program Administrator) if any property owner is unable to provide either of those documents to the Approved Vendor. In the Residential Solar sub-programs, income must be verified for households counting toward eligibility (minimum is 50% for multifamily), whether they are property owners or tenants, unless the project is using Whole Building for Residential Solar (Large) Certification (see Section 6.1.1) to verify eligibility.

## 6.3 Income Verification

For purposes of eligibility validation, income is defined as the total income of all household members over the age of 18 based on the most recent IRS 1040 form. Total income is gross income: earnings before taxes, benefits, and other payroll deductions that are withheld from wages.

For purposes of verification, the income of all members of the household who are over 18 years old and reported earned income will be considered, including:

- **Temporarily absent family members:** The income of temporarily absent family members is included regardless of the amount the absent family member contributes to the household. For example, a construction worker employed at a temporary job in a different part of the state earns \$31,200 annually. She keeps \$10,400 annually for expenses and sends \$20,800 annually to her family. The entire amount (\$31,200 annually) is counted in the family's income.
- **Adult students living away from home:** If the adult student who is not the head of the household is counted as a member of the household in determining the household size (to compare against the income limits), the student's annual income must be counted in the household's income.

**NOTE:** A household consists of all people living in one housing unit, and all income of each adult household member must be documented and counted toward the household income.

The following persons are not included in household income:

- **Minors:** Earned income of minors (age 17 and under).
- **Income of live-in aides:** If a household includes a paid live-in aide (whether paid by the family or social service program), the income of the live-in aide, regardless of the source, is not counted, and that person is not counted toward the total number of household members. A related person cannot be considered a live-in aide without the review and approval of the Program Administrator.

- Permanently absent family members: If a family member is permanently absent from the household (e.g., a spouse who is in a nursing home), the head of household may only count that person and their income as a member of the household if they are included on tax returns or pre-qualifying third-party programs.

### 6.3.1 INCOME TYPES

#### INCOME CONSIDERED IN HOUSEHOLD VERIFICATION

Income reported on the 1040 form includes:

- Gross wages, salaries, commissions, sick pay, and tips
- Taxable interest
- Dividends
- Taxable refunds, credits, or offsets of state and local income taxes
- Social Security (“SSA”) or Disability (“SSDI”)
- Supplemental Security Insurance (“SSI”)
- Veteran Affairs (“VA”) benefits
- Railroad Retirement benefits
- Military Retirement Pay and Severance Pay
- Unemployment benefits (UCB)
- Alimony (or separate payments) received
- Business or self-employment income (or loss)
- Taxable amount of pension, IRA, and annuity payments
- Lottery income
- Rental real estate, royalties, partnerships, and S Corporations or trusts
- Farm income (or loss)

In addition to the income reported on the 1040 form, the following are also considered income for participation in ILSFA:

- Armed Forces allotments and allowances for housing, food, and clothing
- Cash gifts, including “GoFundMe” or other crowdfunding platforms, excluding Every Dollar Counts/Universal Basic Income projects approved by LIHEAP
- Child support
- DHS cash payments from TANF, AABD supplemental payments, Transitional Assistance, and Refugee/Repatriate Assistance (“RRA”)
- Payments for mortgage or sales contracts (i.e., income received for contract-for-deed sales)
- Commission checks (those that cover more than one month should be divided by the appropriate number of months to equal the 30-day income requirement)
- Monthly payments of the Federal Black Lung Benefits Act
- Gambling proceeds and/or annual gross income should not exceed the annual 150% income eligibility
- General assistance
- Regular payments from an Individual Retirement Account
- Online income (income received from online sales websites such as eBay for profit)
- Rental income—counted if the applicant rents property outside their own household or the applicant shares their home (e.g., one household unit with a boarder, lodger, and/or renter who is NOT related)
- Social Security income received for a spouse who resides in a nursing home/assisted living facility that is not paid directly and completely to the facility
- Strike benefits
- Support income received for guardianship and/or adoption of child(ren)

- Worker’s Compensation
- Rideshare, vehicle, and/or transport services for hire (e.g., Uber, Lyft, Relay Rides, Sidecar) —calculate income using customer logs, ledgers, and/or printouts (e.g., from PayPal)
- Legal settlements with regular payments (not lump sum)
- Educational stipends (a periodic payment, especially a scholarship or fellowship allowance granted to a student)

## **ALLOWED DEDUCTIONS**

Net income must be considered for Social Security checks that have a Medicare deduction ONLY for Hospital, Medical, and/or Prescription Drug insurance (Parts A, B, and D). For income documentation (e.g., wages, Unemployment Compensation Benefits, SSA, SSDI) which clearly indicates child support garnishment, the gross minus the garnishment amount should be used as countable income. In addition, households with documented child support payments (e.g., canceled checks, a statement from the recipient, other documentation showing the payments were made) will have these amounts deducted from gross household income. In situations where a fixed income has recoupment for child support, Internal Revenue Service (“IRS”), or other garnishment, net income should be budgeted; use net income except for included taxes (if applicable).

## **INCOME VERIFICATION FOR FIXED INCOME INDIVIDUALS**

Individuals receiving a monthly income with very little to no flexibility in the amounts received are considered fixed income. Fixed income includes SSI, SSA, VA Benefits, DHS Payments (TANF, AABD, RRA), and Pensions. It is preferable to verify fixed income using the award letter if dated within the same calendar year.

Acceptable documentation for fixed income also includes:

- Check(s) or copy of the check(s) for fixed income
- Statement of a person who cashes the checks (i.e., currency exchanges, banks, grocery stores)
- Statement or affidavit from the source of the income, such as employer, Social Security Administration, Department of Human Services (or any State office), Veterans’ Administration, Department of Labor, Township
- For SSA documentation, on the occasion when a benefit award letter and a current bank statement don’t match, the bank statement amount should be used as the countable income

## **NOT CONSIDERED INCOME :**

### **Ancestry-Related:**

- Payments received under the Alaska Native Claims Settlement Act
- Payments to certain United States citizens of Japanese ancestry and resident Japanese aliens and certain eligible Aleuts made under P.L. 100-383
- Payments under P.L. 103-286 to persons due to their status as victims of Nazi persecution

### **Assets:**

- Withdrawals from a bank (or other financial institution), such as individual savings accounts
- One-time withdrawals or the balance of retirement, pension, or annuity where funds cannot be withdrawn without a penalty
- Loans (including student loans)
- Money received from a reverse mortgage (but can be used as proof of “regular monthly support” for Zero Income applicants)
- Sale of house or car

- Sale of household items/assets at yard sales, on eBay, or other online sites is not income when household items are sold occasionally but is proof of how all or part of the household's monthly expenses were paid
- Sale of property
- Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970
- Tax refunds, including Earned Income Tax Credit ("EITC") payments, whether received as an advance payment with wages or as part of an income tax refund

**Benefits:**

- Earned or unearned income of dependent minors (children under 18 years of age)
- Every Dollar Counts, Heartland Alliance, Universal Basic Project with benefits protection letter
- Money received from the Social Security Administration under a Plan to Achieve Self-Support ("PASS")
- National School Lunch Program ("NSLP") free or discounted lunches
- Supplemental Nutrition Assistance Program ("SNAP") benefits (Food Stamps)
- Women, Infants, and Children Supplemental Nutrition Program ("WIC") benefits

**Educational:**

- Federal student aid (grants or loans to undergraduate students made or insured under programs administered by the Department of Education)
- Funds in a qualified tuition program described in section 529 of the Internal Revenue Code
- Funds in a Coverdell education savings account under section 530 of the Internal Revenue Code
- Income from work-study programs
- Scholarships, subsistence amounts (BAS on pay stub; an allowance paid to Veterans while they pursue an educational or training program), GI Bill benefits

**Foster Care (note: do not count foster children as household members):**

- Foster Parent Reimbursement
- Foster Grandparents/Senior Companion Stipend—any payment to volunteers in programs under Title II of the 1973 Domestic Volunteer Services Act; examples of these programs include RSVP and Foster Grandparents

**Indian Tribes:**

- Tribal per-capita payments up to \$2,000 per person per year, including payments made of income from tribal lands, payments made of tribal judgment trust funds, and any other source except gaming revenues
- Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes
- Income received from the disposition of funds to the Grand River Band of Ottawa Indians
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of the Yakima Indian Nation or the Apache Tribe of the Mescalero Reservation
- Payments to the Passamaquoddy Tribe and the Penobscot Nation or any of their members made under the Maine Indian Claims Settlement Act of 1980
- Payments of relocation assistance to members of the Navajo and Hopi Tribes made under P.L. 93-531

**Title I:**

- Earnings, allowances, and payments received under Title I of the National and Community Service Act of 1990 are exempt; the programs in the Act are:
  - Serve America, Higher Education Innovative Projects, American Conservation and Youth Corps Programs, Community Service Programs, and AmeriCorps State/National

- Payments made under Title I of the 1973 Domestic Volunteer Services Act (AmeriCorps VISTA, University Year for Action, and Urban Crime Prevention Program) are exempt if the person was receiving SNAP or cash benefits from TANF, GA, or AABD at the time they joined AmeriCorps VISTA
  - A temporary interruption in SNAP/Food Stamps does not change the status of exempt AmeriCorps VISTA payments
- Income from employment through the Workforce Innovation and Opportunity Act (WIOA), including Job Corps

**Title V:**

- Senior Temporary Training Program; payments received from the Community Service Employment Program funded under Title V of the Older Americans Act (such as the Experience Works Program, formerly called Green Thumb)

**Veterans:**

- Payments made to veterans who receive an annual disability payment or to the survivors of deceased veterans who receive a one-time, lump sum payment from the Agent Orange Settlement Fund or any other fund referring to Agent Orange product liability under P.L. 101-201
- Monetary allowances for certain children of Vietnam War veterans (children born with the congenital defect spina bifida and with certain birth defects)
- Additional payments received by military personnel for serving in a combat zone
- Veteran's Administration Pension Benefits for Aid and Attendance
- Disability compensation
- Disability pension
- Education and training benefits (like the Post-9/11 GI Bill)
- Housing grants (like the Specially Adapted Housing ("SAH") grant)
- Life insurance benefits from specific groups like the Servicemembers' Group Life Insurance Traumatic Injury Protection, Service-Disabled Veterans' Insurance, and Veterans' Mortgage Life Insurance
- The Compensated Work Therapy (CWT) Program
- Additional payments received by military personnel for serving in a combat zone (Active Duty)

**Other:**

- Disaster relief payment made by federal, state, or local government or by a disaster assistance group
- Gifts in the form of non-cash assistance (e.g., food, clothing, rent)
- Life insurance proceeds (whether made in installments or paid upfront)
- Non-cash income
- One-time insurance payments or compensation for injury
- One-time payments, excluding cash gifts (e.g., Death Benefits, Circuit Breaker Benefits, jury duty, retroactive child support, SSI, SSA, UCB)
- Matched funds that are deposited into an Individual Development Account (IDA) from a unit of state or local government or through contributions made by a not-for-profit entity are exempt income
  - Funds deposited into the IDA remain exempt as long as the IDA is maintained
- Payments made to others on the household's behalf provided that such payments were not directed by the household (e.g., bills paid or purchases made by others)
- Payments made through the Victims of Crime Act of 1984
- Payments for Vocational Rehabilitation transportation and maintenance
- Reimbursement for other expenses incurred (e.g., medical expenses, mileage, gas, lodging, meals, Per Diem)

- Utility payments from a Public Housing Authority, whether paid directly to the unit or to the utility company

#### **Trade Readjustment Allowance Department of Labor—Employment and Training Administration**

- Payments made under the YouthBuild Program (P.A. 102-550)
- Reimbursement for other expenses incurred (e.g., medical expenses)
- Utility payments from a Public Housing Authority, whether paid directly to the unit or to the utility company

### **6.3.2. INCOME VERIFICATION METHODS**

To reduce the burden on Program participants and the Program Administrator and to mitigate the risk of storing sensitive personal information, ILSFA will implement a tiered approach for applicant income verification for Residential Solar (Small) and Community Solar projects.<sup>59</sup> The tiered approach ensures that the least invasive methods are tried first, moving progressively through alternate methods until income eligibility is determined.

There are four methods of income verification allowed for Residential Solar and Community Solar projects that differ depending on the sub-program. It is the responsibility of Approved Vendors to certify participant eligibility. While the Program Administrator acts as the central source for income verification, and potential subscribers to Residential Solar (Small) and Community Solar projects may request to have their income verified by the Program Administrator directly, Approved Vendors have the primary responsibility of verifying the eligibility of individual applicants.

The Approved Vendor will follow the tiered methods of income verification appropriate for each sub-program. The Approved Vendor will provide the verification documentation required for each applicant or qualified building according to the methods prescribed below. Regardless of the verification method or sub-program, the applicant will first certify eligibility by completing and signing the Certification and Consent Form. By signing this form, the applicant is confirming their “household makes no more than 80% of area median income or less based on my County of residence and household size.” This form is available in the Approved Vendor Portal.

Once the participant has certified to the Approved Vendor that they meet the income requirements, the Approved Vendor will collect the prescribed documentation to verify the eligibility of the applicant using one of the methods described below. Finally, the Program Administrator will then validate the findings by reviewing the Certification and Consent Form and the supporting documentation to ensure all information is complete and meets the eligibility requirements. Income verification that meets the eligibility requirement is good for 18 months from the date of validation. Approved Vendors must submit Part I within 18 months of validation.<sup>60</sup>

The documentation collected for income verification may contain sensitive information, also known as personally identifiable information (“PII”). To protect participant information, Approved Vendors will need to redact PII on all documents before submitting them to the Program Administrator in the Approved Vendor Portal. More instructions for redacting PII are included in Sections 6.1 and 6.3 below.

#### **METHOD A: THIRD-PARTY QUALIFYING PROGRAM VERIFICATION**

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<sup>59</sup> The Non-Profit and Public Facilities sub-program does not qualify applicants based on income and requires a different approach to eligibility verification, detailed below in Section 6.2.

<sup>60</sup> Updated from 12 months in the 2026 Long-Term Plan. See Section 8.10.3.2 of the 2026 Long-Term Plan.

There are a number of existing programs, including housing and energy assistance programs, in which income eligibility is equivalent to, or stricter than, that of ILSFA such as the Low-Income Home Energy Assistance Program (LIHEAP), the Illinois Housing Weatherization Assistance Program (“IHWAP”), the U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers, Project-Based Rental Assistance (for multifamily), income-eligible multifamily energy efficiency, or tax-subsidized multifamily programs. Households that participate in these programs automatically qualify for ILSFA upon validation by the Program Administrator. The following lists show the currently qualifying third-party programs. A separate document shows the required documentation that the Approved Vendor will collect for verification. The documentation is divided for homeowners and renters, or for multifamily buildings, and includes PII redaction examples. The Illinois Low-Income Discount Rate – Tiers 1, 2, 3, and 4 is a newly accepted third-party qualifying program, and the acceptable documentation will be included in the supplemental document as these rates are implemented.

**Homeowners and Renters:**

- Supplemental Nutrition Assistance Program (SNAP)
- Low Income Home Energy Assistance Program (LIHEAP)
- Illinois Low-income Discount Rate – Tiers 1, 2, 3, and 4
- Illinois Housing Weatherization Assistance Program (IHWAP)
- Medicaid
- Aid to the Aged, Blind, and Disabled (“AABD”)
- Temporary Assistance for Needy Families (“TANF”)
- U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers
- U.S. Department of Housing and Urban Development (HUD) Project-Based Rental Assistance
- Illinois Affordable Housing Act

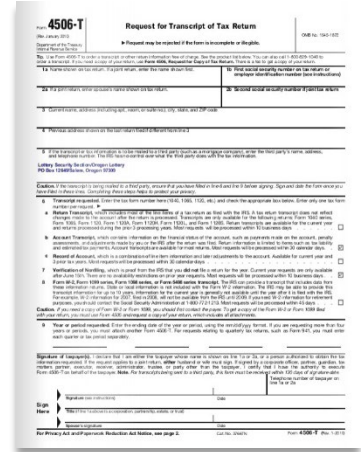
**Multifamily Buildings:**

- Income-Eligible Multifamily Energy Efficiency Programs
- Tax Subsidized Multifamily Programs

The income scales used to determine eligibility vary between programs. Customers qualifying through third-party program participation that utilize income scales other than area median income may require additional verification to ensure a household meets ILSFA’s 80% AMI threshold if the qualifying program’s income threshold exceeds 80% AMI. Due to the fact that the 60% state median income guidelines of LIHEAP, and 200% federal poverty level income guidelines for IHWAP and Tier 4 of the Low-Income Discount Rates, and other third-party qualify programs may sometimes fall above the 80% AMI used by ILSFA, some households that are of a certain size and in particular counties may need additional follow-up to ensure that they are income-eligible. The Program Administrator will still accept proof of LIHEAP or IHWAP approval as documentation of income eligibility, but with additional verification to confirm household income eligibility to reduce inconvenience to the participant or the Approved Vendor. For households with four or more members, counties not noted as "HUD Metro FMR" on the Maximum Income table might require additional review.

**METHOD B: TAX TRANSCRIPT VERIFICATION**

A third-party tax transcript vendor has been selected to provide independent income verification of households. This method requires Approved Vendors first to have occupants certify that they are below the required income threshold per the defined percentages of AMI established for each Illinois county and for that household size. [Download a list displaying qualified incomes by Illinois county and household size](#) in the Approved Vendor Portal. Once the applicant has certified eligibility, the Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-C) for all household members aged 18 and over and send or upload the form to the third-party tax transcript vendor using secure fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable). Upon receipt, the household's previous year's income is provided to the Program Administrator. The Approved Vendor must destroy hard copies of completed 4506-C forms within one week of the determination of applicant eligibility. Approved Vendor employees must be trained on the proper handling and protection of these documents to maintain their confidentiality; only trained employees may handle the documents.



### METHOD C: TAX RETURNS, PAY STUBS, BENEFITS AWARD LETTERS

Electronic copies (which may include scans and/or photographs) of each household member's prior year's income tax forms or pay stubs from the previous 30 days must be submitted to the Approved Vendor for verification. Pay stubs must indicate the payee, source, time period, date issued, and amount. Benefit award letters, such as Social Security (SSA), Supplemental Security Income (SSI), Veteran Affairs (VA), and Social Security Disability Insurance (SSDI), must show the current monthly benefit amounts and be dated within the current calendar year. Approved Vendor employees must be trained on the proper handling and protection of these documents to maintain their confidentiality; only trained employees may handle the documents. The Approved Vendor will submit electronic copies to the Program Administrator for validation. The Program Administrator will retain electronic copies of documents. Hard copies and electronic documents will be destroyed within one week of the determination of eligibility, where a participant's verification method includes the use of pay stubs or tax returns. Additional documentation may be accepted on a case-by-case basis. These documents should be treated as sensitive information by the Approved Vendor and destroyed within one week of the determination of eligibility by the Program Administrator. Due to the added burden required to obtain household member documentation, the Program Administrator suggests that pay stubs only be used as verification of income eligibility when necessary.

### METHOD D: SELF-ATTESTATION IN INCOME-ELIGIBLE COMMUNITIES

The Community Solar and Residential Solar (Small) sub-programs allow for an additional household eligibility verification method when the participant resides in an IEC. The Approved Vendor should use the [IEC Map](#) provided by the Program Administrator to identify if a prospective participant resides in a community where income verification can be completed through self-attestation. Approved Vendors must also complete the Certification and Consent form with the participant, in which the customer self-attests that their income does not exceed 80% AMI. Once the vendor has gathered this information, they can enter the data into the portal for that household.

It's important to note that households still must be income-eligible if they live in IECs in order to participate in ILSFA. Self-attestation is only a simplification of the income documentation requirements, not of the income eligibility requirements.

### VERIFICATION FOR ZERO INCOME OR NO INCOME DOCUMENTATION

Any and every adult claiming zero income or having no documentation of cash income must submit an Income Affidavit capturing income (or zero income) for the last 30 days.

## INCOME VERIFICATION FOR MULTIPLE ADULT HOUSEHOLDS

There are various methods to verify the income of a household with multiple adults. Households that qualify at the household or property level do not need to verify individual adult household members' income (e.g., households residing in IECs who verify their income through self-attestation, LIHEAP or IHWAP, HUD Project-Based Vouchers or Rental Assistance Vouchers, or Tax-Subsidized Multi-Family Programs). Where verification of individual adult household members' income is required, each individual must submit income documentation as outlined in Sections 6.4 and 6.3 below.

### 6.4. Income Verification by Sub-Program

The process listed below is for Residential Solar (Small) projects. See Section 6.4.2 below for the Whole Building for Residential Solar (Large) Certification process for projects on properties with five or more units.

#### 6.4.1 RESIDENTIAL SOLAR (SMALL) HOUSEHOLD VERIFICATION

The Approved Vendor will collect a completed Certification and Consent Form, which can be found on the ILSFA website, for all residential units in the building counting toward eligibility (minimum is 50%) and send/upload the forms to the Program Administrator unless the project is on a building with five or more units that are demonstrating income-eligibility through Whole Building for Residential Solar (Large) Certification (see Section 6.1.1). The Certification and Consent Form will capture key contact and demographic information, including the legal name of the homeowner, complete address, number of people living in the household, household income range, and third-party qualifying program (if applicable). This completed and signed form, along with the verification documentation prescribed (including verification of building ownership), will be sent electronically to the Program Administrator via the Approved Vendor Portal. Additionally, the owner of a multifamily building or a non-owner-occupied single-family home must sign an agreement that commits to maintaining affordability for the next 10 years.

##### METHOD A

##### THIRD-PARTY QUALIFYING PROGRAM VERIFICATION

**Step A1:** The applicant will certify that they are currently eligible based on annual household income requirements of 80% or less of AMI using either the current [income-eligibility chart](#) or the online ILSFA [Area Median Income verification tool](#) and complete the Certification and Consent Form.

**Step A2:** The Approved Vendor will determine if the applicant's household or property is currently enrolled in any qualified program and has been qualified within the previous 12 months.

**Step A3:** If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and send/upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Tax Transcript Verification.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting them to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator, and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver’s license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income numbers, taxpayer identification numbers, and patient identification numbers
- Date of birth (note that the Certification and Consent Form requests date of birth—please use the MM/YYYY format, which is sufficient for verification purposes)
- Financial account numbers, such as bank accounts

The following information is necessary for income verification and should NOT be redacted:

- Participant’s full name
- Participant’s full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

**Step A4:** If the applicant provides Third-Party Qualifying Program documentation, the Approved Vendor will obtain a photocopy or scanned image and submit it to the Program Administrator electronically. The Program Administrator will review the documentation, and an answer of accepted or not accepted will be returned to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will have the opportunity to submit updated or additional documentation or go to Method B: Tax Transcript Verification.

**METHOD B****TAX TRANSCRIPT VERIFICATION**

**Step B1:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-C) for all household members aged 18 and over and send/upload it to the third-party vendor using fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable).

To protect participant information, the Approved Vendor shall not submit copies of the IRS form 4506-C or the tax transcript through the Vendor Portal. After the Approved Vendor submits the IRS form 4506-C through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B2:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B3:** The Program Administrator will compare income level to the 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted or if the third-party tax transcript vendor cannot provide the information, the Approved Vendor will move to Method C.

**METHOD C****TAX RETURN, PAY STUB, OR BENEFITS AWARD LETTER VERIFICATION**

**Step C1:** The Approved Vendor will collect the most recent income tax returns or most recent pay stubs capturing the previous 30 day earnings for all household members aged 18 and over. When using pay stubs, these must include documentation for each household member claimed on the Certification and Consent Form.

**Step C2:** The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting them to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator, and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income numbers, taxpayer identification numbers, and patient identification numbers
- Full date of birth (note that the Certification and Consent Form requests date of birth—please use the MM/YYYY format, which is sufficient for verification purposes)
- Financial account numbers, such as bank accounts

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or pay stub was issued

**Step C3:** The Program Administrator will compare income level to the 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from notification to resubmit any errant documentation in the Approved Vendor Portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. The Approved Vendor may formally appeal any rejection of income verification to the IPA.

The Approved Vendor, on behalf of the applicant, will have two weeks to appeal the rejection in writing on company letterhead, conveyed by email or postal mail. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal.

## METHOD D

## SELF-ATTESTATION IN INCOME-ELIGIBLE COMMUNITIES

**Step D1:** The Approved Vendor will use the IEC ap provided by the Program Administrator to look up the prospective participant's address. If the address is located in an Income-Eligible Community, the Approved Vendor can move on to Step D2. If not, the Approved Vendor should use a different verification method.

**Step D2:** Once the Approved Vendor has verified the participant lives in an Income-Eligible Community, the customer should complete and sign the Certification and Consent form attesting that the household's income does not exceed the 80% AMI.

**Step C3:** The Program Administrator will verify the household is located in an IEC and that the income level is within the 80% AMI threshold to return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor should use a different method, or if they have exhausted all methods, should refer the household to Illinois Shines.

## 6.4.2. WHOLE BUILDING FOR RESIDENTIAL SOLAR (LARGE) CERTIFICATION

Whole Building for Residential Solar (Large) Certification is the process of determining the eligibility of a building with five or more residential units. Eligibility can be met by one of the following methods:

- Submitting rent rolls showing that at least 50% of the units pay rent at or below the HUD Fair Market Rent Prices for the county in which the property is located
- Showing the property meets the definition of Affordable Housing under the Illinois Affordable Housing Act
- Providing documentation to confirm the property qualifies for one of the following:
  - U.S. Department of Housing and Urban Development (HUD) Project-Based Vouchers
  - Project-Based Rental Assistance
  - Income-Eligible Multi-Family Energy Efficiency
- Letter confirming that the building is operated by an Illinois public housing authority/agency

The owner/representative of the property must complete the “Income-Eligible Certification and Consent (“Certification and Consent”) for Whole Building for Residential Solar (Large) Certification” Form. This form captures the number of units and key contact information, including the legal name of the property owner/representative, complete address, and verification method. This completed form, along with the list of current residents (if required) and verification documentation prescribed (including verification of building ownership, if applicable), will be sent electronically to the Program Administrator via the Approved Vendor Portal.

## 6.5. Non-Profit and Public Facilities

**Step 1:** The Approved Vendor will collect a completed Non-Profit and Public Facilities Certification and Consent Form and send/upload it to the Program Administrator electronically. The Non-Profit and Public Facilities Certification and Consent Form will capture key organizational and contact information, including organization name, complete address, primary contact information, certification of services, and whether the organization is a non-profit or public facility. Additionally, if the non-profit organization is not the owner of the property, contact information for the owner must be provided.

### 6.5.1 LOCATION VERIFICATION

**Step 2:** The Non-Profit and Public Facilities sub-program eligibility criteria provide three paths to qualify the property by location. The property must be in either a qualifying ILSFA EJC, IEC, or community adjacent to EJCs or IECs.

**Step 2A Environmental Justice Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Environmental Justice Community Mapping Tool](#).

If the response is qualified (this would include locations that have been approved via the Environmental Justice Community Self-Designation pathway), and the location verification has been completed, then the Approved Vendor will move to step 3: Organizational Eligibility.

If the response is not qualified, the Approved Vendor will move to location verification as outlined in Step 2B.

**Step 2B Income-Eligible Community Verification:** The Approved Vendor will enter the property address into the ILSFA [Income-Eligible Census Tract Mapping Tool](#).

If the response is qualified, the location verification has been completed, and the Approved Vendor will move to step 3: Organizational Eligibility.

If the response is not qualified, the Approved Vendor will move to location verification as outlined in Step 2C.

**Step 2C Adjacent Census Block Verification:** The Approved Vendor will enter the property address into the ILSFA EJC and IEC Maps. The Agency will publish map layers within the EJC and IEC Maps to highlight the eligible adjacent communities for the 2026-2027 Program Year.

If the address is qualified, the location verification has been completed, and the Approved Vendor will move to Step 3: Organizational Eligibility.

If the address is not qualified, the entity does not qualify for ILSFA.

## 6.5.2 ORGANIZATIONAL ELIGIBILITY

**Step 3:** To qualify for the Non-Profit and Public Facilities sub-program, projects must meet organizational eligibility criteria, including 1) satisfying the definition of Critical Service Provider (CSP); and 2) demonstrating the required level of community engagement. For more information, see Section 4.2 and 4.4.

**Step 3A:** Verification as a CSP category includes certification of critical services, certification of communities served, and the submission of 1) an IRS determination letter for 501(c)(3) tax status for non-profits; or 2) government agency statistical classification for public agencies.

The Approved Vendor will electronically submit the completed form to the Program Administrator. The Program Administrator will review the submission and return a response stating whether it is accepted or not. If the applicant institution is not a designated critical service provider, the Approved Vendor must request consideration as a CSP. For more information, see Section 4.4.

**Step 3B:** The Approved Vendor will ensure the Non-Profit and Public Facilities Certification and Consent Form is complete. Documentation of community engagement is required, demonstrating the applicant institution's engagement with the IEC or EJC being served. Documentation must include both:

- A narrative summary by the proposed entity that demonstrates that the Non-Profit or Public Facility actively engages with and impactfully serves the local Income-Eligible Community or Environmental Justice Community; and
- A list of community-based organizations the applicant has partnered with (including letters from those organizations to verify the partnerships) in support of their work in the local Income-Eligible Community or Environmental Justice Community .

Additionally, for a non-profit organization or public entity that does not own its building, the building owner must complete the ILSFA [Qualified Tenant Agreement](#). This document confirms that the building owner has granted permission to the Approved Vendor to apply for ILSFA and that the owner will continue to lease the building to the current tenant or a qualifying non-profit or public entity tenant for a total of five years.

For a public facility, the building must host a department/agency that is a Critical Service Provider, as defined in Section 4.2 of this Manual.

The Approved Vendor will submit the completed form and supporting documentation to the Program Administrator via email, fax, or document upload. The Program Administrator will review the submission and provide either a request for more information or issue a determination.

If the response is accepted, verification has been confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from notification to resubmit any errant documentation in the Approved Vendor Portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. The Approved Vendor may formally appeal any rejection of an application to the IPA at [IPA.ILSFA@Illinois.gov](mailto:IPA.ILSFA@Illinois.gov) with the subject line: CSP Appeal.

The Approved Vendor, on behalf of the applicant, will have two weeks to appeal the rejection in writing following the process in Section 1.4. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal.

## 6.6. Community Solar

### 6.6.1 PROJECT ELIGIBILITY

As discussed in Section 4.3 above, Community Solar projects must provide evidence of community partnerships at the time of Part I project application. Where required, a document upload option will be provided for this element (i.e., documentation of 100% income-eligible subscriber ownership, as well as a letter of intent from the intended anchor tenant).

### 6.6.2 SUBSCRIBER ELIGIBILITY

Separate from the issue of a proposed Community Solar project's eligibility for this sub-program, individual income-eligible households wishing to participate as subscribers to an approved Community Solar project must satisfy several eligibility criteria discussed in Section 4.3 above. The procedures for establishing a subscriber's eligibility are as follows

**Step 1:** The Approved Vendor will collect a completed Household Certification and Consent Form from each household, counting toward eligibility (minimum is 50%) unless the project is on a building with five or more units that demonstrate income eligibility through Whole Building for Residential Solar (Large) Certification (see Section 6.1.1) and send/upload it to the Program Administrator. This form will include an applicant's certification that they currently qualify based on the income eligibility requirements of 80% or less AMI for the household.

**SELF-ATTESTATION METHOD**

**INCOME-ELIGIBLE COMMUNITY**

**Step 1:** The Approved Vendor will enter the applicant's household address into the ILSFA Income-Eligible Community Mapping Tool. This map shows census tracts where 50% of households earn no more than 80% of the

area median income. Note that in previous Program Years, the HUD Qualified Census Tracts, in which at least 50% of residents earn less than 60% of AMI, were used.<sup>61</sup>

**Step 2:** Once the vendor has verified the participant lives in an Income-Eligible Community, the customer should complete and sign the Certification and Consent form to attest that the household's income does not exceed the 80% AMI.

**Subscriber Address Method Step 3:** The Program Administrator will verify the household is located in an IEC and that the income level is located within the 80% AMI threshold to return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will move to Method A.

#### **METHOD A**

#### **THIRD-PARTY QUALIFYING PROGRAM VERIFICATION**

**Step A1:** The Approved Vendor will determine if the applicant's household or property is enrolled in any of the qualified programs and has been qualified within the previous 12 months.

**Step A2:** If yes, the Approved Vendor will collect the required documentation corresponding to the Third-Party Qualifying Program and send/upload the form to the Program Administrator. If the applicant is not enrolled in a Third-Party Qualifying Program or does not have Third-Party Qualifying Program documentation, the Approved Vendor will go to Method B: Tax Transcript Verification.

**Step A3:** If Third-Party Qualifying Program documentation is presented, the Approved Vendor will obtain a copy and submit it to the Program Administrator electronically. The Program Administrator will review the documentation, and an answer of accepted or not accepted will be returned to the Approved Vendor within one week.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendor will redact PII on all documents before submitting them to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator, and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income numbers, taxpayer identification numbers, and patient identification numbers
- Full date of birth (note that the Certification and Consent Form requests date of birth—please use the MM/YYYY format, which is sufficient for verification purposes)

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<sup>61</sup> Section 8.10.3.2 of the 2022 Long-Term Plan (footnote 544) states that in its Final Order, the Commission required that the Agency immediately expand the acceptance of signed affidavits for Community Solar participants to applicants living in census tracts where 50% of residents make no more than 80% of the area median income. See Docket No. 22-0231, Final Order dated July 14, 2022, at 122.

- Financial account numbers, such as bank accounts

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Third-Party Qualifying Program name
- Date program documentation was issued

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted, the Approved Vendor will go to Method B: Tax Transcript Verification.

Participants referred to ILSFA through the designated referral process from LIHEAP agencies, for Community Solar, will not be completing steps A1-A3 but rather will complete third-party income verification with the LIHEAP Agency serving them. Participants will complete the LIHEAP Consent and Income Verification Form, which collects information on the household size, demographics, and income level. This will include a confirmation by the LIHEAP representative that LIHEAP has approved the household.

**METHOD B****TAX TRANSCRIPT VERIFICATION**

**Step B1:** The applicant will certify that they qualify based on AMI using the current [ILSFA Area Median Income worksheet](#) and complete the Household Certification and Consent Form.

If the applicant's household does meet income eligibility, proceed to Step B2.

If the applicant's household does not satisfy income eligibility, they cannot participate in the Program.

**Step B2:** The Approved Vendor will collect a Request for Transcript of Tax Return Form (IRS Form 4506-C) for all household members aged 18 and over and send/upload it to the third-party tax transcript vendor using fax, email, or custom interface (note: wet or e-signatures via secure email link are acceptable).

The Approved Vendor shall not submit copies of the IRS Form 4506-C or the tax transcript through the Vendor Portal to protect participant information. After the Approved Vendor submits the IRS Form 4506-C through the third-party credit agency portal, the Program Administrator can view the information in the third-party credit agency portal to verify eligibility.

**Step B3:** The third-party tax transcript vendor will provide verification data to the Program Administrator.

**Step B4:** The Program Administrator will compare the income level to the 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted or if the information cannot be provided by Experian, the Approved Vendor will move to Method C.

**METHOD C****TAX RETURN, PAY STUB, OR BENEFITS AWARD LETTER VERIFICATION**

**Step C1:** The Approved Vendor will collect the most recent income tax return or most recent pay stubs, capturing

the previous 30-day earnings for all household members aged 18 and over. When using pay stubs, documentation for the presence of each household member claimed on the Certification and Consent Form must be included.

**Step C2:** The Approved Vendor will review income to determine eligibility and provide electronic documentation to the Program Administrator for validation.

Supporting documentation collected for income verification may contain sensitive information, also known as personally identifiable information (PII). To protect participant information, the Approved Vendors will redact PII on all documents before submitting them to the Program Administrator in the Vendor Portal.

Submitted documents that contain PII will be removed by the Program Administrator, and the Approved Vendor will be notified and required to resubmit.

PII may include the following:

- ID numbers, including driver's license numbers, state ID numbers, passport numbers, social security numbers, supplemental security income numbers, taxpayer identification numbers, and patient identification numbers
- Full date of birth (note that the Certification and Consent Form requests date of birth—please use the MM/YYYY format, which is sufficient for verification purposes)
- Financial account numbers, such as bank accounts

The following information is necessary for income verification and should NOT be redacted:

- Participant's full name
- Participant's full mailing address
- Date tax return or pay stub was issued

**Step C3:** The Program Administrator will compare the total household income level to the 80% AMI threshold and return an accepted or not accepted response to the Approved Vendor.

If the response is accepted, the income verification process is confirmed and completed.

If the response is not accepted due to missing or incorrect documentation, the Program Administrator may request additional information via email. The Approved Vendor will have two weeks from notification to resubmit any errant documentation in the Approved Vendor Portal and then notify the Program Administrator. The Program Administrator will then inform the Approved Vendor as to whether the documentation has been accepted within one week of resubmission. In the case that it is deemed that the applicant organization does not qualify for ILSFA, the Approved Vendor may formally appeal to the IPA.

The Approved Vendor, on behalf of the applicant, will have two weeks to appeal the rejection in writing following the process in Section 1.4. The IPA will review all appeals and will be the final authority for granting or rejecting an appeal.

All tax or pay documentation in possession of the Approved Vendor will be destroyed after eligibility is determined.

## **6.6.4 COMMUNITY SOLAR SUBSCRIBERS, SHARES, AND ANNUAL SUBSCRIBER VERIFICATION**

Community Solar projects require that a minimum of 50% of the total system size (excluding any share subscribed to by an anchor tenant) be allocated to qualified households by one year after Energization. The share of

Community Solar RECs paid for at the ILSFA Community Solar REC price upon Energization is determined by the total system share to which qualified income-eligible households subscribe. An anchor tenant that is a non-income-eligible residential household, non-profit or public facility, or a business would receive payment for RECs at the Illinois Shines program Community-Driven Community Solar REC price for its subscription share.<sup>62</sup> A one-time payment for the full contract value, determined on this basis, will be made shortly after Energization.

One year after Energization, Approved Vendors will submit annual reports for each Community Solar project (as detailed in Section 11, the Renewable Energy Credit Management section of this Manual). These reports require data reporting for all participants, including changes in share for existing subscribers and new subscribers relative to when the prior contractual payment will be made.

The Program Administrator will validate each new participant's eligibility during annual reporting in the same way as during Part II project review. The requirements that a minimum 50% system share (after excluding the anchor tenant's share, if any) be allocated to income-eligible households must be met at this time. If the project fails to reach the 50% threshold for a delivery year, collateral will be drawn upon to claw back 100% of the allocated payment for that delivery year (i.e., roughly 1/15 of the total contract price).

## 6.4. Data Management and Validation

Household and Non-Profit and Public Facilities Certification and Consent Forms contain applicants' certification of eligibility for their respective sub-program. The Approved Vendor uses these forms as documentation that verifies eligibility and shares them with the Program Administrator for validation. The Approved Vendor submits the form to the Program Administrator via the Approved Vendor Portal during data entry for the Part I project application, except in the case of the Community Solar sub-program, where the form is submitted as a part of the Part II application. Data is collected and transferred for each Program applicant.

Data is validated per the processes indicated above with individual application validation(s) of eligibility required to complete Part I project approval. For Residential Solar projects where multiple adult members of the same household must meet eligibility requirements, all applicants must be validated before Part I project approval can be completed. Once eligibility is determined for any applicant, the electronic and hard copy documentation must be destroyed by the Approved Vendor within one week of eligibility being determined. The Program Administrator will retain required information digitally in compliance with state document retention requirements.

# 7. Marketing and Consumer Protection Requirements

## 7.1. Consumer Protection

In addition to technical system requirements, Approved Vendors in ILSFA must work within prescribed guidelines that govern their interaction with the marketplace, Grassroots Educators, and potential and actual Program participants. Communities with higher concentrations of lower incomes have historically been underserved by programs that offer resources and incentives for energy, housing, and access to capital. These communities have generally had very low participation in the renewable energy economy. This has created an information gap and a

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<sup>62</sup> Note, this represents a change from the first two Program Years, when non-profit or public facility anchor tenants could receive REC payments at the ILSFA Community Solar price.

high level of distrust of the institutions and programs designed to help them. These communities have often been targeted with false or deceptive marketing practices, predatory sales, unfair contracts, and poor-quality workmanship.

ILSFA consumer protection requirements are provided in detail in the [Consumer Protection Handbook](#). Consumer protections include requirements that the information shared with participants is clear and accurate to ensure a transparent and positive experience for participants. Approved Vendors are required to indicate their adherence to the Consumer Protection Handbook during registration. All aspects of consumer protection will be monitored by the Program Administrator during project and contract approval and are embedded into project approval processes.

ILSFA also developed an [Energy Resources Guide](#), a catalog of several federal, state, local, and utility-sponsored sources of assistance for energy efficiency, energy bill payment, and home maintenance. This guide is updated once a year. It is shared with participants of the Home Repairs and Upgrades Pilot as an additional resource for their needs.

### 7.1.1 CONTRACT REQUIREMENTS

Approved Vendors and their agents (including installers and marketers) must meet a specified set of contract requirements in their installation contracts (Residential Solar or Non-Profit and Public Facilities projects) or subscription contracts (Community Solar projects). Approved Vendors are required to submit a completed Contract Review Checklist prior to submitting either a Part I application (for Residential Solar or Non-Profit and Public Facilities projects) or a Part II application (for Community Solar projects). The IPA and Program Administrator reserve the right to request copies of these contracts. Prior to contracting with customers, Approved Vendors will be required to have Program approval of all their customer contract templates. Each version of the template must be approved by the Program team.

- [Residential Solar and Non-Profit and Public Facilities Contract Requirements](#)
- [Community Solar Contract Requirements](#)
- Contract Review Checklist

## 7.2. Program Informational Brochures

The Program Administrator has developed three standard informational brochures for ILSFA—one for Residential Solar (Small and Large), one for Community Solar, and one for Non-Profit and Public Facilities. The brochure has been added to the beginning of the Disclosure Form to simplify and ensure compliance with this requirement. Each informational brochure is available in English and Spanish. Approved Vendors may access and download these standard brochures at the following links:

- [Residential Solar \(Small and Large\)- English](#)
- [Residential Solar \(Small and Large\) - Spanish](#)
- [Community Solar - English](#)
- [Community Solar - Spanish](#)
- [Non-Profit and Public Facilities- English](#)
- [Non-Profit and Public Facilities- Spanish](#)

The standard brochures are presented in a frequently asked questions format to help answer anticipated questions from participants and prospective participants. The brochures present information on the following topics:

- What is Illinois Solar for All?
- Who can participate?
- How much can I save with ILSFA?

- What are the financing and ownership (or participation) options?
- How does ILSFA ensure safe and fair business practices?

The Program Administrator developed these standard informational brochures with the IPA, and they cannot be adapted in any way. All participating Approved Vendors must sign a form acknowledging that they have received these standard brochures and understand that they cannot be changed in any way.

Approved Vendors can also create their own ILSFA marketing materials that are targeted to their audience, program, offers, and location. All Approved Vendor marketing materials must adhere to ILSFA content and branding criteria outlined in Sections 7.3 and 7.4.

**NOTE:** Approved Vendor marketing materials must also be submitted to and approved by the Program Administrator. See Section 7.6 of the Manual about the Program Administrator Review Process for more information.

However, the ILSFA standard brochures must always be presented to participants, regardless of other marketing materials used.

**Prior to the execution of the contract,** the Approved Vendor or Designee must provide a copy of the applicable standard Disclosure Form, with all relevant fields completed, to the participant, including the relevant standard informational brochure attached as the first two pages. The informational brochure and Disclosure Form must be provided in their entirety and not be edited or modified. For in-person contract execution, the agent must review the Disclosure Form with the participant and provide the opportunity to ask questions. For online contract execution, the platform must provide a phone number or online chat function for participant questions. The Approved Vendor or Designee must provide the completed standard Disclosure Form, and the customer must sign that Disclosure Form before the participant signs a contract.

**Delivery:** The standard informational brochure may be delivered to the participant in person or electronically, but it must be shared as a downloaded file (attachment), not merely hyperlinked in an email or other digital communication. Alternatively, an informational brochure may be included as the first two pages of a Disclosure Form packet being sent to the customer for signature from the portal.

## 7.3. Program Branding

The Illinois Solar for All Program updated its brand guidelines in 2025 to reflect best practices in design, ADA compliance, and consistency. Approved Vendors are required to utilize the new brand guidelines to market the Program to participants. Correct and consistent usage of all brand elements, including the logo, colors, and messages, is vital to the quality and integrity of the ILSFA brand. Approved Vendors are required to provide draft marketing materials pertaining to ILSFA to the ILSFA program team. The ILSFA program team reviews to ensure branding standards are met and grants approval to the Approved Vendor to use the materials. Failure to provide draft materials to the ILSFA program team for review may result in disciplinary action.

### 7.3.1 ILSFA LOGO

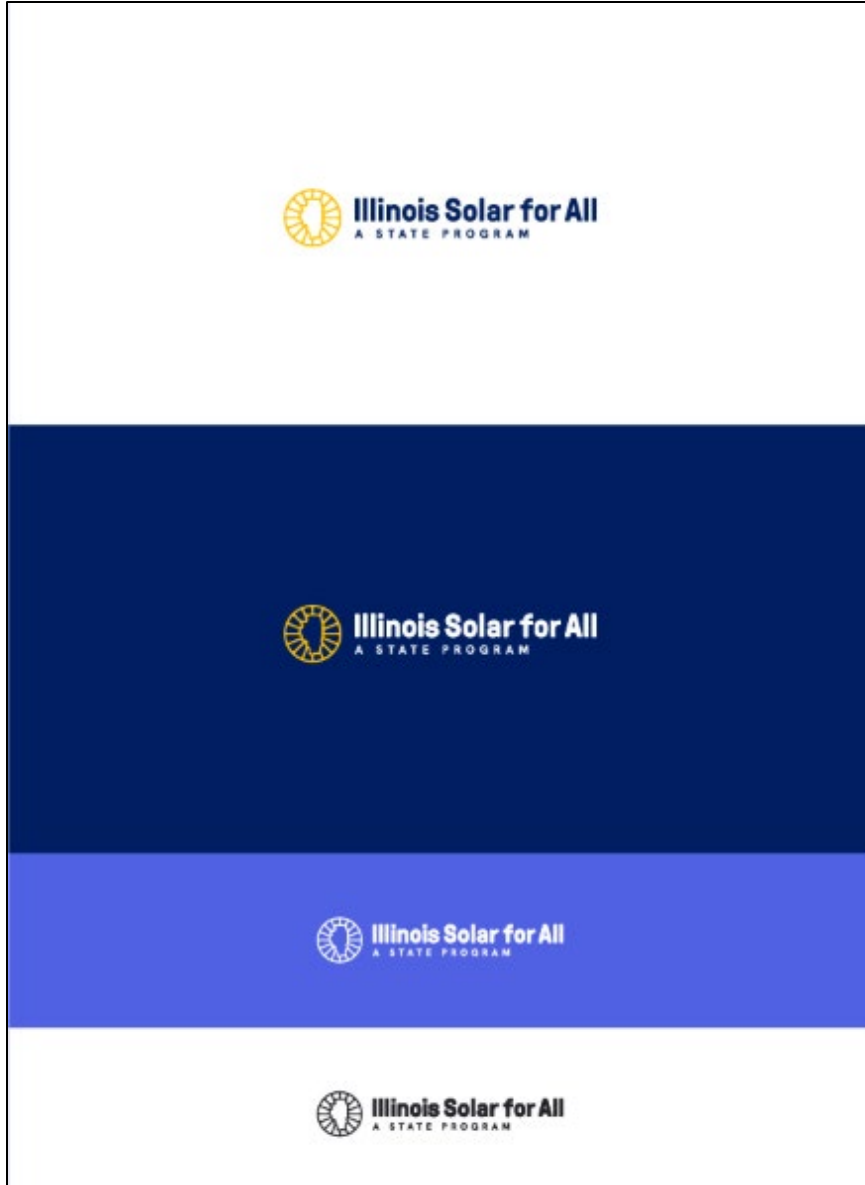
Approved Vendors must use the ILSFA logo on marketing materials, both print and digital, that they create to market the Program. The ILSFA logo may be used only in materials that include information about the Program. The Program Administrator must approve all uses of the ILSFA logo in Approved Vendor marketing materials. See Section 7.6 of the Manual about the Program Administrator Review Process for more information. To receive a copy of the logo and brand guidelines, please contact [marketing@illinoisSFA.com](mailto:marketing@illinoisSFA.com).

The use of the ILSFA logo must adhere to the specifications listed below to maintain a consistent brand presence.

**PRIMARY LOGO**



The full-color Illinois Solar for All logo (with descriptor) is the primary version for the brand and should be the first choice for all placements. The full-color logo should be placed on a white or light-color background for the most impact. The reverse colors or black and white logo should only be used when there is not enough contrast to use the full-color logo option. No other color combinations of the logo are permitted.



**PRIMARY LOGO - NON-DESCRIPTOR**

The logo version without the “A State Program” descriptor should be used where the logo needs to appear at a small size, and the descriptor is not legible or visible enough.



## LOGO SIZE AND POSITION

The logo should never be smaller than the minimum sizes listed here to guarantee legibility across all media. Maintain a distance equal to the letter S from 'Solar' in every corner when using the ILSFA logo to prevent interference with other images, text, or logos.



## 7.3.2 COLOR PALETTE

### MAIN COLORS

The core palette of dark blue, blue, light blue, and bright yellow should be the dominant colors for all ILSFA materials. Their consistent use will ensure cohesion and connectedness across all brand touch points.

### GRADIENT

The solar blue gradient (see example below) is only used to fill backgrounds. Always use the direction and location to maintain consistency across the brand components.

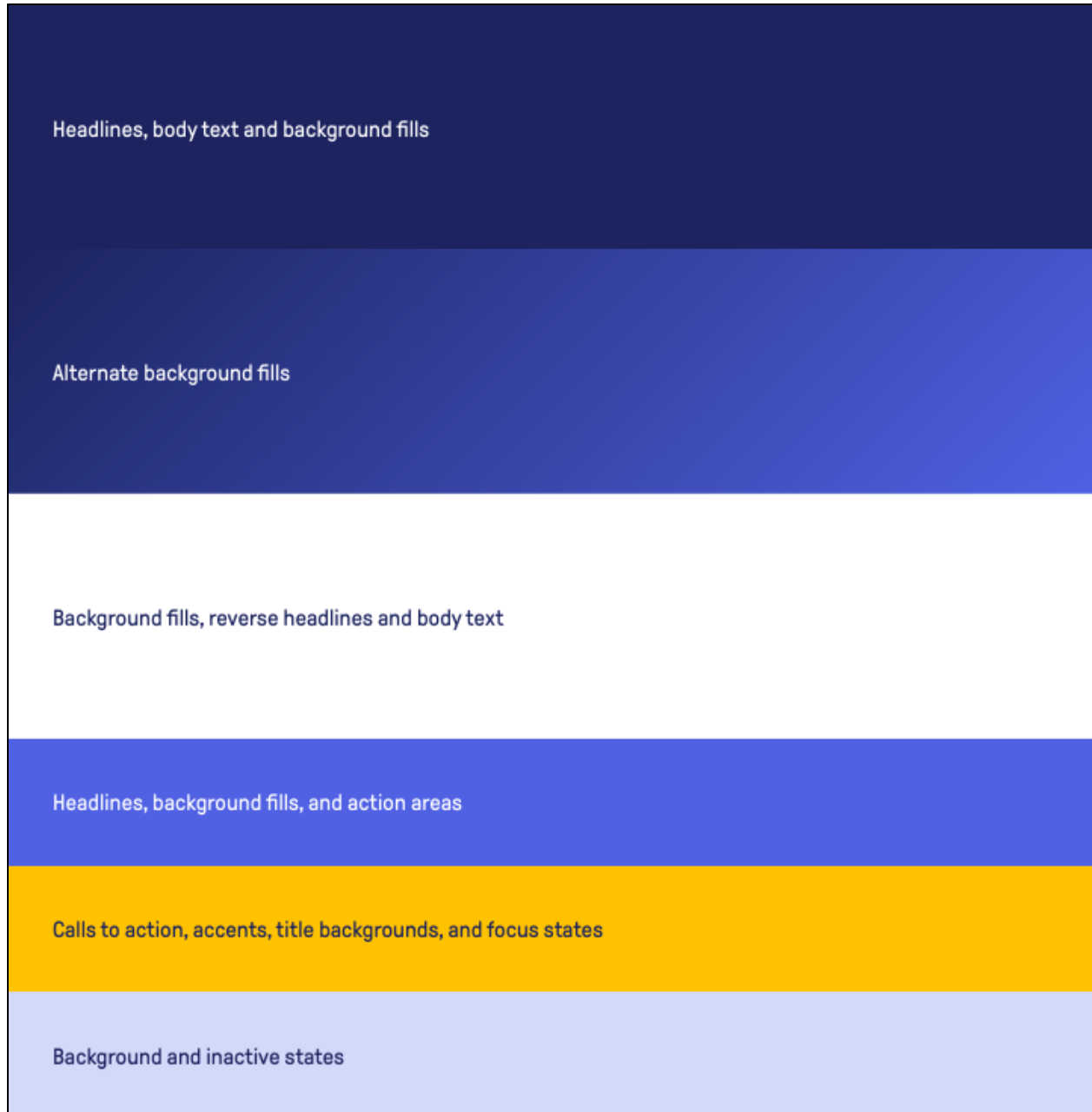
### TINTS

Only use tints when the main colors need to be toned down to ensure good visibility, improve contrast for a specific medium, or meet ADA compliance requirements.



### 7.3.3 COLOR USAGE

ILSFA’s colors have several general use cases. The examples listed here include a brief overview of the components that are most commonly set against those backgrounds.



## 7.4. Marketing and Sales Messages

The Program Administrator supplies the suggested language below to assist Approved Vendors in properly marketing the ILSFA program through direct mail, social media, email, press releases, media interviews, media articles, outreach events, and other marketing activities.

When Approved Vendors make initial contact with prospective participants through marketing activities, the Program Administrator recommends using easy-to-understand ILSFA messages. At this initial contact stage, the goal is to build awareness of ILSFA among prospective participants by connecting with their motivations (e.g., savings on electric bills). As participants show more interest and their eligibility is determined, Approved Vendors can provide more technical details about the Program, as detailed in the Sales Messages section.

### 7.4.1 BRAND FOUNDATION AND TONE OF VOICE

The brand foundation establishes the tone, personality, and guiding principles that shape how Approved Vendors should communicate about ILSFA across all channels. When marketing ILSFA, Approved Vendors should be approachable and well-versed in the Program. Approved Vendors are encouraged to market to residents by leading with savings and positioning solar as the means to achieve electric bill savings. Promoting the Program this way is better aligned with the audience's priorities and makes the benefits feel more attainable and worth exploring.

Approved Vendors should market the Program with direct, certain language, focusing on what matters to residents, anticipating potential skepticism, being clear about how the Program works, and, most importantly, being respectful and acknowledging residents' concerns without pressure.

### 7.4.2 MARKETING MESSAGES

The Program encourages Approved Vendors to follow the language provided below when marketing the Program to residents. Approved Vendors can also utilize the key message framework provided by ILSFA's marketing team by emailing [marketing@illinoisSFA.com](mailto:marketing@illinoisSFA.com).

#### PROGRAM DESCRIPTION

Illinois Solar for All is a state program that may result in income-eligible residents saving money on their electric bills. Whether through solar installations or Community Solar subscriptions, the Program makes solar energy work for households that need it the most.

Created by the State of Illinois, the Program may result in income-eligible participants saving money on their electricity bills while supporting the state's renewable energy goals. Participants save money and make a positive impact on the environment.

#### HIGH-LEVEL MESSAGES

- Illinois Solar for All is a state program designed for income-eligible households, non-profit organizations, and public facilities to save money on their electric bills with solar.
- Illinois Solar for All is designed to ensure that participants pay less for electricity than they would if they had not joined the Program. These savings are built into how the Program works, reducing overall electricity costs through solar.
  - Participants save money on electricity because of how the Program is structured, not due to time-limited offers.
  - For distributed generation projects, participants save because they use electricity generated by solar panels, which reduces how much electricity they need from their utility company.
  - Participants still save even when some days are overcast and across seasons. While solar production varies from day to day, the Program is designed so that savings are realized over time, based on how the system performs throughout the year.
  - This isn't a promotional offer or temporary deal. It's a state program designed to help income-eligible households pay less for electricity through solar energy.
- Illinois Solar for All may result in savings by requiring approved solar companies to offer terms that reduce electricity costs for participants. The Program facilitates incentives to these companies, enabling them to install solar projects with pricing that ensures income-eligible participants pay less for electricity.
  - Illinois Solar for All provides incentives to approved solar companies that install solar projects or build Community Solar projects for income-eligible participants. These incentives ensure that

- companies offer no- or low-cost solar options and are designed so participants can save on their electricity bills
  - Only approved solar vendors can take part in Illinois Solar for All. To participate, they must offer terms that ensure savings for income-eligible participants.
  - Approved solar vendors must follow Program requirements, including contracts that specify pricing terms for participants.
  - A key protection built into the Program is that approved solar vendors must structure pricing so that participants pay less for electricity than they would without the Program.
  - The State of Illinois offers this Program to meet its renewable energy goals and to expand solar energy to income-eligible communities.
  - With state and utility funding, Illinois Solar for All pays incentives to solar companies and passes savings on to participants.
- Illinois Solar for All protects participants by requiring solar companies to follow clear program requirements, approved business practices, and transparent pricing—so people can feel more confident about what they’re signing up for.
    - The Program includes consumer protection requirements that shield participants from deceptive marketing, misleading sales tactics, and unfair contract terms. Approved Vendors must follow fair practices as defined by Illinois Solar for All, ensuring participants work with companies that meet the Program’s clear, participant-centered requirements.
    - Illinois Solar for All provides consumer support and a clear complaint process to help participants address issues, reinforcing the Program’s accountability to those it serves.
    - Participants receive straightforward agreements with no hidden fees or unexpected charges, making it easier to understand what they’re signing up for.

### **7.4.3 SUB-PROGRAM LEVEL MESSAGES**

#### **RESIDENTIAL SOLAR (SMALL)**

Illinois Solar for All (ILSFA) is a state program designed for income-eligible homeowners to save on their electric bills with onsite solar installations.

- Panels reduce the amount of electricity you need from your utility. You pay less for electricity than you would if you were not participating in the Program. Homeowners of single-family homes and 2-4-unit multifamily building owners will have no upfront costs.
- If a contract includes regular payments to the solar company, ILSFA requires that the resulting payments are outweighed by the value generated by the solar system after accounting for restrictions on the maximum allowable payment (i.e., not more than 50% of value generated) and the application of low-income discounts.
- ILSFA is available to homeowners in Illinois whose income does not exceed 80% of the Area Median Income (AMI). If you participate in programs like SNAP or Medicaid, you might already qualify.

#### **RESIDENTIAL SOLAR (LARGE)**

Illinois Solar for All is a state program designed for multifamily property owners and tenants to save on their electric bills through an onsite solar installation.

Electric bill savings are required by ILSFA.

- ILSFA is designed so that you pay less for electricity than you would without joining the Program. Owners of 5+ unit buildings may have small upfront costs.

- Panels reduce how much electricity you need from your utility. You pay less for electricity than you would if you were not participating in the Program.
- If a contract includes regular payments from a master-metered building owner to the solar company, those costs will not exceed 50% of the value of the electricity generated by the solar system, ensuring you save money.
- If you own or manage a 5+ unit multifamily property, at least half of the units must be occupied by households with incomes of 80% or less of the area median income (AMI).

## **COMMUNITY SOLAR**

Illinois Solar for All (ILSFA) is a state program designed for income-eligible homeowners and renters to save on their electric bills through solar subscriptions.

- Eligible renters who receive an electricity bill can save by subscribing to a shared solar project through Community Solar.
- Community Solar allows residents within utility areas to subscribe to the shared, off-site solar project. Residents receive electricity bill credits based on their portion of electricity generated from the solar project.
- Illinois Solar for All Community Solar subscriptions result in you paying less than you would without joining the program. Savings are required by the program.
- Most Community Solar subscriptions do not have an upfront payment to sign up. However, subscribers in Community Solar projects organized as co-ops may incur a nominal upfront fee.
- To ensure savings, your subscription fee will never be more than 50% of the value of your Community Solar credits.

ILSFA is available to renters and homeowners in Illinois whose income does not exceed 80% of the area median income (AMI) and who reside in the same electric utility territory as the Community Solar project. If you participate in programs like SNAP or Medicaid, you might automatically qualify.

## **NON-PROFIT AND PUBLIC FACILITIES**

- Nonprofit leaders and public administrators can lower electricity costs for their organizations by installing solar panels directly on their property through Illinois Solar for All.
- Ongoing fees will not exceed 50% of the value of the electricity generated by the solar project, ensuring savings.
- ILSFA is available to organizations located in an Environmental Justice Community, Income-Eligible Community, or an adjacent census block to an Environmental Justice Community or Income-Eligible Community.
- Nonprofit organizations or public facilities are eligible if they provide critical services, such as hospitals, houses of worship, senior centers, food pantries, libraries, or are a department or agency that delivers essential community services.

## **7.4.4 SOCIAL MEDIA**

Social media can be used to promote the ILSFA program to potential participants. When promoting the Program on their own channels, Approved Vendors are encouraged to tag Illinois Solar for All's social media accounts in their posts. Tags allow the ILSFA program to cross-promote opportunities and help create legitimacy for Approved Vendors.

## ILLINOIS SOLAR FOR ALL ACCOUNTS

- Facebook: [Illinois Solar for All](#)
- LinkedIn: [Illinois Solar for All](#)
- Instagram: [@illinoisSFA](#)
- YouTube: [@illinoisSFA](#)

## SAMPLE FACEBOOK, LINKEDIN, AND INSTAGRAM POSTS

Illinois Solar for All helps income-eligible residents and the organizations that serve them save money on their electric bills through onsite solar installations and Community Solar subscriptions. Contact us or visit [www.illinoisSFA.com](http://www.illinoisSFA.com) to get started. #ILSFA

- We work with Illinois Solar for All to bring solar energy to residents and organizations in income-eligible communities. Contact us or visit [www.illinoisSFA.com](http://www.illinoisSFA.com) to get started. #ILSFA
- Want to save on electricity bills? Connect with us to learn about the Illinois Solar for All program. Contact us or check out [www.illinoisSFA.com](http://www.illinoisSFA.com) to see if you're eligible. #ILSFA

## PREFERRED HASHTAG

- #ILSFA

## 7.4.5 PROMOTIONAL STATEMENTS

### WHAT IS ILLINOIS SOLAR FOR ALL?

After introducing prospective participants to ILSFA, Approved Vendors can provide more technical details about ILSFA in their sales conversations. Approved Vendors and their agents and subcontractors shall not make any demonstrably false or misleading statements. Approved Vendors and their agents and subcontractors shall accurately portray the nature of solar power and RECs and disclose their intent to sell the project's RECs.

The Program's technical aspects can be harder for residents to understand. We encourage Approved Vendors to explain technical aspects in one-on-one conversations. However, if Approved Vendors want to introduce some technical language in marketing materials, they can utilize the following messages:

#### Acceptable Messages

- Illinois Solar for All is designed to require Approved Vendors to offer contract terms that ultimately reduce electricity costs for participants. The program provides incentives to Approved Vendors, enabling them to install solar projects with pricing that may result in income-eligible participants paying less for electricity.
- The program provides payments in exchange for 15 years of Renewable Energy Credits (RECs) generated by solar projects. ILSFA enables the sale of RECs produced by qualified systems to Illinois utilities or to the Illinois Power Agency (IPA). Payments vary depending on the project type, system size, and location.
- Illinois Solar for All provides incentives to approved solar companies that install projects for income-eligible participants. These incentives ensure that the companies can provide no- or low-cost solar installations, so participants can save with solar energy.
- If you sign a contract with us and our application to ILSFA is approved, the solar panels we install on your roof will be part of the ILSFA program.

#### Unacceptable Messages

Examples of statements companies **MAY NOT** make related to ILSFA:

- “The ILSFA program gives out free solar panels.”
- “We represent the ILSFA program.”
- “We are in a partnership with ILSFA.”
- “The ILSFA program pays incentives to income-eligible households.”
- “The ILSFA program gives RECs to participants.”

## **WHAT ARE RECS, AND WHY ARE THEY VALUABLE?**

Renewable energy credits (RECs) are created when renewable energy generation systems, such as solar panels, generate electricity. However, RECs are not the electricity itself. Instead, RECs represent the environmental attributes of that electricity. RECs can be bought and sold, and whoever owns the RECs has the legal right to say they used that clean or renewable energy.

Under Illinois law, utilities are required to supply a certain amount of their energy from renewable sources through the purchase and retirement of RECs. If the RECs from a participant’s solar project are transferred to a utility or the IPA through the ILSFA program, then that participant should not claim to be using clean or renewable electricity. Thus, Approved Vendors and their subcontractors may not suggest that participants participating in ILSFA will receive or use renewable electricity.

### **Acceptable Messages**

Examples of statements companies **MAY** make related to RECs and the energy produced by the system:

- “The renewable attributes (RECs) of this electricity will be sold by us to keep the cost of your panels affordable.”
- “Your solar panels will help Illinois reach its renewable energy goals.”
- “Your solar panels will create energy from the sun.”
- “Your solar panels will contribute to the state’s development of solar power.”

### **Unacceptable Messages**

Examples of statements companies **MAY NOT** make related to RECs and the energy produced by the system:

- “Your home will run on cleaner, greener energy.”
- “The sun will provide your electricity.”

## **WHAT IF I’M NOT ELIGIBLE FOR ILLINOIS SOLAR FOR ALL?**

Illinois residents who do not meet the income qualifications for Illinois Solar for All have another option to go solar: [Illinois Shines](#) is another state program that offers incentives for onsite solar and solar subscriptions.

## **HOW MUCH CAN I SAVE WITH ILLINOIS SOLAR FOR ALL?**

ILSFA requires that all eligible Residential Solar (Small) participants see no upfront costs, and owners of Residential Solar (Large) may see low upfront costs. ILSFA requires that all ongoing costs and fees to participants do not exceed 50% of the Total Value of Electricity for their share of the system (calculated without accounting for the LIDR). This savings requirement is measured in the first year as well as over the term of the contract for that participant. For example:

- If a Residential Solar participant’s first-year Total Value of Electricity estimate on their Disclosure Form is \$1,000, their total costs and fees (minus any utility rebate retained by the customer) must not exceed

\$500 for that year. Similarly, over a 15-year contract, if the system's energy value is \$15,000, the participant's savings must be at least \$7,500 over that period.

- If a property owner or manager of an eligible multifamily building that installs a solar project anticipates a first-year Total Value of Electricity estimate of \$1,000, they must pass on no less than \$500 in additional services to tenants indirectly (through lowered rents, stabilized rents, or other services or improvements).

### Acceptable Messages

Examples of statements companies **MAY** make related to whether or how participants will save money:

- Illinois Solar for All is designed to ensure that participants pay less for electricity than they would have if they had not joined the Program. These savings are built into how the Program works, reducing overall electricity costs through solar.
- Participants save money on electricity because of how the Program is structured, not due to time-limited offers.
- Illinois Solar for All is designed to require approved solar companies to offer contract terms that ultimately reduce electricity costs for participants.
- If a contract includes regular payments to the solar company, ILSFA requires that the resulting payments are outweighed by the value generated by the solar system after accounting for restrictions on the maximum allowable payment (i.e., not more than 50% of value generated) and the application of low-income discounts.
- Your monthly subscription fee will never be more than 50% of the value of your Community Solar credits.

### Unacceptable Messages

Examples of statements that companies **MAY NOT** make related to whether or how participants will save money:

- "If you participate in ILSFA, you will save 50% on your energy bills."
- "ILSFA guarantees 50% savings for all participants."
- "If you subscribe to an ILSFA Community Solar project, you will save 50% on your energy bills."
- "ILSFA guarantees 50% savings for all Community Solar subscribers."
- "There are no fees or ongoing costs when you join ILSFA."

## 7.4.6 ENVIRONMENTAL JUSTICE COMMUNITY DESIGNATION

ILSFA sets a goal of allocating no less than 25% of incentives to projects located in Environmental Justice Communities (EJCs) across the state. EJCs are identified using the [Environmental Justice Communities Map](#). Additionally, communities may apply to be an EJC through the self-designation process.

This designation establishes a mechanism for achieving this goal through project prioritization to allocate 25% of incentives to EJCs, as described in Chapter 9. With the passage of CEJA, in addition to this ILSFA allocation goal, a number of other programs and State entities now utilize the ILSFA Environmental Justice Communities Map to inform their programs. The Agency and Program Administrator do not determine how other state agencies utilize the Environmental Justice Communities Map.

Households that reside within a designated EJC are not automatically eligible to participate in ILSFA because of this designation. Households must still qualify based on income. However, one of the eligibility requirements for non-profits and public facilities is being located in an EJC, Income-Eligible Community, or a census block adjacent to an EJC or IEC.

Approved Vendors or their agents and subcontractors will not state that participants will qualify for ILSFA based on residing in an EJC, nor that participants will qualify for an ILSFA Community Solar project solely because they live in an [Income-Eligible Community](#).

View more information about [Environmental Justice Communities](#) and the self-designation process on the ILSFA website.

## **7.4.7 GRASSROOTS EDUCATION ORGANIZATIONS**

As trusted members of their communities, Grassroots Education organizations provide information to income-eligible households on the basics of solar energy and ILSFA's benefits and eligibility requirements. Approved Vendors are encouraged to attend Grassroots Educator meetings when invited but should refrain from reaching out to individual Grassroots Education organizations. If the Approved Vendor has updates on their ILSFA offers, the geographic regions where they operate, or have a change in their primary contact for ILSFA projects, Approved Vendors should reach out to the Program Administrator to coordinate communication of those updates with Grassroots Education organizations rather than notifying Grassroots Educators directly. This policy allows the Program Administrator to inform all the Grassroots Educators of the change to the Approved Vendor rather than informing only one organization.

Additional guidance includes the following:

- If an Approved Vendor would like to attend a Grassroots Education event, the Approved Vendor must notify the Program Administrator before any contact is made with the Grassroots Education organization.
- The Program Administrator will work with the Grassroots Educator to ensure that all Approved Vendors who work in the region served by the Grassroots Educator are invited to the event.
- Conversely, Grassroots Educators may reach out to Approved Vendors to invite them to events but must invite all the Approved Vendors that work in the region.
- Approved Vendors are prohibited from implying there is a singular partnership between the Grassroots Education organization and the Approved Vendor. This includes in-person at events or in writing in marketing materials.
- Additionally, Approved Vendors are prohibited from using Grassroots Education organization names or logos on marketing materials.

## **7.5. Identity and Affiliation Guidelines**

### **7.5.1 ACCURATE PORTRAYAL OF IDENTITY AND AFFILIATION**

Marketing materials shall not refer to the ICC, the IPA, the Program Administrator, or the State of Illinois in any manner that is deceptive or misleading, including, but not limited to, implying or otherwise leading a participant to believe that an Approved Vendor is soliciting on behalf of, or is an agent of, the ICC, the IPA, or the Program Administrator. An Approved Vendor may state the fact that it is an Approved Vendor under the IPA's ILSFA program.

#### **USE OF UTILITY NAME AND LOGO**

An Approved Vendor or its agent shall not use the name or logo of a public utility in any manner that is deceptive or misleading, including, but not limited to, implying or otherwise leading a participant to believe that an Approved Vendor is soliciting on behalf of a utility.

An Approved Vendor or Designee shall not utilize the name or logo of a public utility or consumer group in any manner that is deceptive or misleading. An Approved Vendor or Designee may use a utility name:

- To describe the service territory in which an offer is valid
- In describing or referencing distributed generation, net metering, or Community Solar subscription bill credits, provided that the use of the utility name does not inaccurately imply utility affiliation or endorsement

Except for these two exceptions, an Approved Vendor or Designee shall not use a utility name, logo, insignia, graphics, or wording that has been used at any time to represent a public utility or its services, in marketing materials, or to identify, label, or define any of its offers, unless it has received approval of the use in advance by the Program Administrator. If there is any doubt as to the propriety of the use of a utility name, it is recommended that the entity seek Program Administrator pre-approval.

An Approved Vendor or its agent shall not use the name or any other identifying insignia, graphics, or wording that has been used at any time to represent the ICC, the IPA, or the Program Administrator, or their services to identify, label, or define any of its offers. This does not, however, restrict the use of a utility name in describing where an offer is valid.

## **7.5.2 PARTICIPANT TESTIMONIALS**

Approved Vendors may use testimonials to advertise participant experience. Actual participants must provide all testimonials. All testimonials must include a disclaimer that participant experiences may differ. The IPA may request documentation to validate the accuracy of testimonials, including verification of the identity of the testifier. Testimonials cannot include language that makes false claims. Testimonials cannot violate any of the above restrictions; for example, using a utility executive or government official to endorse an Approved Vendor.

Participant testimonials are subject to marketing review to ensure the testimonial does not misrepresent the Program's offerings or otherwise violate the requirements of this section. This review process does not apply to any person's expressions of opinion of the Program or other forms of constitutionally protected speech that do not include inaccurate information about the ILSFA program.

Due to the complexities of testimonial creation, testimonial reviews are not subject to the timeframes reflected in the Marketing Review Process.

The IPA and the ILSFA Program Administrator will address any requests for exceptions to the requirements of this section on a case-by-case basis.

## **7.6. Program Administrator Review Process**

All marketing and promotional materials, printed or digital, produced by Approved Vendors, Designees, subcontractors, and agents must be submitted to the ILSFA Program Administrator for review. This includes all materials related to the sale, financing, or installation of solar projects that apply to participate in ILSFA.

Approved Vendors, Designees, subcontractors, and agents must notify the Program Administrator prior to any media interviews or disseminating press releases related to the ILSFA Program to confirm that Program benefits are conveyed clearly and accurately.

This review process does not apply to any person's whistleblower activity, expressions of opinion or criticism of the Program, or other forms of constitutionally protected speech that do not include inaccurate information about the ILSFA program.

Approved Vendors are asked to agree to the terms of the ILSFA marketing guidelines outlined in sections 7.3 to 7.5 of this Manual. The ILSFA Program Administrator recognizes that Approved Vendors, Designees, subcontractors,

and agents may need to adapt ILSFA messages or create new materials for their specific participant or location. This section provides information on how to submit these marketing materials for review and approval by the Program Administrator.

1. Approved Vendors, Designees, subcontractors, and agents should ensure all marketing materials are consistent with the ILSFA branding, messaging, and affiliation guidelines outlined in sections 7.3 to 7.5 of this Manual.
2. Approved Vendors, Designees, subcontractors, and agents should submit all marketing materials to the Program Administrator for review and approval four weeks prior to distribution. Send design files of marketing materials and proofs of promotional items to [marketing@illinoisSFA.com](mailto:marketing@illinoisSFA.com).
3. The Program Administrator will review the materials and provide feedback by email within two weeks of receiving the materials. The Program Administrator has the right to modify and edit original text, images, and layout in compliance with the ILSFA program brand guidelines. Please note that the recommended modifications may affect an Approved Vendor, Designee, subcontractor, or agent's planned distribution date.
4. The Approved Vendors, Designees, subcontractors, and agents must agree to make changes to marketing materials as requested by the IPA or the Program Administrator in an effort to ensure that these materials are not deceptive, confusing, or misleading and to ensure further that the materials do not feature misrepresentations of the Approved Vendor, Designee, subcontractor, or agent's relationship to the IPA or the ILSFA program. Failure to do so will result in a violation of consumer protections, as outlined below.
5. The Approved Vendors, Designees, subcontractors, and agents will have one week to re-submit the modified materials to the ILSFA Program Administrator for approval before they are distributed. The Program Administrator will also have one week to confirm that the edits were applied.
6. If the modified materials do not reflect the changes requested by the Program Administrator or have additional changes that were not requested, the Approved Vendor's materials must be reviewed again, resetting the four-week review period.

## 7.7. Violation of Marketing and Consumer Protection Requirements

If the Program Administrator believes an Approved Vendor, Designee, subcontractor, or agent is not acting, or has not acted, in compliance with ILSFA program requirements in connection with the Program, the Program Administrator will notify the entity via the processes and procedures outlined in the Consumer Protection Handbook. With the limited exception of emergencies requiring immediate action (as determined at the discretion of the IPA), no disciplinary determination (such as the suspension or revocation of the ability to participate as, or on behalf of, an Approved Vendor) will be made by the Program Administrator without first providing the allegedly offending party the opportunity to offer a written or oral explanation of the problematic behavior.

After a review of any such response, the Program Administrator will determine what pre-disciplinary or disciplinary action, if any, should apply to the Approved Vendor, Designee, subcontractor, or agent. All disciplinary determinations made by the Program Administrator will be communicated through a written explanation of the determination that includes the following:

- A brief explanation of the infractions for which the entity is being disciplined
- A timeline of communications between the offending entity and the Program Administrator
- Specific reference to which specific Program requirement(s)/guideline(s) the offending entity violated
- An explanation of any disciplinary action, including what specific conduct is no longer permitted in connection with the Program through the length of the suspension

- An explanation regarding how the Approved Vendor, Designee, subcontractor, or agent may appeal the disciplinary determination to the IPA and the deadline for submission applicable to any appeal

The Program Administrator will provide a copy of any disciplinary determination to the IPA. To appeal a pre-disciplinary or disciplinary action to the IPA, an Approved Vendor, Designee, subcontractor, or agent should follow the appeals process in Section 1.4 of this Manual.

If you have additional questions on topics that are not addressed here, or seek clarity on a specific application of these guidelines, the Approved Vendor, Designee, subcontractor, or agent should first reach out to the Program Administrator. The Program Administrator will review any requests for exceptions on a case-by-case basis.

The IPA and the Program Administrator reserve the right to produce standardized marketing materials and to require the Approved Vendor, Designee, subcontractor, or agent to use those materials to supplement whatever other materials they may use.

## 8. Project Submission Processes

### 8.1. Project Submission Process Overview

Note that prior to the launch of each project annual submission window, a detailed schedule will be released by the Program Administrator according to the following guidelines.

#### 8.1.1 PROJECT SUBMISSION WINDOW

Part I project submission begins with a pre-determined project [submission window timeline](#) for each sub-program, to be announced by the Program Administrator. A single project can only be submitted into one sub-program during a given Program Year. To prepare for initial submission windows, Approved Vendors are able to draft projects and batches for submission after the Program Year begins but before the submission window opens. Application requirements must be completed before submission during the project submission windows as outlined in Section 8.5 of the Approved Vendor Manual. Placeholder documentation is not allowable during the submission windows and submission of incomplete applications during the submission windows is subject to disciplinary action and will result in project removal.

If funds for a given sub-program remain available after the initial submission window, project applications will be accepted and reviewed on a first-come, first-served basis for the remainder of the Program Year or until funds are exhausted, whichever comes first. Additional considerations for Small and Emerging Businesses in the form of selection points and early submission access will be detailed in the Project Selection Protocol. If annually allocated funds in a sub-program remain at the end of the Program Year, the unused funds will be rolled over to the next Program Year for that sub-program. Additionally, if funds become available due to the withdrawal of any projects during a Program Year and after project selection, those funds may be made available to the next eligible project on the waitlist for that Program Year. The waitlist from each Program Year will not carry over to the following Program Year.

#### CURE PERIOD

After the project review period by the Program Administrator, a cure period, as defined by the Program Administrator in each year's Program Year calendar, will begin for all sub-programs. The cure period allows Approved Vendors the opportunity to correct deficiencies identified by the Program Administrator, including missing, unclear, or incomplete project information. Although the cure period is intended to address these issues, note that Approved Vendors should check all submissions for accuracy, and the Program Administrator may reject

a submission or discipline any Approved Vendor suspected of purposefully submitting placeholder or blank documents.

Approved Vendors must sufficiently address any deficiencies prior to the close of this cure period for those projects to be considered for Part I project approval and project selection. At the Program Administrator's discretion, the cure period may be extended up to two weeks from the last good-faith effort to provide the required information. Projects that do not satisfy requirements during this cure period may be resubmitted during subsequent submission windows.

## **PROJECT AND BATCH SUBMISSION**

The Program Administrator will review all project information submitted according to the requirements and processes outlined below. The process for a project to be submitted to the Illinois Solar for All program generally mirrors that for the Illinois Shines program as described in Section 7.10 of the 2026 Long-Term Plan. The Illinois Solar for All program submits projects for all Approved Vendors through a process similar to the Illinois Shines program, but to expedite the processing of ILSFA projects, there is no minimum batch size. This means a batch can consist of one individual project.

**NOTE:** Applications are not considered submitted to the Program until the application is batched and that batch of applications is submitted via the portal. Completing the individual project forms creates the application, but the final step of submitting the batch is what locks in the submission timestamp and enters the project into the review queue.

## **PROJECT SELECTION**

The project selection process is triggered when any sub-program has a total value of eligible, submitted projects from the initial application time window that is greater than 100% of a given sub-program's annual budget, or less than 100% of the sub-program's annual budget if EJC or Energy Sovereignty carveouts are not met. Section 9 of this Manual provides more detail on the project selection process. Projects selected in this process will have funds allocated and move on to project development if applicable, as well as Part II project submission. A Part I project application may be withdrawn prior to the day of the final project selection; the deadline for withdrawal is included in each year's Program Year calendar.

If the project selection process is not triggered for a sub-program, as discussed more in Section 9 of this Manual, then a Part I application may be withdrawn until the batch is sent to the ICC for approval.

### **8.1.2 ILLINOIS SHINES PROGRAM AND ILLINOIS SOLAR FOR ALL**

While proposed projects may be submitted to both the Illinois Shines program and ILSFA for approval and funding, contracts will be awarded from only one program, not both. Therefore, ILSFA will find that any proposed project that has been approved by the Illinois Shines Program Administrator, and for which the resulting REC contract was sent to the ICC for approval, is no longer eligible for ILSFA. Projects submitted to Illinois Shines must be withdrawn prior to ICC approval to remain eligible for ILSFA. The same holds true for projects approved in ILSFA; once the REC contract is sent to the ICC for approval, the project is no longer eligible for Illinois Shines.

### **8.1.3 PROJECT ASSIGNMENT PROCESS**

A project that has been waitlisted (see Section 9), or otherwise not yet selected for a REC contract, may change Approved Vendors after its Part I application is submitted; the new Approved Vendor must submit documentation (such as email correspondence) showing that the original Approved Vendor, the project host, and the project

owner have consented to have the new Approved Vendor control the ILSFA application and the project's RECs.<sup>63</sup> An Approved Vendor itself may be sold, or the equity ownership of a project may be sold without the Program Administrator's approval, but the vendor or project details should go through the approved steps of the Assignment process and be updated within the online portal. The Buyer and the Program Administrator should be notified. An entire REC contract, or any product orders/batches under a contract, may be assigned in their entirety. It is not possible to assign individual projects within a product order.

While it is not necessary to seek approval from the Program Administrator in advance of this assignment transaction, the Approved Vendor transferring the project and the Approved Vendor receiving the project ("Transferee") must provide the Program Administrator with a binding document wherein both agree that the Transferee shall have rights to the RECs produced by the project and the authorization to represent the project for an ILSFA application. The documentation also must show that the project host and the project owner, if different, consent to the change of Approved Vendor.

Upon the formalization of an intent to transfer, the Approved Vendor must provide written notification to all affected parties. This communication shall confirm that the project's management is being assigned to a new Approved Vendor and must explicitly state that all Program benefits, savings guarantees, and contractual terms remain unchanged as a result of the transition.

Please note that if a project was submitted as co-located with another project, it will continue to be deemed co-located after any change in the Approved Vendor. As a result, any co-located pricing or array layout requirements will still apply after a potential change of Approved Vendor. The transferred project, if Community Solar, could, if applicable, be newly considered co-located after being received by the Transferee Approved Vendor. The co-located pricing provision will only be applicable if the ICC's approval of the second project is within one year or less of the ICC's approval of the first project. If the first project has not yet received ICC approval at the time of the second project's approval, then the co-located pricing provision will apply.

Documents outlining the steps for the Assignment process can be found on the ILSFA website on the [Resource Library](#) page.

## 8.2. Disclosure Forms

The Disclosure Form provides clear and consistent information to prospective participants who are considering an offer under Illinois Solar for All. An Approved Vendor or Designee must submit a completed and properly signed Disclosure Form for each Residential Solar (Small or Large) or Non-Profit and Public Facilities project, or Community Solar subscription. Disclosure Forms are generated and completed in the Approved Vendor Portal and will be available for all ILSFA project types/sub-programs. The Residential Solar (Small and Large) and Non-Profit and Public Facility Disclosure Forms have variations for three different types of offers (system purchase, lease, and PPA).

Approved Vendors must complete and provide a standard Disclosure Form to each Program participant and obtain the participant's signature prior to the contract execution with the participant. The Disclosure Form and contract may be provided to the customer at the same time, but the Disclosure Form must be signed first. The ILSFA

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<sup>63</sup> If a Community Solar project was submitted co-located with another project, it will continue to be deemed co-located after any change of Approved Vendors.

Disclosure Forms include a financial summary of savings and costs, contract terms, system equipment, components, warranty information (if applicable), and high-level information. The forms include the price and an estimate of performance of the system as installed, including projected savings percentage for the first year, and the term of the contract for leases and PPAs or 25 years for purchased projects. Program requirements allow Approved Vendors to calculate savings over 25 years for leases and PPAs with optional or required transfer of ownership within the first 15 years, but the Disclosure Form will not do these calculations.<sup>64</sup> Savings for the first year and the term of the contract are automatically calculated and must meet the minimum savings requirements outlined in Section 5 of this Manual. The Program Administrator reviews the savings calculated by the Disclosure Form to ensure the minimum savings requirement is met.

The Approved Vendor will generate the Disclosure Form using the [Approved Vendor Portal](#) unless otherwise approved by the Program Administrator. The portal will contain an interactive form completed by either the Approved Vendor or one of their approved Designees, and the participant can either e-sign it by using the portal e-signature functionality or print, sign, scan, and upload it to the portal. While the Approved Vendor or their subcontractors can facilitate the Disclosure Form submission process, only the participant can sign the form.

Approved Vendors may not use their own versions of the Disclosure Form (except with prior approval from the Program Administrator as described below), nor are they authorized to edit in any way the Disclosure Form generated in the portal.

A representative of the Approved Vendor shall review the Disclosure Form with the participant before the participant signs it and provide the participant with an opportunity to ask questions prior to signing. Program participants may be presented with the Disclosure Form and installation contract in the same interaction, and following the explanation of the Disclosure Form to the participant, those documents may be executed contemporaneously (with the Disclosure Form signed *before* the installation contract). Terms of the underlying contract between a participant and an Approved Vendor or its subcontractor must be consistent with the terms of the required Disclosure Form. Any statements made verbally must be consistent with the contract and the Disclosure Form.

The ILSFA Disclosure Forms are available in the ILSFA [Approved Vendor Portal](#). The Residential Solar (Small and Large) and Non-Profit and Public Facilities Disclosure Forms have been significantly updated in January 2025 to reflect battery and utility rebates and updated utility net metering rates. The Community Solar Disclosure Forms have not been updated.

### **8.2.1 RESIDENTIAL SOLAR (SMALL AND LARGE) AND NON-PROFIT AND PUBLIC FACILITIES DISCLOSURES**

Approved Vendors will create a Disclosure Form for onsite projects in the Residential Solar (Small or Large) or Non-Profit and Public Facilities sub-programs within the Approved Vendor Portal as previously described. A completed Disclosure Form is required for submission of a Part I application. Information from the Disclosure Form is automatically transferred to the application portal to start a Part I application. The information on a Disclosure Form can be updated within the portal prior to participant signing, but cannot be edited after the participant has signed the document (for e-signing) or downloaded the document (for wet signatures), as these actions finalize the form. Approved Vendors may employ commercially available, third-party e-signature systems for participant signature of the Disclosure Form, but must submit the audit/signature information page with the e-signed

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<sup>64</sup> All Residential and Non-Profit and Public Facility lease and PPA contracts must allow the customer to purchase the solar project if the customer moves; compliance with this requirement does not count as a transfer of ownership within the first 15 years for purposes of determining the term for the savings requirement.

Disclosure Form. Note that if the AC size of a system as submitted in Part I differs by more than 5% or 1 KW, whichever is greater, from the AC system size noted in that application's Disclosure Form, a new Disclosure Form will be required (which must be signed by the participant). The current ILSFA Disclosure Forms do not account for LIDR and therefore may overestimate the value of electricity to LIDR customers and in turn, overestimate the estimated savings. Accordingly, the Disclosure Forms currently affected by the LIDR will no longer display the savings calculation.

As a supplementary consumer protection measure, the participant has the right to cancellation within 14 calendar days of executing the contract (as detailed in Section 8.11 of the 2026 Long-Term Plan).

## **8.2.2 COMMUNITY SOLAR**

An Approved Vendor may request the use of an internally generated Disclosure Form system for Community Solar projects as long as they demonstrate their system to the Program Administrator, showing calculations and output that match the portal-generated Disclosure Form. Bulk uploads of both signed Disclosure Forms generated through the Approved Vendor's system, along with signature audit documents and portal-generated Disclosure Forms, must be submitted in the portal as an upload to the project. Use of Disclosure Forms created within an Approved Vendor's system will be limited to subscriptions using a standard offer as described at the time of approval of the internally generated Disclosure Form.

An Approved Vendor of a contracted Community Solar project will be required to identify all known subscribers, including an anchor tenant, and their subscription shares, and submit the subscribers' executed subscription Disclosure Forms with the Part II application at the time of the project's Part II review.

An Approved Vendor or Designee may select a "To Be Determined" option in the Disclosure Form for an Illinois Solar for All Community Solar offer when the terms of the subscription are set, but the specific project for the subscription has not been determined. The Approved Vendor or Designee must assign "To Be Determined" subscribers to a specific Community Solar project within the portfolio listed on the customer's Disclosure Form within 180 days of the date that the customer signed the Disclosure Form, with an option for a 30-day extension of this deadline. Please review the Consumer Protection Handbook for additional requirements.

Participants shall have the right to immediately cancel any ILSFA Community Solar subscription agreement within three calendar days after its initial consummation and to cancel subscriptions at any time with a 30-day notice (as detailed in Section 8.11 of the 2026 Long-Term Plan).

## **8.3. Batches**

Approved Vendors will complete applications on a project-by-project basis but may submit projects in batches to streamline the contracting process. Approved Vendors may submit individual projects or batched projects either during the initial submission window or on a rolling basis if project selection is not required and the sub-program is reopened for submissions. As projects are verified, the Program Administrator may place them into new batches that will result in a contract and/or new confirmations with one utility or the IPA. Utilities (or the IPA) may use one master agreement with multiple confirmations (one confirmation per batch) from an Approved Vendor rather than having multiple contracts with the same vendor. The systems within the batch/confirmation will be listed on a schedule (or product order) attached to the contract and may not be substituted once approved.

Additional details related to Batching can be found in Sections 7.10.1 of the 2026 Long-Term Plan.

A batch may include any combination of project mounting locations within a given sub-program. Project applications will only be reviewed once they have been submitted as part of a batch (although a batch may consist of only one project). The Vendor Managers on the Program Administrator team are available to answer questions and should be viewed as a resource for Approved Vendors throughout the project application process.

The Program Administrator will review each project's application for compliance with Program guidelines and, as needed, request additional information from the Approved Vendor to verify the submitted information and approve the project. A pre-determined cure period to remedy deficiencies will begin after the project submission window has ended. If, after any attempts to cure deficiencies have been made, a project is reviewed and deemed eligible by the Program Administrator, the Program Administrator will forward the batch or individual projects, as applicable, to the Illinois Shines Program Administrator, who will generate the REC contract for all ILSFA projects. The batch and/or individual projects will be assigned to a REC contract with either a utility or the IPA (depending on the source of funds).

See Section 11 of this Manual for more details on the REC contracting process.

## 8.4 Caps on Project Size

To prevent ILSFA residents from receiving residential distributed generation projects or Community Solar subscriptions that generate an excess of net metering credits that the customer cannot use within a year, the IPA has imposed caps on project and subscription capacity sizes based on the customer's historical usage.<sup>65</sup> Large and up to 150% of historical annual usage of the host electricity account for Residential (Small) and Residential (Large) projects, and 200% of historical annual usage for Community Solar subscribers shall apply to all projects beginning with the 2025–2026 Program Year.

The IPA will consider waivers to develop a project up to 200% of the historical annual capacity with accompanying documentation of payment receipt or other written obligation of incorporation of electrification transitions, including, but not limited to, purchase of an electric vehicle, replacement of a fossil fuel heating source with an electric furnace or heat pump, or long-term prescription of in-home medical equipment. Waiver requests shall be submitted to the Program Administrator to determine whether the project is eligible for an exception to the cap on Residential Solar (Small and Large) project size. The Program Administrator may make an electronic form available to facilitate waiver requests. Applicants may request an IPA review of waiver denials. Oversizing a project beyond the allowable caps without obtaining a waiver shall be a violation of Program requirements.

With respect to Community Solar, P.A. 104-0458 allows Community Solar projects up to 10 MW to participate in ILSFA. The Agency is concerned that projects exceeding 5 MW may present a challenge for allocating budgets, due to ILSFA's RERF and utility funding, and carveouts that need to be met. See Section 10.8 for more information.

## 8.5. Part I Project Approval

Applications consist of a Part I and a Part II, and each of these parts must be completed for each participating system. The Part I application is completed in the project planning stage and collects information on a system's planned technical aspects, including size, estimated REC production, equipment, and installation company information. The Part II application is to be completed only when a project has been installed and Energized.

For Part I submission, the Program Administrator reviews each application to ensure that it meets all the requirements of the applicable sub-program. Based on this review, the Program Administrator determines whether the project is eligible or ineligible. Factors that may make a project ineligible<sup>66</sup> include:

- Lack of executed interconnection agreement for Residential Solar (Small and Large) and Non-Profit and Public Facilities projects > 25 kW AC (except as noted previously in the Community Solar sub-program)

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<sup>65</sup> See Sections 8.5.3, 8.5.4, and 8.5.5 of the Long-Term Plan.

<sup>66</sup> This list is only representative, not exhaustive.

- Incomplete and missing documentation (e.g., unsigned Disclosure Forms, no community engagement plans, missing or non-specific community support letters, no site control documents uploaded, missing site photos, or unsupported kWh generation estimate)
- Non-Profit and Public Facilities projects without eligible/approved Critical Service Providers or projects not located in an EJC, IEC, or census block adjacent to an EJC or IEC
- Unresolved documentation inconsistencies
- Use of placeholder documents unless all project documents are submitted on a shared file on the application
- Missed deadlines
- Approved Vendor non-responsiveness

Before submitting project applications, Approved Vendors should ensure the application is complete and accurate.

Project eligibility verification may include a review of the following elements:

For all sub-programs:

- Approved Vendor's registration status in the Illinois Shines program
- System design specifications
- Project location<sup>67</sup> and property owner
- Name of interconnecting utility
- Project type:
  - Residential Solar (Small)
  - Residential Solar (Large)
  - Community Solar
  - Non-Profit and Public Facilities
- Technical project information:
  - Array information (number of modules, module power rating, tilt, and azimuth) for each array
  - Ground-mounted, roof-mounted, or carport (for each array)
  - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking) for each array
  - Inverter information (number of inverters, aggregate inverter size(s) in KW steady-state AC output, which must be equal to or less than nameplate capacity)
  - Inverter efficiency (including transformer loss for designs including transformers on participant side of the meter)
  - System size in DC and AC will be calculated by the portal from the information provided above
- Estimate of first-year energy production
  - Capacity Factor Choice (and Capacity Factor Value, if using Alternate Capacity Factor)
  - Document upload and filename structure

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<sup>67</sup> The project's latitude and longitude (in degrees out to six decimal places, e.g. 41.881856, -87.631222; this information is easily identified through Google Maps) will be requested as *optional* information. Projects in rural locations are strongly encouraged to provide this information. Approved Vendors that submit a significant number of projects with addresses that are difficult to map and have no latitude/longitude information may be asked by the Program Administrator to provide latitude/longitude for all future project applications.

- Utility Bill System Design<sup>68</sup> comprised of ALL the following elements:
  - Site plan (property lines, array, and equipment locations, point of interconnection)
  - One Line Diagram
  - Shading Analysis and System Production Report (e.g., Helioscope, Aurora, PVsys. Model must show system arrays and obstructions and include projected first-year kWh production across the entire proposed system.)
  - UL listing for mounting system equipment: roof mount, pole mount, bracket, tracking system, and more (Cut-Sheet or other method of showing UL certification)
  - Filename structure: [Project #] \_System\_Design\_YYYY\_MM\_DD (e.g., 0001\_System\_Design\_2019\_06\_13)
- Participant data:
  - Document upload: Customer Contract (Residential Solar and Non-Profit and Public Facilities only)
  - Participant contract term start/end date
  - Income verification for all income-eligible participants (unless the participant already received an Income Verification Approval Letter from the Program Administrator), using the directions as follows:
    - For all Methods, use the following file structure to submit Certification and Consent forms: Filename structure: [Project #] Cert and Cons
    - If using Method A or Method C for income verification:
      - Use the following file structure to submit the required documentation: Project#\_Type of Document\_Last Name
      - Remember to redact all personally identifiable information (PII). PII may include the following: ID numbers, such as driver's license numbers, state ID numbers, passport numbers, full date of birth, social security numbers, supplemental security income numbers, taxpayer identification numbers, patient identification numbers, and financial account numbers such as bank accounts. Names and addresses, and partial date of birth (MM/YYYY) must be used for verification purposes. Refer to Section 6.1 and/or Section 6.3 for more details about redacting PII.
    - If using Method B: Do not upload the participant's 4506-C. The Program Administrator can view the information in the third-party credit agency portal to verify eligibility.
    - If the Program Administrator completed income verification:
      - Use the following file structure to submit the Income Verification Approval letter: [Project #]\_IVLetter\_LastName
  - For Community Solar projects, an affidavit that the project is not affiliated with another project that, were they found to be co-located, would create an aggregate size greater than 10 MW and that the parcel has not been divided within the preceding five years. The receipt of the affidavit will not restrict the Agency from investigating and determining whether the project is collocated.
  - For Distributed Generation projects above 25 kW, an affidavit that the project is not affiliated with another project that, were they found to be co-located, would create an aggregate size greater than five

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<sup>68</sup> System Design encompasses the site plan, One Line Diagram, shading and production analysis, and Cut-Sheet showing UL listing for mounting system. This document should include **all four elements**, with each page titled to reflect its content. It should be collated and reviewed by appropriately qualified personnel who check for consistency and accuracy **before** it is submitted to ILSFA.

MW nameplate capacity. The receipt of the affidavit will not restrict the Agency from investigating and determining whether the project is collocated.

- For the Residential Solar (Small and Large) sub-programs:
  - Income verification (following the directions provided above)
  - Site suitability documentation. Refer to Section 14 for more information
  - If generated through portal: Participant’s e-signed Disclosure Form
  - Offers that have an ongoing cost for the customer will be checked that the offer does not result in a higher out-of-pocket cost due to the customer’s LIDR
  - Proof of site ownership such as deed (e.g., warranty or quit claim), title, recent mortgage, homeowner’s insurance, or property tax statement
  - Host acknowledgment or another site control document
  - Affordability Agreement, if applicable
- For the Non-Profit and Public Facilities sub-program:
  - Project site location in an IEC, EJC, or census block adjacent to an EJC or IEC
  - If generated through portal: Participant’s e-signed Disclosure Form
  - Documentation establishing organization type as non-profit or public agency
  - Proof of site ownership such as deed (e.g., warranty or quit claim), title, recent mortgage, property insurance, or property tax statement
  - Host acknowledgment or another site control document
  - Qualifying Tenant Agreement, if applicable
  - Documentation that the organization is a CSP (submitted-with the Part I application) and demonstrated community engagement per Program requirements
  - If “House of Worship” is selected and the project is 100 KW AC or less in size, the applicant will provide both of the following:
    - A signed attestation that states the following: I certify that my name is [CERTIFIER’S NAME] and that I serve as [RELATION TO THE ORGANIZATION] to/for [ORGANIZATION NAME]. I have direct knowledge of [ORGANIZATION NAME]’s use of the property at [ADDRESS]. As required under Section 1-56(b-15) of the Illinois Power Agency Act (20 ILCS 3855/), as amended by Public Act 102-0662, I further certify that the property located at the address above, the site of a proposed new photovoltaic project, qualifies as a House of Worship because it is used exclusively by a religious society or body of persons as a place for religious exercise or religious worship and is recognized as exempt from taxation pursuant to Section 15-40 of the Property Tax Code (35 ILCS 200/). I certify that these representations are true and complete to the best of my knowledge. I understand that these representations will be used for state government purposes and may be verified at any time by the Illinois Power Agency and that the Illinois Power Agency has the right to request documents and other evidence to verify this certification. I also understand that making misleading or false statements in an application for the ILSFA may result in denial of the application or other consequences, including possible Program disciplinary action against an Approved Vendor or its Designee
    - Proof of exemption from taxation pursuant to Section 15-40 of the Property Tax Code (it is acceptable to utilize a sales tax exemption form for this requirement)
- For the Community Solar sub-program:
  - Planned Anchor share
  - Planned Anchor type (non-profit, public facility, other)

- Document upload: Letter of Intent from anchor tenant
- Planned share of income-eligible household subscribers
- Planned non-qualifying share
- Planned small subscriber share (applies only to income-eligible household share)
- 100% subscriber-owned status, description, and supporting documentation
- Proof of site control
- Document upload: Community Partnership Description
- For Community Solar projects, an executed interconnection agreement will no longer be required at the Part I application. However, a Certificate of Completion or Permission to Operate from the interconnecting utility will continue to be required at the Part II application. Signed attestation that the applicant has read and understands the following notice regarding project labor agreement requirements for construction of the project:
  - “Each Community Solar project awarded a REC contract under ILSFA after June 1, 2026, with a nameplate capacity greater than 3 MW AC or co-located with other Community Solar projects such that the overall nameplate capacity of those projects exceed 3 MW AC must enter into a project labor agreement (“PLA”) prior to construction as outlined in P.A. 104-0458. At a minimum, the project labor agreement must provide the names, addresses, and occupations of the owner of the plant and the individuals representing the labor organization employees participating in the project labor agreement consistent with the Project Labor Agreements Act. The agreement must also specify the terms and conditions as defined by Section 1-75(c)(1)(Q)(2) of the IPA Act. After approval of a REC Delivery Contract by the Illinois Commerce Commission, Approved Vendors must file the project labor agreement with the Program Administrator for review and approval as described in Section 15.14 of this Manual..”
- Signed disclosures (wet signatures) if not completed through the application portal
- Plot diagram or site map for all systems
- Photo documentation, as detailed in Section 14.3
- Signed contracts with MWBE subcontractors for any project intending to request MWBE points as a part of Project Selection
- Completed attestation, in a form to be specified by the Program Administrator, that the project will comply with the requirements of the Prevailing Wage Act (820 ILCS 130/1, et seq.), if applicable
- For projects larger than 25 KW:
  - Valid interconnection agreement signed by both the interconnecting utility and the interconnecting participant at project submission except as noted previously. Interconnection agreements whose execution dates are older than 16 months should provide supporting documentation showing that they received an extension.<sup>69</sup> Projects that were forced from the utility interconnection queue due to the utility’s queue management process should demonstrate that they exited the interconnection queue voluntarily and have subsequently reapplied for interconnection.
  - For ground-mounted systems over 250 KW, a land use permit, when applicable, from the Authority Having Jurisdiction (“AHJ”) over the project. In the event a land use permit is not applicable, written confirmation from the AHJ that no permit is required must be provided.
- For systems already energized prior to Illinois Solar for All application:

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<sup>69</sup> The Program Administrator understands that supply-chain, design, and queue related delays may impact a project’s timeline and that installers often receive extensions from the interconnecting utility.

- GATS or M-RETS unit ID
- Document upload:
  - Ameren Illinois participants: Permission to Operate Packet (“PTO”) comprised of two approval emails from Ameren Illinois indicating approval to energize and operate
  - ComEd participants: signed Certificate of Completion (“CoC”) including project information
  - Other utilities and co-ops: signed CoC and supporting documentation as needed to tie to a distributed generation facility
- Document upload: Net Metering Application Approval Letter (if applicable)
- For Residential Solar (Small and Large) and Non-Profit and Public Facilities projects:
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the installation contract with the participant is consistent with the Disclosure Form provided to the participant
  - Attestation of compliance with all installation contract requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for contracts executed before May 10, 2019, were unsuccessful)

Project applications are submitted via the online Approved Vendor Portal, including data entry and document uploads, after which the Program Administrator reviews them. Projects that meet all Program Part I requirements will be deemed eligible, which does not guarantee funding but will allow that project to move forward through the Project Selection Protocol.

## **PROJECT SELECTION AND ICC APPROVAL**

If the sub-program budget is less than 100% subscribed at the end of the initial project submission window, all eligible projects in that sub-program will be sent to the ICC with a recommendation for approval. If the sub-program is more than 100% subscribed, the [Project Selection Protocol](#) will be triggered for all eligible projects in that sub-program. Selected projects will then be sent to the ICC with a recommendation for approval. Generally, the ICC meets [twice per month](#).

Projects approved by the ICC will be contracted with a utility or the IPA. A project submitted in the Program Year must be approved by the second ICC meeting in **July** of the following Program Year to be deemed Part I Approved for the Program Year it was submitted in. If a project is not approved by the ICC before that point, it must be dropped and resubmitted in the new Program Year. After construction, projects move to Part II submission and approval. Projects already installed at Part I approval can move immediately to Part II submission, but will need to create a Part I application for approval to start the process in the Approved Vendor Portal. The Vendor Manager can provide guidance on how to best submit information for already installed systems.

## **PROJECT RESUBMISSION**

In response to the Program’s update of REC incentives and in an effort to eliminate gaming opportunities, projects that have been approved for ILSFA incentives by the ICC will not be permitted to receive a REC price higher than the price available at the time of its first approval for incentives (i.e., an application cannot be withdrawn and resubmitted in order to receive a higher REC price).

## **8.6. Part II Project Approval**

Once a system is completed and Energized (and after ICC approval of the system’s application for a REC contract), the Approved Vendor will complete Part II of the application. Part II will consist of uploading information verifying

the completion of the project and confirming that the specifications have not changed from the Part I application. In addition, the Approved Vendor will provide documentation certifying that the system has received final interconnection approval from the local Electric Distribution Company (“EDC”). General interconnection information is contained in the [Illinois Administrative Code](#). The local EDC will have information on their interconnection request process, including interconnection request forms and approvals, via a page on their website.

For all parties’ administrative ease, Part II submissions will be subject to the requirements as outlined below, including the updated photo review, regardless of the Program Year in which the Part I application was submitted. The Program Administrator reviews each application to ensure that it meets all the requirements of the applicable sub-program, including the factors listed below.

- For all sub-programs:
  - Final technical project information:
    - Actual system size in both DC and AC (if different than the size submitted in Part I, please re-supply the array information)
    - Final (projected) first-year energy production
    - Modules: manufacturer/make, model
    - Inverter: size, manufacturer/make, model
    - Number of tracking axes (fixed tilt, 1-axis tracking, 1-axis backtracking, or 2-axis tracking)—must be the same as submitted in Part I
    - Does this project have a battery backup?
    - Meter: manufacturer/make, model (does the meter meet the ANSI C.12 standard, if required by the applicable registry)
    - Provide a description of any other changes made to the project between the initial application and the completion of the project
    - Interconnection approval date and online date
    - PDF output of final system design (e.g., Helioscope, Aurora)
    - PDF output of final shading analysis
  - System registry information:
    - GATS or M-RETS unit ID
    - Registry in which the system is registered (PJM-GATS or M-RETS)
    - Provide the PJM-GATS or CleanCounts (formerly M-RETS) unit ID
    - Provide the name on the PJM-GATS and CleanCounts (formerly M-RETS) account
    - Provide proof of initiated irrevocable transfer agreement or standing order
  - Financing structure: participant-owned, lease, or PPA (not asked for with Community Solar projects)

**Document upload:**

- Permitting and approvals from the Authority Having Jurisdiction (“AHJ”) when applicable or documentation from the AHJ if permitting and/or approval is not required
- For Ameren interconnections: Permission to Operate (PTO) packet, which includes an approval-to-operate notification email from Ameren Illinois with the signed Certificate of Completion, Installer Certification, and Net Metering Application attached, and a second email that includes completed Acceptance and Final Approval and Level 1 DG Interconnection Application or Level 2-4 Interconnection Application
- For ComEd interconnections: signed Certificate of Completion, which includes project information (e.g., location, type, KW capacity, status)
- For other utilities and co-ops: signed Certificate of Completion and supporting documentation (e.g., interconnection application) that ties the Certificate of Completion to the DG facility

- Installer information (must match the name of a current ICC Certified DG Installer and their ICC verified “Qualified Person”)
- Job trainee employment and demographic and geographic data for all staff (hours, work categories, and qualified program details for all qualified trainees, as well as estimated total employee work hours by work category).<sup>70</sup> See Section 15.2.2 and 15.3.1 for additional details.
- For all projects that are subject to the requirements of the Prevailing Wage Act (820 ILCS 130/1, et seq.), copies of all Certified Transcripts of Payroll (“CTP”) previously reported to the Illinois Department of Labor CTP Portal covering all project construction and installation work.
- Final system cost, including any and all costs related to the following: modules, inverters, other generating equipment, balance of system (“BOS”), engineering/procurement/construction (“EPC”), installation, interconnection, origination, and development, sales/general/administrative (“SG&A”) including participant acquisition, financing, legal, permitting/inspection/other soft costs, contingencies, and any other direct or indirect costs attributable to the project. Any and all profit that results from project development should not be included in the total project cost.<sup>71</sup>
  - Photo documentation, as detailed in Section 14.3
  - For projects that included a commitment to utilize MWBE subcontractors as part of the Project Selection Protocol, invoices of payments to MWBE subcontractors as in the project application
- Proof that the project has initiated an irrevocable standing order without an end date in the REC tracking registry through either a copy of the registry’s email acceptance of the irrevocable standing order or a screenshot of the irrevocable standing order screen showing the registry certification number of the system
- Documenting Energy Sovereignty Transfer of Ownership:
  - When ownership transfer occurs, the Approved Vendor must provide notification and proof of transfer of legal title to photovoltaic generating equipment (e.g., sales or assignment and assumption agreement between the Approved Vendor and the new owner(s), notice of trigger of ownership transfer clause, bill of sale, or similar instrument) to the Program Administrator and the buyer under the REC contract.
- The Approved Vendor must also provide a summary explanation of how the transfer meets the terms of the original ILSFA Energy Sovereignty participant contract, including information on:
  - The cost and timing of the transfer of ownership
  - Transfer of warranties and insurance
  - Cost of ongoing monitoring, maintenance, and insurance within their third-party owner (“TPO”) or power purchase agreement (PPA) participant contract
  - The Program Administrator has made available a form titled Acknowledgement of Energy Sovereignty Transfer to facilitate the collection of the preceding items required to document the Energy Sovereignty transfer of ownership and to ensure Energy Sovereignty transferees

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<sup>70</sup> For Approved Vendors complying with MES, all workforce requirements must be captured in the Combined MES Compliance Plan and Year-End Report.

<sup>71</sup> Note that with respect to information submitted by Approved Vendors into ILSFA, the IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in ILSFA. This includes the assertion of FOIA exemptions for commercially sensitive information or for personally identifying information when applicable in response to a FOIA request and to otherwise protect the confidentiality of commercially sensitive information in response to any discovery request or other request made in connection with formal investigation or litigation.

acknowledge their rights and obligations after the transfer. The form is available in the Operational Resources section of the Approved Vendor Portal.

- Community Solar projects only:
  - Completed Disclosure Forms entered in the Approved Vendor Portal at least 30 calendar days before the planned invoice date for all eligible subscribers, including income-eligible households and the anchor tenant, if applicable
  - Anchor tenant at Energization, including subscription sizes and anchor type (non-profit, public facility, other)
  - Income-eligible household subscribers at Energization, including subscription sizes
  - Non-qualifying subscribers at Energization, including subscription sizes
  - Attestation of compliance with all consumer protection and marketing guidelines published by the IPA for marketing activity that occurred after May 10, 2019
  - Attestation that the subscription contract with each identified subscriber is consistent with the Disclosure Form provided to the participant
  - Attestation of compliance with all Community Solar subscription requirements previously published by the IPA (or an attestation that good-faith, diligent attempts to secure a compliant contract amendment for subscription contracts executed before May 13, 2019, were unsuccessful)
  - All subscriber data from the net-metering utility portal uploaded as an Excel or CSV file

Variations in final system size (in aggregate inverter capacity AC) that exceed the larger of 5 KW or 25% (e.g., system sizes that are larger or smaller than the Part I approved project application) will be rejected and must re-apply.<sup>72</sup> If the AC size difference at the Part II stage does not exceed those limits, the system will remain validly under contract. Provided it remains in the Part II system size requirements, a system that is developed at a size smaller than proposed in the original application will not be eligible for a higher REC price relative to the originally applicable price. Additionally, for any increase in system size at the Part II stage, the price per REC will be changed to the applicable REC price for the final system size. A project's REC payment is based on the quantity of RECs estimated to be produced by the system, and this amount will be considered the lesser of the estimated production in Part I and Part II of the application. In this way, a system that is built smaller than planned will not benefit from excess REC payments that the final system cannot support as a result of its decreased production estimate. Conversely, if a project's final size is larger than the planned size, an increase in the REC payment could present unexpected budget management challenges.

If a project is removed, resubmitted, and then approved within 365 days of the initial removal, the collateral associated with the original system would be applied to the resubmitted system (and any excess refunded to the Approved Vendor); if not, the original collateral would be forfeited. The IPA will reserve the right to request more information on an installation and conduct onsite inspections or audits of projects to verify the quality of the installation and conformance with the project information submitted to the IPA. More details on inspections can be found in Section 14 of this Manual. Projects found not to conform with applicable installation standards and requirements, or projects found not to be consistent with information provided to the Program Administrator and the IPA will be subject to removal from the Program if the deficiencies cannot be remedied. Likewise, Approved Vendors who repeatedly submit projects with such problems may lose their Approved Vendor status.

The Program Administrator will review the Part II application and, upon approval, will notify the Illinois Shines Program Administrator of approval for REC contracting and payment.

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<sup>72</sup> Changes to the DC size of the system are governed by ensuring that the 155% DC/AC ratio is not exceeded; refer to Section 10.12 for the full requirement.

Variations in the system layout between Part I and Part II are not allowed except in the following cases:

- Change in location of the system on a roof or parcel for any DG system or any system for a Community Solar project, which was the only project on a parcel that took part in the project selection process, if held
- Increase in the surface area covered as long as the originally plotted footprint is still entirely covered by the solar array or associated equipment or wiring
- Decrease in the surface area covered as long as the solar array and any associated equipment or wiring remain entirely in the originally plotted footprint
- Changes in location on a parcel made to provide access paths through the solar array in order to access an otherwise stranded portion of the parcel
- Changes in location on a parcel made to account for parcel unsuitability that was not apparent in the Approved Vendor's commercially reasonable investigation of the property when conducting the initial project design
- Switching between rooftop and ground-mounted
- Switching between tracking system types and non-tracked systems is allowed; however, the lower of the Part I capacity factor or Part II capacity factor must be used. Switching tracking system types by itself is not sufficient to qualify for an exception. At least one additional criterion herein must be met to qualify for an exception.

Approved Vendors may request approval for other changes; such approval will be granted if the Approved Vendor can demonstrate to the Program Administrator that the change was made due to factors that were not apparent in the Approved Vendor's commercially reasonable investigation of the project when conducting the initial project design and that the change would not constitute gaming of the project application or selection process.

## 8.7. Development Timelines and Extensions

Following a project coming under an ILSFA REC contract, if the project is not completed by the Scheduled Energized Date and has not been granted an extension of that deadline for completing Part II Approval,<sup>73</sup> the project will be removed from the schedule on its contract, and the REC volume associated with the project will be eliminated. The Approved Vendor will also forfeit the posted collateral associated with the project.

A project that is not completed in time and deemed canceled may be subsequently included in a future batch submitted by an Approved Vendor but will be treated as a new system rather than a resubmitted system and will receive a REC price applicable at that time.

The Agency will grant extensions under the following circumstances:

- An indefinite extension will be granted if a system is electrically complete (ready to start generation), but the utility has not approved the interconnection. The Approved Vendor must document that the interconnection approval request was made to the utility within 30 days of the system being electrically complete yet not processed and approved.
- A six-month extension will be granted for documented legal delays, including permitting delays.

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<sup>73</sup> Per Section 7.11.1 of the 2026 Long-Term Plan, Community Solar projects will now be given 36 months to be developed and Energized (Part II Approved) and to demonstrate that they have sufficient subscribers. Distributed generation projects are given 18 months to be developed and Energized (Part II Approved).

One six-month extension will be granted upon payment of a refundable \$25 per KW extension fee for DG and Community Solar systems. In addition, if the designated system is a Community Solar system, an additional six-month extension will be granted upon payment of an additional refundable \$25 per kW extension fee. This second extension is only available for Community Solar systems and it is only for achieving the required subscriber rate, not for project completion and Energization. The extension fee(s) would be payable to the contracting utility and would be refunded as part of the first (or only for systems up to 10 KW) REC payment.

The IPA may also, but is not required to, approve additional extensions for demonstration of good cause (e.g., supply chain issues). The IPA is aware of potential delays in receiving updated interconnection cost estimates (particularly for Community Solar projects on a crowded feeder queue) that could delay system completion timelines, possibly pushing electrical completion beyond the period contemplated in the contract at no fault of the developer; such delays would qualify as good cause for the approval of an extension. Good cause extensions will be considered with a minimum six-month extension from the Scheduled Energization Date. The IPA generally does not approve requests for extensions exceeding 12 months.

For further process details, please refer to the [Scheduled Energization Date Extension Request Process](#).

## 9. Project Selection and Prioritization

Each Program Year, the Community Solar, Residential Solar (Small and Large), and Non-Profit and Public Facilities sub-programs open project submission windows for Approved Vendors to submit their proposed projects. Submission windows for ILSFA sub-programs may run congruently or separately from one another. Prior to the start of each Program Year, the Program Administrator [publishes a calendar](#) with the submission window timelines for each sub-program. Annual sub-program allocations can be found in Section 8.4.4 of the 2026 Long-Term Plan, but final sub-program budgets for the 2026-2027 Program Year that are inclusive of any rollover funds from the previous program year will be announced once eligibility for all projects submitted in the 2025-2026 Program Year is determined.

After the close of the initial project submission window, the Program Administrator will review project submissions for completeness of documentation and project eligibility. Only project submissions determined to be complete and eligible will proceed to project selection. If the total incentive values of the eligible applications exceed the available funding, then projects submitted during the initial project submission window will be evaluated according to the Project Selection Protocol. If the total incentive values do not exceed the sub-program's available funding and any carveout thresholds are met, all eligible projects submitted during the initial project submission window will be selected. Selected projects are then sent to the ICC for approval. Project applications for sub-programs with available funding remaining after the close of the initial submission window will be reviewed on a first-come, first-served basis. Projects may still be submitted after the initial project application window closes until the earlier of (i) the end of the Program Year; or (ii) when the Program Administrator announces that all sub-program funds have been allocated for that Program Year. This process will be described in more detail below.

For each Program Year, 25% of each sub-program budget will be reserved independently for EJC projects and Energy Sovereignty projects, respectively. However, on January 1 of the Program Year, remaining Energy Sovereignty carveout requirements will be reduced based on any EJC-selected projects that also qualify with Energy Sovereignty, and that amount will be made available for any remaining projects in the respective sub-program. These 25% carveouts will not be earmarked for either RERF or utility funding. Any unused Energy Sovereignty or EJC carveout funds would roll over to the same sub-program's budget in the next Program Year. Any

funds made available from reductions in final REC contract values will also be rolled over to the same sub-program budget in the following year.<sup>74</sup>

View the [Project Selection Protocol](#) for the 2026-2027 Program Year. The Project Selection Protocol describes how projects will be selected for ILSFA REC contracts in the event that project applications received during the project submission window for a given sub-program exceed that sub-program's available annual funding.

## 9.1 Use of Project Selection Protocol

The Project Selection Protocol is triggered when the total incentive value of a sub-program's eligible projects is greater than the amount of funding available for that sub-program. In the case of Residential Solar (Small and Large) sub-programs, the Project Selection Protocol is triggered based on the incentive values of projects in two sub-categories: one- to four-unit projects and five or more unit projects.

### 9.1.1 WAITLIST PROCESS

Should unselected eligible projects remain following the completion of the Project Selection Protocol, they will be put on ranked waitlists. Any project waitlists in a sub-program (including a waitlist created under the "First-Come, First-Served" process described further below) will be treated as follows:

Within a sub-program, if a project previously selected for that Program Year later withdraws from ILSFA during the same Program Year, the newly available budgetary capacity will be used to select the highest-ranked unselected projects on the relevant waitlist, if any. If the withdrawn project causes the remaining selected EJC projects, in aggregate, to dip below 25% of the sub-program's budget, the highest-ranked EJC projects will receive a preference with the goal of reaching 25%. The same prioritization will apply if the withdrawn project causes the value of the remaining Energy Sovereignty projects to fall below 25% of the sub-program budget.

Note that Approved Vendors given a resizing decision have 15 business days to notify the Program Administrator of whether they will accept or refuse the resizing offer. The Program Administrator presents resizing decisions to the Approved Vendor when the amount of funding that remains available for the Program Year in a given sub-program is less than the next waitlisted project's submitted REC incentive value.

Eligible but unselected projects from the previous Program Year may re-apply for the next Program Year; however, those projects are given no additional consideration in the next Program Year for having been on the waitlist. In this case, the same previously submitted project information and documentation can be used within the online Approved Vendor Portal unless otherwise noted. The Approved Vendor will be required to certify that the project information and documentation remain valid.

### 9.1.2 FIRST-COME, FIRST-SERVED PROCESS

If a sub-program has available funding within any of the funding categories, EJC, Energy Sovereignty, or non-reserved, following its initial project application window, a rolling project submission window will open on a first-come, first-served basis for that category. This could happen due to the following circumstances:

- The total incentive value from the sub-program's initial eligible project submissions is lower than the sub-program's available funding;
- If the 25% reserved portions of the sub-program budget are not filled with EJC and Energy Sovereignty projects through the Project Selection Protocol; or

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<sup>74</sup> See Section 8.10.2 of the 2026 Long-Term Plan.

- Previously selected projects withdraw, and the waitlist is empty.

The first-come, first-served application process will apply through the last day of the Program Year or until the remaining portion of the sub-program budget is allocated and will be subject to the same capacity reservations for EJC and Energy Sovereignty projects as the initial project application window.

Projects will be considered throughout the Program Year in order of their Part I batch submission date. A waitlist will be created upon the exhaustion of the 50% non-EJC and non-Energy Sovereignty portions of the sub-program budget, or 100% of the total sub-program budget (whichever comes first); projects may then still apply until the last day of the Program Year to be placed in order on the Program Year's waitlist. Once again, this waitlist is only used in the case of withdrawal of a previously selected project; the waitlist will not be used for subsequent Program Years. Once the 50% non-EJC and non-Energy Sovereignty portion of the sub-program is exhausted, only EJC and/or Energy Sovereignty projects will be considered. Once a project has been selected and the Approved Vendor has accepted a resize offer, the project is removed from the waitlist and considered selected for the Program.

In general, projects will be allocated first to the utility budget within a sub-program. When a project's selection would exceed the remaining utility annual budget within a sub-program, it will be instead allocated to the annual RERF budget if possible.<sup>75</sup> If neither of those options is possible for a selected project due to constraints in the remaining RERF and utility budgets within the sub-program, the project will be granted the option to resize in the same manner as described in the Project Selection Protocol in order to fit within remaining unused RERF or utility budgets for the sub-program. A project that declines to resize will be placed on the sub-program's waitlist for that Program Year,<sup>76</sup> and the next project will be considered.

A carveout of 25% of each sub-program budget will be maintained for projects in EJCs through the close of the Program Year. Energy Sovereignty carveouts of all sub-programs will be released for any eligible project in a given sub-program on January 1 of the Program Year. At the end of a Program Year, any unused budget capacity in the EJC carveout, as well as any unused RERF or utility budget within the sub-program remaining at the end of the Program Year, will be rolled over to the sub-program budget of the next Program Year. The waitlist from each Program Year will not carry over to the following Program Year.

## 10. System Requirements

### 10.1. Current Laws, Regulations, and Codes

A complete description of the ILSFA program can be found in the IPA's 2026 Long-Term Plan.

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<sup>75</sup> The Agency reserves its right to shift the use of the utility funding as needed among sub-programs, as detailed in Section 8.4.3 of the 2026 Long-Term Plan. As this allocation of utility funding to the sub-programs is not required by law after the initial allocation, the Agency may adjust utility funding between those sub-programs on an as-needed basis if there are available funds in one sub-program and higher demand in another sub-program, with the exception that funds for the Residential sub-programs will not be reallocated.

<sup>76</sup> The 2024-2025 Program Year project waitlist within a sub-program would be eligible for use (including a resizing decision if necessary) for any new sub-program capacity that opens (i) if 2024–2025 project selections withdraw from the program during the 2024–2025 Program Year (with priority given to maintaining the 25% EJC carveout in the sub-program); or (ii) if the 25% EJC carveout for the 2024–2025 Program Year is unfilled by the last day of the Program Year.

ILSFA is administered pursuant to Section 1-56(b) of the [Illinois Power Agency Act \(20 ILCS 3855\)](#), known as the IPA Act, as updated by [Public Act 99-0906](#), known as the Future Energy Jobs Act (FEJA); [Public Act 102-0662](#), known as the Climate and Equitable Jobs Act (CEJA); Public Act 104-0458, known as the Clean and Reliable Grid Affordability Act (CRGA); and others. The IPA is the state agency responsible for the Program's implementation. 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 the Purple Group.

Photovoltaic (PV) system installations will also be subject to local ordinances, regulations, or codes. The ILSFA program requires all installations to adhere to codes established by the Authority Having Jurisdiction of the installation location.

## 10.2. Licensing and Certification

For all ILSFA projects, the PV system installer must have a current [Distributed Generation Installer certification from the ICC](#).

## 10.3. Previously Used Equipment

A project may only use previously used equipment if the Approved Vendor can demonstrate to the Program Administrator: a) that they are providing a warranty equal to that which would be available for the same equipment if it were new; and b) that the participant has been informed of, and agrees to, the use of used equipment. The participant must sign an acknowledgment form stating that previously used equipment will be part of their system and uploaded as part of the Part I project submission. This acknowledgment form will be available in the Approved Vendor Portal, and Approved Vendors are responsible for collecting it from participants.

## 10.4. System Location

All PV systems must be entirely located in Illinois and interconnected to the distribution-level electrical grid of an Illinois investor-owned utility, Illinois electric cooperative, or municipal electric system. Off-grid systems are not eligible for the ILSFA program. PV systems must be built at the location specified in the Part I application and must remain at the approved location for the duration of the 15-year contract and may not be relocated.

ILSFA PV system designs should minimize shading and placement of modules and arrays in low-yield locations to the greatest extent possible.

## 10.5. Interconnection Date

All PV systems must have a final interconnection approval (or equivalent from a rural electric cooperative or municipal electric utility) dated on or after June 1, 2017. For systems installed after June 1, 2017, but before the launch of the ILSFA program, certain conditions are required to meet Program requirements related to consumer protections and participant contracts. Please review those documents/sections for details on satisfying those requirements.

## 10.6. Installer Requirements

While ILSFA does not require using a Qualified Person for installation, the ICC requirements for using a Qualified Person for onsite distributed generation projects still apply. Onsite distributed generation projects must, therefore, be installed by a company with a current [Distributed Generation Installer certification](#) from the ICC.

As such, only the following may perform installation of a Residential Solar (Small or Large) or Non-Profit and Public Facilities system:

- A Qualified Person
- An electrical contractor who is not a Qualified Person, provided he/she is directly supervised by a Qualified Person
- A person who is not a Qualified Person but is enrolled in a training program that, upon satisfactory completion, will meet the requirement to become a Qualified Person provided he/she is directly supervised by a Qualified Person.

Qualified Person means a person who performs installations on behalf of the certificate holder and who has either satisfactorily completed at least five installations of a specific DG technology or has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion:

- An apprenticeship as a journeyman electrician from a DOL-registered electrical apprenticeship and training program
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program
- An Underwriters Laboratories (UL) distributed generation technology certification program
- An Electronics Technicians Association (ETA) distributed generation technology certification program
- An Associate in Applied Science degree from an Illinois Community College Board-approved community college program in the appropriate distributed generation technology

To be considered a Qualified Person, the experience and/or training relied upon must be with the same type of DG technology for which the qualification status is sought.

## 10.7. Expansions

An expansion of an energized system that is already under an ILSFA or Illinois Shines program contract must be independently metered (with a separate GATS or CleanCounts, formerly M-RETS ID) and will be issued a new contract or product order independent from that of the original system. The expansion must comply with all Program rules in effect at the time the expansion application is submitted.

Expansions are subject to the following additional requirements:

- The expansion will only be compensated up to the maximum size limit when added to the original system at that location. Expansions may not result in the aggregated system size exceeding the maximum size limit (5 MW for DG projects, 10 MW for Community Solar projects). The aggregate system size includes both the system to be expanded and any other co-located projects.
- If an existing system is already in place that is not a part of ILSFA or the Illinois Shines program and the expansion is the only portion applying to the Program, then the REC incentive price will be solely determined by the size of the expansion rather than the total system size.
- If a project expansion is submitted more than two years after ICC approval of the original system, then expansion pricing will not apply. However, if the expansion project has already been built and interconnected at the time of project application, the date of interconnection must be more than two years after the ICC approval of the original system. If not, it will be subject to expansion pricing.

For additional details, please refer to the [Co-location & Expansion Project REC Value Flow Chart](#).

## 10.8. Co-Location

Public Act 104-0458, known as the Clean and Reliable Grid Affordability Act (CRGA), amended the definition of co-located for both distributed generation projects and Community Solar projects.

## DISTRIBUTED GENERATION

If two or more distributed generation projects are developed, owned, or controlled by or originate from the same developer or an affiliated developer and the projects serve affiliated loads, then the projects shall be deemed co-located if the projects are located on a single or adjacent parcels. In addition, two or more projects developed, owned, or controlled by or originating from the same developer and serving unaffiliated loads may also be deemed co-located if documentation indicates affiliated management and ownership in the pre-development, development, construction, and management of the projects and the projects are located on a single or adjacent parcels. An Approved Vendor submitting a project in the Residential Solar sub-programs must submit a notarized affidavit attesting that the project is not affiliated with any other distributed generation project, such that if the two projects were deemed co-located, the project would exceed the 5 MW limit.<sup>77</sup> The Agency shall make exceptions on a case-by-case basis if it is demonstrated that projects on one parcel or projects on adjacent parcels are unaffiliated. The receipt of the affidavit will not restrict the Agency from investigating and determining whether the project is collocated. Section 1-75(c)(1)(K)(ii) of the IPA Act prohibits the co-location of Distributed Generation projects with an aggregate nameplate capacity above 5 MW.

## COMMUNITY SOLAR

Section 1-75(c)(1)(iii)(3) of the IPA Act, as amended by CRGA, defines co-located projects as two or more Community Solar projects located on a single parcel or adjacent parcels, unless it is demonstrated that the projects are developed by unaffiliated entities. Section 1-75(c)(1)(K)(iii)(3) also prohibits co-location of Community Solar projects above 10 MW in nameplate capacity. An Approved Vendor who submits an application for a Community Solar project must submit a notarized affidavit attesting that (i) the parcel on which the project is sited has not been subdivided within the five years before submitting the project application and (ii) the project is not affiliated with any other Community Solar project in a manner that would the two projects, if deemed co-located, exceed the 10 MW limit.<sup>78</sup> The receipt of the affidavit will not restrict the Agency from investigating and determining whether the project is collocated.

The REC price for systems determined by the Program to be co-located will be based on the size category for the total size of the co-located projects by that single entity or its affiliates. If no consideration is made for co-located projects, these projects could be structured to inappropriately maximize income from incentives, such as by dividing up a larger project into multiple, smaller projects that individually qualify for higher REC incentives.

### 10.8.1 DISTRIBUTED GENERATION CO-LOCATION

“Co-located” refers to two or more distributed renewable energy generation projects that are located on a single parcel, except for projects where the owner of the applicable retail electric account is confirmed to be unaffiliated and the projects serve distinct electrical loads. Co-location of distributed generation projects occurs when:

- Multiple projects are built on a single parcel, except for projects where the owner of the applicable retail electric account is confirmed to be unaffiliated and the projects serve distinct electrical loads; or
- Multiple projects located on adjacent parcels are developed, owned, or controlled by or originate from the same developer, or an affiliated developer and the projects serve affiliated loads; or
- Multiple projects (on a single parcel or adjacent parcels) are developed, owned, or controlled by or originate from the same developer, and the projects serve unaffiliated loads, if documentation indicates

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<sup>77</sup> 20 ILCS 3855/1-75(c)(1)(K)(ii)

<sup>78</sup> 20 ILCS 3855/1-75(c)(1)(K)(ii)(iii)

affiliated management and ownership in the pre-development, development, construction, and management of the projects.

Additionally, the parcel or parcels may not have been divided into multiple parcels in the two years prior to the project's application to the Program.

The REC price for systems determined by the Agency to be co-located will be based on the size category for the total size of the co-located projects by that single entity or its affiliates. If no consideration is made for co-located projects, these projects could be structured to inappropriately maximize income from incentives, such as by dividing up a larger project into multiple, smaller projects that individually qualify for higher REC incentives.

All distributed generation projects must submit a notarized affidavit at the Part I application attesting that the project is not affiliated with any other distributed generation projects, such that, if the two projects were deemed co-located, the projects would exceed 5 MW nameplate capacity limitation. This affidavit will not restrict the Agency's ability to investigate and determine that a set of projects is co-located. Approved Vendors should endeavor to note in their Part I application if the system is co-located with another existing project in the Program. If possible, Approved Vendors should provide the Application ID number or the project name for the co-located project.

### **10.8.2 CUSTOMERS AND AFFILIATION**

Distributed generation projects will be considered co-located if they are located on a single parcel or adjacent parcels 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.

#### **SIZE**

The size of projects that are considered to be co-located will be the sum of the two projects' total nameplate capacity. For example, if there are two 20 KW AC projects on a single parcel, the total, co-located system size will be 40 KW AC.

Co-located distributed generation projects participating in the Program cannot have a total nameplate capacity larger than 5 MW AC in size.

#### **REC PRICING**

The projects will receive the REC price associated with the total nameplate capacity of both co-located systems. The REC price that the co-located system will receive is the REC price available for the summed system size at the time of the second project's application. If a project that is co-located with another project is submitted more than two years after ICC approval of the original system, then this co-located pricing adjustment will not apply. However, if the second co-located project has already been built and interconnected at the time of project application, the date of interconnection must be more than two years after the ICC approval of the original system. If not, it will be subject to co-location pricing.

#### **AFFILIATIONS**

"Affiliate" means, with respect to any entity, any other entity that, directly, or indirectly through one or more intermediaries, is controlled by or is under common control of the primary entity or a third entity. "Affiliate" includes family members for the purposes of co-location between projects. "Affiliate" does not include entities that have shared sales or revenue-sharing arrangements or common debt and equity financing arrangements. The separate legal formation of Approved Vendors, owners, or developers shall not preclude a finding of affiliation by the Agency. "Control" means the possession, directly or indirectly, of the power to direct the management and

policies of an entity. The Agency may make exceptions on a case-by-case basis if it is demonstrated that projects on one parcel or on adjacent parcels are unaffiliated.

The Program Administrator shall determine affiliation based on evidence that projects either:

1. Share a common origin on a parcel that has been subdivided in the five years before the date of application; or
2. Were pre-developed before the beginning of construction by the same legal entity or an affiliated legal entity.

Evidence of affiliation may include, but not is not limited to:

- Shared personnel
- Common contractual or financing arrangements
- A shared interconnection agreement
- Distinct interconnection agreements obtained by the same pre-development entity and subsequently sold to distinct legal entities
- Familial relationships
- Any demonstrable pattern of coordinated action in the pre-development, development, construction, or management of projects
- Other evidence the Agency deems relevant

The Agency is aware that, in rural areas of Illinois, it is not uncommon for a single parcel to have multiple buildings (and thus distinct load requirements met through distributed generation) that serve separate residential and agricultural uses. The Agency will evaluate requests to consider those uses as non-co-located on a case-by-case basis for the application of this standard.

## **AFFIDAVIT**

All distributed generation projects must submit a notarized affidavit at the Part I application attesting that the project is not affiliated with any other distributed generation projects, such that, if the two projects were deemed co-located, the projects would exceed 5 MW nameplate capacity limitation. This affidavit will not restrict the Agency's ability to investigate and determine that a set of projects is co-located. Approved Vendors should endeavor to note in their Part I application if the system is co-located with another existing project in the Program. If possible, Approved Vendors should provide the Application ID number or the project name for the co-located project.

## **CO-LOCATION WITH PROJECTS NOT PARTICIPATING IN ILLINOIS SHINES**

Prior to P.A. 104-0458, co-located distributed generation projects were permitted to sum to over 5 MW in size if the co-located projects that are participating in the Program remain at or under 5 MW AC size requirement. As of June 1, 2026, this is no longer permitted. Projects may not be co-located such that the aggregate nameplate capacity of the projects exceeds 5 MW AC.

## **10.8.3 COMMUNITY SOLAR CO-LOCATION**

Multiple Community Solar projects sited on a single parcel or adjacent parcels shall be considered co-located, unless it is demonstrated that the projects are developed by unaffiliated entities. Section 1- 75(c)(1)(K)(iii)(3) of the IPA Act prohibits the co-location of Community Solar projects with an aggregate nameplate capacity above 10,000 kW. Community Solar projects that are owned or developed by separate unaffiliated entities may be located on adjacent parcels and will not be considered co-located. If there is a naturally good location from an interconnection standpoint, one owner should not be allowed to prevent another owner from developing a project

in that location. All affiliated Community Solar projects must have a separate interconnection point in order not to be considered co-located.

All Community Solar projects must submit a notarized affidavit at the Part I application attesting that (i) the parcel on which the project is sited has not been subdivided within the last five years and (ii) the project is not affiliated with any other Community Solar projects in a manner that would cause the two projects, if deemed co-located, to exceed the 10,000 kW nameplate capacity limitation. This affidavit will not restrict the Agency's ability to separately investigate and determine whether a set of projects is co-located.

#### **PARCELS**

Community Solar projects will be considered co-located if they are located on a single parcel. Community Solar projects sited on adjacent (i.e., contiguous) parcels will also be considered co-located unless systems are confirmed to be developed by unaffiliated entities. A parcel of land shall not be divided into multiple parcels within the five years before the submission of a project application. If a parcel has been divided within the previous five years, co-location shall be based on the boundaries of the previous undivided parcel.

#### **SIZE**

The size of projects that are considered to be co-located will be the sum of the two projects' total nameplate capacity. For example, if there are two 1 MW AC projects on a single parcel, the total co-located system size will be 2 MW AC. Alternatively, if there are two 1 MW AC projects on adjacent parcels, the total, co-located system size will be 2 MW AC unless affiliation can be disproved.

Section 1-75(c)(1)(K)(iii)(3) explains that Community Solar projects participating in the TCS Category "shall not be co-located with one or more other photovoltaic community renewable generation projects such that the aggregate nameplate capacity exceeds 10,000 kilowatts."<sup>79</sup> Accordingly, co-located Community Solar projects participating in the Program cannot have a total nameplate capacity larger than 10 MW AC in size.

#### **REC PRICING**

The projects will receive the REC price associated with the total nameplate capacity of both co-located systems. The REC price that the co-located system will receive is the REC price available for the summed system size at the time of the second project's application. If a project that is co-located with another project is submitted more than two years after ICC approval of the original system, then this co-located pricing adjustment will not apply. However, if the second co-located project has already been built and interconnected at the time of project application, the date of interconnection must be more than two years after the ICC approval of the original system. If not, it will be subject to co-location pricing. In situations where further, additional co-located projects are submitted, the Agency will consider the "original system" to be the most recent project application with ICC approval in order to determine whether the additional project will be subject to co-location pricing.

#### **AFFILIATIONS**

"Affiliate" means, with respect to any entity, any other entity that, directly or indirectly through one or more intermediaries, is controlled by or is under common control of the primary entity or a third entity. "Affiliate" includes family members for the purposes of co-location between projects. "Affiliate" does not include entities that have shared sales or revenue sharing arrangements or common debt and equity financing arrangements. The separate legal formation of Approved Vendors, owners, or developers shall not preclude a finding of affiliation by the Agency. "Control" means the possession, directly or indirectly, of the power to direct the management and policies of an entity. The Agency may consider the following evidence of affiliation:

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<sup>79</sup> 20 ILCS 3855/1-75(c)(1)(K)(iii)(3)

- Shared personnel
- Common contractual or financing arrangements
- Shared interconnection agreement
- Distinct interconnection agreements obtained by the same pre-development entity that are subsequently sold to distinct legal entities
- Familial relationships
- Any demonstrable patterns of coordinated action in the pre-development, development, construction, or management of photovoltaic community renewable generation projects
- Other evidence the Agency deems relevant

Exceptions will be made if it can be demonstrated that two projects on one parcel or two projects on adjacent parcels are unaffiliated.

#### **AFFIDAVIT**

All Community Solar projects must submit a notarized affidavit at the Part I application attesting that (i) the parcel on which the project is sited has not been subdivided within the last five years and (ii) the project is not affiliated with any other Community Solar projects in a manner that would case the two projects, if deemed co-located, to exceed the 10,000 kW nameplate capacity limitation. This affidavit will not restrict the Agency's ability to separately investigate and determine whether a set of projects is co-located.

#### **SPECIFIC ROOFTOP CO-LOCATION CONSIDERATIONS**

Community Solar projects sited on separate rooftops or structures on adjacent parcels will not be considered co-located unless located on the same building or structure. Multiple Community Solar projects sited on distinct structures located on a single parcel will be considered co-located and must demonstrate that the projects are unaffiliated in order to not be considered co-located.

For additional details, please refer to the [Co-location & Expansion Project REC Value Flow Chart](#).

## **10.9. Site Control**

For project application, the Approved Vendor must provide a written binding contract, option, or other demonstration of site control acceptable to the Program Administrator for all projects where the Approved Vendor is not also the project owner and the host.

## **10.10. Site Map**

The site map must be provided with each application, which shows property boundaries, any structures on the property, and the location of the solar array(s). Roof-mounted arrays must include a map showing the location of the solar array(s) on the roof. All electrical improvements that are not co-located with the solar array must also be shown (e.g., trenching from ground-mounted arrays to the property power source or upgrades to the transmission system). Any modifications planned for the site should also be indicated on the site plan (e.g., removal of trees or other obstructions).

## **10.11. Shading Study**

A shading study shall be completed for all projects. This can be an onsite shading study performed using shading study software or by a person with proven experience performing such studies.

To use the [PVWatts](#) estimated production,<sup>80</sup> a system must meet the minimal shading criterion as follows: No obstruction is closer than a distance (D) of twice the height (H) it extends above the PV array. All obstructions that project above the point on the array that is closest to the obstruction shall meet this criterion for the array to be considered minimally shaded. Any obstruction located north of all points on the array need not be considered a shading obstruction. Obstructions that are subject to this criterion include:

- Any vent, chimney, architectural feature, mechanical equipment, or other obstruction that is on the roof or any other part of the building
- Any part of the neighboring terrain
- Any tree that is mature at the time of installation of the PV system
- Any tree that is planted on the building lot or neighboring lots or planned to be planted as part of landscaping for the building (the expected shading shall be based on the mature height of the tree)
- Any existing neighboring building or structure
- Any planned neighboring building or structure that is known to the applicant or building owner
- Any telephone or other utility pole that is closer than 30 feet from the nearest point of the array

## 10.12. REC Quantity Calculation

The application portal will automatically calculate the PVWatts estimated production. The use of a standard capacity factor is no longer allowed as a method of production estimation used for applications in the ILSFA portal.<sup>81</sup> Approved Vendors may either use a capacity factor calculated in the portal using PVWatts or propose an alternative capacity factor. An applicant will be allowed to choose either of these numbers, rounded down to the nearest REC for the 15-year contract REC delivery amount. Project applications submitted prior to the 2021-2022 Program Year that utilized a standard capacity factor are not impacted. The portal will automatically calculate the PVWatts capacity factor using PVWatts version 8 and the following inputs:

- System address as entered by the Approved Vendor
- Module type: standard
- System losses: 14%
- Array type will be based on Approved Vendor input for system type using the following:
  - Fixed open rack for non-tracking ground mount systems
  - Fixed roof mount for non-tracking roof-mounted systems
  - 1-Axis for single-axis tracking systems
  - 2-Axis for dual-axis tracking systems
- Tilt angle: tilt angle entered by Approved Vendor
- Azimuth angle: azimuth angle entered by Approved Vendor
- DC/AC ratio: actual ratio based on Approved Vendor inputs for DC and AC capacity
- Inverter efficiency: as entered by the Approved Vendor (if blank, a default of 96% will be used)
- Degradation: 0.5% per year (alternative degradation rates will not be accepted)

Applicants can also use an alternative capacity factor, which may be larger than the standard or PVWatts capacity factor if such a selection was obtained using a custom software tool designed to calculate such capacity factors or

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<sup>80</sup> PVWatts is a tool developed by the National Renewable Energy Laboratory to estimate the energy production of photovoltaic (PV) systems.

<sup>81</sup> All capacity factors referenced in this section are average capacity factors calculated over the 15-year REC contract period and incorporating an assumption of 0.5% annual production degradation. The capacity factors are in relation to AC-rated nameplate capacity.

calculated by a professional engineer. Approved Vendors can always choose a number lower than the standard, PVWatts, or alternative capacity factor if they determine it is appropriate. Any arrays 1) with an azimuth greater than 270 or less than 090; 2) with a tilt of greater than 80 degrees; or 3) that do not meet the minimal shading criterion may not use the PVWatts estimate and must use an alternative capacity factor.

Any proposed alternative capacity factor that is calculated using a proprietary third-party software tool may be subject to audit by the Program Administrator. A PDF document must be submitted for each project that, along with the full system design provided in the Part I application, allows the Program Administrator to verify the proposed alternative capacity factor. The requirements for this PDF document are: 1) the shading and production report(s) from the design software used; 2) the shading object(s) input information; and 3) the array input information. Alternately, this may include a requirement that the Approved Vendor provide a copy of the third-party software tool with appropriate licenses to the Program Administrator, as well as providing the proprietary file or all inputs to the tool in a manner that will allow the Program Administrator to replicate the generation claimed. This software licensing will only be required on a case-by-case basis as determined by the Program Administrator, who will conduct both random and targeted audits of alternative capacity factors. Any capacity factor that results in a REC quantity calculation that differs by more than +/-20% from the PVWatts REC quantity calculation requires the Approved Vendor to confirm that the entered capacity factor is intentional.

The Program Administrator will evaluate systems using non-standard technologies such as bifacial panels or seasonally adjusted tilt on a case-by-case basis.

Any capacity factor that is approved for Part I of an application will be the maximum capacity factor that the system may use, even if changes to the final as-built system would result in a higher capacity factor.<sup>82</sup> However, any changes to the system between the Part I and Part II approval that would lower the capacity factor will result in a capacity factor reevaluation and the new, lower Part II capacity factor must be used. The Part II capacity factor cannot be greater than the Part I capacity factor. For the purposes of calculating Part II REC quantities and associated payments, the Project Size used must correspond to the capacity factor applied. If the Part I capacity factor is lower than the Part II capacity factor, the Part I Project Size (in AC) will be used to calculate Part II payment RECs. If the Part II capacity factor is lower than the Part I capacity factor, the Part II Project Size (in AC) will be used. In all cases, the lower of the two capacity factors, and its corresponding Project Size, will be used for calculating payments under the REC contract and the annual REC delivery obligations under the REC contract.

At the Part II application, the Approved Vendor will be asked to update system parameters, if needed. As an additional check, photographic evidence and possibly onsite inspections will be used to verify the final system parameters. If the standard capacity factor was used at the Part I application (prior to the onset of the 2021-2022 Program Year), then the standard capacity factor will continue to be used as the Part II capacity factor and applied to the Part II system size, discussed below. If PVWatts was used in the Part I application to calculate a capacity factor, then PVWatts will be used again based on the updated Part II system parameters to calculate a Part II capacity factor. If PVWatts calculates a higher capacity factor for Part II relative to Part I, the lower capacity factor from Part I will be used. If a custom capacity factor were used at the Part I application stage, the same custom capacity factor (or lower custom capacity factor, if reduced per above) would be used and applied to the Part II

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<sup>82</sup> If errors are made in an application related to capacity factor calculation and discovered prior to Part I verification of the project, the Program Administrator may permit updates to an application's capacity factor if good cause/explanation is provided for the change(s). Still, Approved Vendors should not act in reliance on this and should ensure that application data is accurate and true prior to application submission. If a mistake is made related to a capacity factor calculation, but not discovered until after execution of the REC contract, projects on a 2026 REC contract may be removed from the REC contract and resubmitted to the Program with the correct capacity factor. See Section 7.11.3 of the 2026 Long-Term Plan for more information about this allowance.

system size. Switching among production estimate calculation methodologies between Part I and Part II is permitted only if accompanied by a decrease in the capacity factor. Subject to all of the above, the lower of (i) the product of the Part I capacity factor and the Part I project size; and (ii) the product of the Part II capacity factor and the Part II project size will be used to establish the number of RECs for contractual payment and delivery obligation.

Modifications to Part I project parameters may be permitted before the Program Administrator approves the Part II application, but only if these modifications do not increase the 15-year REC quantity.

All projects must submit a PDF output of the system design, including the shading study.

## 10.13. System Size

All system sizes described in this Manual are AC system sizes based on the aggregate inverter size (e.g., a system with a single 10 kW inverter is considered a 10 kW system even if it has 12 kW of STC DC capacity).

- Inverter capacity shall be measured as the nameplate maximum continuous output.
- An inverter shall be connected to a solar panel in order to be considered part of the AC system size. In the case of microinverters that contain two inverters per unit, only the inverters connected to a panel shall be included in the AC system size.

Systems that do not include a battery/storage component will be limited to a DC capacity of 155% of the AC capacity (for example, a 10 kW AC system can contain a maximum of 15 kW in STC DC capacity). Beginning with the 20224-2025 Program Year, all systems that include a battery/storage component will be limited to a DC capacity of 200% of the AC capacity.

An Approved Vendor may request an exemption for this requirement, but exemptions will only be granted for good cause and at the discretion of the Agency and its Program Administrator.

## 10.14. Systems with Battery Backup

All systems that include a battery shall be electrically connected in a manner that ensures that any non-solar-generated electricity used to charge the battery is not later metered as solar-generated power. This can be done in one of three ways:

- The meter used to report production is electrically located before the battery charger and does not measure any power that is drawn from the battery bank.
- A net meter is connected to the system that runs in reverse when any non-solar power, including onsite generator power, is used to charge the battery bank.
- The inverters' software setting is configured to prevent the battery<sup>83</sup> from charging via line power. This software setting may not be changed for the duration of the project's participation in ILSFA.

It is recommended that Energy Storage Systems be installed per the requirements set forth in NFPA 855: Standard for the Installation of Stationary Energy Storage Systems to ensure public safety and first responder safety.

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<sup>83</sup> For systems that include a battery, a detailed schematic must be provided showing that either only solar-generated power can be used to charge the battery; that the battery's output does not run through the meter used to measure solar output; or that a password-protected software setting is enabled for the duration of the project's participation in ILSFA that prevents the battery from charging via line power.

## 10.15. Systems that Directly Serve DC Loads

The IPA does not wish to inadvertently prohibit participation in the Program by PV systems that do not convert the DC electricity produced to AC electricity. However, for the reasons addressed below, the IPA is still in the process of developing standards for allowing Program participation from DC-only systems.

Certain difficult questions arise in considering how to structure such systems' participation, particularly, how to estimate the system's 15-year REC production for purposes of establishing a contractual delivery obligation. The 2026 Long-Term Plan allows systems to use an alternative capacity factor based on an analysis using PVWatts or an equivalent tool. This may be challenging, however, given that the alternative capacity factor ordinarily must be multiplied by a system's nameplate capacity (measured based on the aggregate inverter size in kilowatts AC), and in a DC-only system, the capacity of solar panels may significantly exceed the inverter size. An alternative approach may be to assume an inverter equal in size to the DC PV array (e.g., if such a system has 10 KW DC of panels, the IPA could assume an inverter size of 10 KW AC and then multiply by a standard capacity factor).

After approval of the initial Long-Term Renewable Resources Procurement Plan in August 2018, the Agency communicated regularly and deliberately with industry stakeholders who were seeking to coordinate and obtain ANSI approval of a new DC metering standard. However, the Agency has not received any subsequent input from such stakeholders and understands that this standard was finalized in March 2021. The Agency has not reviewed the applicability or relevance of this standard to its programs, nor has it received any expressions of interest in systems metered in this manner. Should the Agency become aware of interest in DC-based metering projects, it will initiate a stakeholder feedback process to establish appropriate DC metering standards.

## 10.16. Metering

The following metering requirements are identical for systems registered with either GATS or CleanCounts (formerly M-RETS):

- Systems 25 kW and above in size must utilize a new production meter that meets ANSI C.12 standards. Inverters with integrated ANSI C.12 compliant production meters are allowed with a specification sheet showing this standard has been met. The inverter must be UL-certified and must include either a digital or web-based output display.
- Systems over 10 kW and less than 25 kW in size must utilize a production meter that meets ANSI C.12 standards. Production meters that are refurbished (and certified by the meter supplier) are allowed. Inverters with integrated ANSI C.12 compliant production meters are allowed with a specification sheet showing this standard has been met. The inverter must be UL-certified and must include either a digital or web-based output display.
- Systems of 10 kW in size and below must utilize either a production meter that is accurate to +/- 5% (including refurbished and certified meters) or an inverter that the manufacturer specifies to be accurate to +/- 5%. The inverter must be UL-certified and must include either a digital or web-based output display.
- No system is required to have automated or remote meter reporting capability, although such production meters are allowed if they meet the requirements in points one to three above.
- As referenced above, the Agency has not yet adopted a DC metering standard and welcomes continued feedback on the proper approach.

**TABLE 10.1. METERING REQUIREMENTS**<sup>84</sup>

Registry	System Size	Accuracy	New versus Refurbished	Meter versus Inverter
CleanCounts (formerly M-RETS)  and  PJM-GATS	>=25kW	ANSI C.12 revenue grade	New only	Meter or inverter with integrated ANSI C.12 production meter (must be UL-certified with digital or web-based output display)
	>10kW and <25kW	ANSI C.12 revenue grade	Refurbished is acceptable	Meter or inverter with integrated ANSI C.12 production meter (must be UL-certified with digital or web-based output display)
	<=10kW	+/- 5%	Refurbished is acceptable	Inverter acceptable (must be UL-certified with digital or web-based output display)

## 10.17. No Partial Systems

All systems submitted to ILSFA must include the entire output of the system (recognizing, of course, that the REC delivery obligations for Community Solar projects correspond to only the subscribed shares of income-eligible households or the single anchor tenant for those projects). Any capacity of a system that is designed to sell RECs to another party and will not be part of ILSFA must be separately metered with a separate inverter.

# 11. Renewable Energy Credit Management

## 11.1. Contracting Process

### 11.1.1 REC CONTRACTING OVERVIEW

Once a project's Part I submission has been determined as complete and eligible, and the project has been selected according to the Project Selection Protocol, batched, and approved by the ICC, the ILSFA Program Administrator coordinates with the Illinois Shines Program Administrator to facilitate REC contracting. Project data will be shared between administrators to leverage the Illinois Shines program REC management systems and to provide a streamlined contracting process for Approved Vendors, utilities, and the Agency.

#### SOURCE OF FUNDS AND THE COUNTERPARTY

Program funding comes from two sources: 1) the state-held Renewable Energy Resources Fund (RERF); and 2) utility-held funds collected from the Renewable Portfolio Standard riders. Each approved batch will be wholly funded by one or the other source, with utility funding prioritized until an annual utility budget is exhausted. Projects funded by utility-held funds require contracting for REC purchases between an Illinois electric utility and the Approved Vendor. RERF-funded projects require contracting for REC purchases between the Agency and the

<sup>84</sup> Metering requirements are identical for systems registered with either GATS or M-RETS.

Approved Vendor. The Approved Vendor is not able to choose or request one contractual counterparty or the other at the time of application.

## **REQUIRED DOCUMENTS, CONTRACTS, AND AGREEMENTS**

The Renewable Energy Credit Agreement, or “REC contract,” is between the Approved Vendor and the utility counterparty or the Agency. The REC contract is executed once between counterparties and establishes the agreed framework for contracting and delivering RECs across multiple contracts and projects. There are currently four sets of contracts: one set used for projects approved in 2018-2019 to 2020-2021 Program Years, a second set for projects approved in the 2021-2022 Program Year, a third set for projects approved in Program Years 2022-2023 and 2023-2024, and a fourth set for projects approved in Program Years 2024-2025 and 2025-2026 (both utility and IPA). New contracts are being developed for the 2026-2027 Program Year, which will reflect necessary updates and changes in the 2026 Long-Term Plan. When available, the REC contract will be posted to the ILSFA website.

The REC contract is the agreement representing a batch or batches (each batch memorialized through a Product Order) of projects contracted for delivery between counterparties.

The Product Order is an agreement representing a single transaction or batch, which may include multiple projects within a single sub-program.

More detail on the REC requirements can be found in each of the [ILSFA Standard REC Contracts](#) (i.e., the standard contract between an Approved Vendor and the Agency and the standard contract between an Approved Vendor and an electric utility). Additionally, if an Approved Vendor is assigning their entire REC contract or any product orders/batches in their entirety to another Approved Vendor, the [Acknowledgement of Assignment](#) and [Acknowledgement of Assignment and Consent](#) must be signed by the Assignor, the Assignee, and the Buyer. More information about this can be found in the [Assignment FAQ](#).

## **ILLINOIS COMMERCE COMMISSION APPROVAL**

The ICC meets approximately every two weeks. Both Program Administrators strive to process approved batches for submittal to the ICC efficiently. The IPA and the Program Administrators understand that ICC practice is that items for consideration by the ICC must be submitted for its open meeting agenda at least eight business days prior to each meeting. An Approved Vendor’s first batch or batches with a given counterparty (either a utility or the Agency) will constitute a new REC contract. Subsequent batches will be included in separate Product Orders under the existing REC contract.

When the Program Administrator submits contract (or Product Order) information to the ICC for approval, that submittal will include the Agency’s and Program Administrator’s recommendation for approval of the batch, with a summary of factors relevant to the 2026 Long-Term Plan compliance and pertinent to the ICC’s standard of review for batch approval. Once the ICC approves a batch, the applicable utility or the Agency will execute the REC contract (or Product Order). The Approved Vendor must then sign the REC contract (or Product Order) as approved by the ICC within seven business days of receiving it.

## **FAILURE TO EXECUTE THE CONTRACT**

Approved Vendors that do not execute an ILSFA REC contract (or Product Order) after project selection, submission to the ICC for approval, the ICC’s approval, and contract execution by the Buyer (the applicable utility or the Agency) may face disciplinary measures. Any discipline will be based on the Program Administrator’s and IPA’s review of the circumstances under which the contract (or Product Order) was declined.

Discipline may include a possible suspension or termination of the Approved Vendor’s status under ILSFA. Suspension or termination will not impact an Approved Vendor’s rights or obligations under already-executed

contracts or product orders, but rather, it will impact the Approved Vendor's ability to submit new project applications. Generally, the Program Administrator and the IPA will review all of the circumstances informing why a contract award was declined before the issuance of any discipline. Approved Vendors should provide a detailed, comprehensive explanation for why they declined to execute any contract or product order. If circumstances genuinely outside of an Approved Vendor's control necessitated non-execution, then discipline may have a limited deterrent effect and may not be warranted. Neither the IPA nor the Program Administrator is able to provide a disciplinary determination in advance of non-execution to "pre-approve" such an action, nor can they provide a timeframe for the issuance of such a determination after non-execution.

## **COLLATERAL**

Following ICC approval of a batch, the Approved Vendor must post collateral for all systems in the batch within 30 business days. Initial collateral for any system is 5% of the total REC contractual value for that system, as follows:

- For Residential Solar (Small or Large) or Non-Profit and Public Facilities projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application, or if already energized, based on the final capacity factor and the system size as built (if smaller than the proposed size).
- For Community Solar projects, if not yet energized, this is based on the capacity factor and system size proposed in the Part I application, including a proposed REC price that solely uses the applicable ILSFA Community Solar REC price plus the highest small subscriber adder. If already energized, this is based on (i) the final capacity factor and system size as built (if smaller than the proposed size); (ii) the anchor and non-anchor tenants' shares; and (iii) the applicable anchor share REC price and ILSFA (non-anchor) REC price, including the applicable small subscriber adder.

Collateral may be posted in the form of cash or a Letter of Credit. A Letter of Credit must use standard forms provided with the published REC contract; minor modifications may be allowed if approved by the contract counterparty. SEB Approved Vendors have the option to withhold collateral at Part I approval for a maximum of five projects under Contract. The SEB Approved Vendor must inform the Program Administrator and Buyer within 10 business days of ICC approval of their intention to withhold collateral on an approved project. Once a project has been energized, the withheld collateral will be deducted from the project invoice.

## **CLAW BACKS AND DRAWDOWNS**

Should an Approved Vendor fail to fulfill requirements in their REC contract, ILSFA REC payments may be clawed back or a drawdown could occur of project collateral.

For Community Solar projects, to ensure ongoing subscription levels by income-eligible subscribers, the Approved Vendor shall provide ongoing collateral for 10 years equal to 5% of the remaining REC value and report annually on income-eligible subscription levels. If those levels are not maintained, then collateral may be called upon to claw back the incentives to the level of income-eligible subscription.

For Energy Sovereignty projects, the contract between the participant and the system owner should define how and when the ownership transfer will happen. The REC payments will still be paid upfront as ILSFA requires, but Approved Vendors may be required to repay some or all of the REC incentive value if the transfer does not occur within the timeframe specified in the project application.

For REC delivery, Approved Vendors will report on any systems that have not delivered a first REC and report on any systems that have not delivered RECs for more than a year from their previous delivery. In the event of failure to remedy the non-delivery of RECs or projects that are underperforming, the Buyer may draw on the collateral it holds from the Approved Vendor. More information on the mechanics surrounding collateral drawdowns for non-delivery of RECs or underperformance of ILSFA projects is outlined in the REC contract.

## 11.2. REC Delivery

All systems must be registered in either the PJM-GATS or CleanCounts (formerly M-RETS) tracking registry.

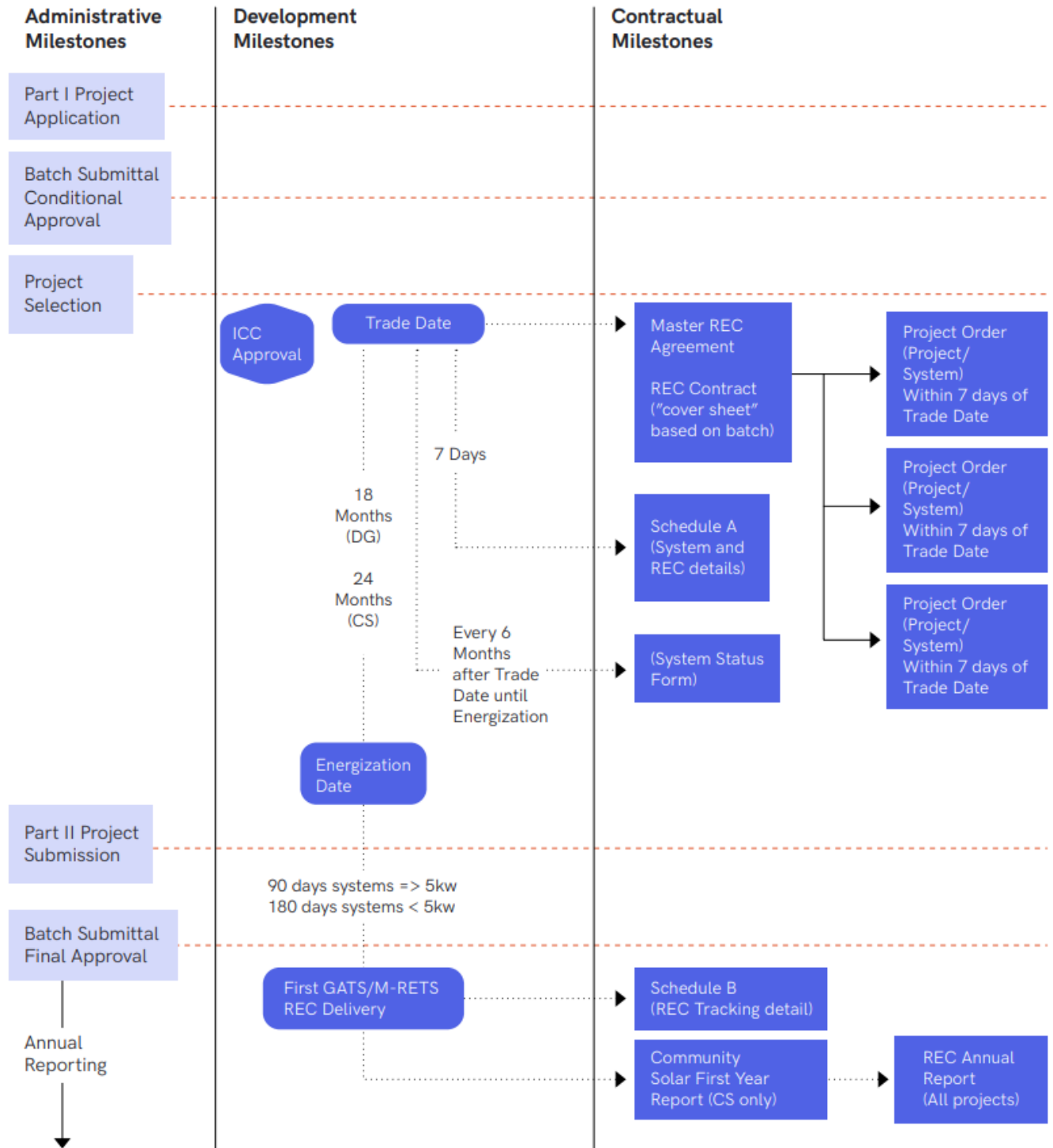
For systems larger than 5 kW, the first REC must be delivered within 90 days of the date the system is Energized and registered in GATS or CleanCounts (formerly M-RETS).

- For systems smaller than 5 kW, 180 days for the first REC delivery will be allowed.

The 15-year delivery term will begin in the month following the first REC delivery and will last 180 months.

Approved Vendors are required to set up an irrevocable 15-year Standing Order (or Recurring Transfer) for the transfer of RECs from the system to the utility or Agency. Standing Orders represent 100% of the capacity the system produces, except for Community Solar. For Community Solar projects, Approved Vendors should establish the standing order once their subscription levels have been confirmed with their Vendor Manager. The subscription levels should be entered as the certification percentage when the standing order is created. Standing orders must be established without an end date. The applicable buyer (utility or Agency) of the RECs will cancel the order at the end of the REC delivery term.

When registering a system in PJM-GATS or CleanCounts (formerly M-RETS), the Approved Vendor must incorporate the ILSFA application ID into the name of the system, the Unit field, and the Note field. Where the IPA is the counterparty for a project's REC contract and not ComEd or Ameren Illinois, Approved Vendors should use IPA's GATS account, "Illinois Solar for All – IPA," as the recipient for the irrevocable standing order. Do not establish the standing order for the "IPA Transitional Account." Approved Vendors using CleanCounts (formerly M-RETS) for REC delivery on projects where the IPA is the counterparty should establish the irrevocable standing order (or Recurring Transfer) with the account "IPA." When using GATS or CleanCounts (formerly M-RETS), Approved Vendors are allowed to edit pending standing orders (or Recurring Transfers) until entries are accepted by the counterparty.

**DIAGRAM 11.1: ILLINOIS SOLAR FOR ALL REC CONTRACTING PROCESS**


The diagram above presents an overview of the REC contracting process from Part I project submission through Energization and entering projects into the applicable tracking registry.

## 11.3. Community Solar REC Value Calculation

- Community Solar projects that are not 100% subscribed at the time of Energization will set up a standing order for the percentage subscription the project has met at the time of Part II submission and confirmed with a Vendor Manager. The standing order will be amended based on subscription levels of Qualifying/Non-qualifying subscribers at the end of the first year after Energization.
- There are three subscriber-share types for Community Solar projects:
  - Anchor tenants:
    - A single anchor tenant that is a non-profit organization or public entity
    - A single anchor tenant that is not a non-profit organization or public entity
    - A single anchor tenant that is an income-eligible master-metered residential building
  - Qualified income-eligible household subscribers:
    - Based on their subscription contract, income-eligible household subscribers may also be determined to be Energy Sovereignty subscribers.
  - Non-qualified subscribers (all other subscribers)
- Projects categorized as Energy Sovereignty projects for the purpose of the Project Selection protocol must maintain ownership shares for at least 50% of the energy generated by the project for at least 27 of the 36 months after the date of Energization.
- A single anchor tenant that is not an income-eligible household (as defined below) will be allowed. The anchor tenant's share will receive the applicable Illinois Shines Community Driven Community Solar REC price, except for an income-eligible master-metered residential building anchor tenant, in which case RECs produced from the property's share of the project will be paid based on an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price. The anchor tenant must be identified at the time of the Part I application. Note that in the first two Program Years, non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar price.
- Other than the anchor tenant, all subscribers must be income-eligible households (defined as residential households that verify as 80% or less of AMI) for the project to receive REC payments for those subscription shares. At least 50% of the total energy produced, excluding the anchor tenant's share, must be allocated to income-eligible subscribers by one year after the time of Energization (e.g., if the anchor tenant's share is 30% of the project capacity, then at least 35% of the total energy produced must be subscribed by qualified income-eligible households).
- Subject to the requirements above, any retail electricity participant in that utility's territory can subscribe to the remaining shares.
- All subscribers to a Community Solar project (including non-anchor and non-income-eligible residential subscribers) must receive and execute an Illinois Solar for All Community Solar Standard Disclosure Form.
- The Program Administrator will additionally verify subscription levels at Energization based on a review of the net-metering list for all subscribers provided by the Approved Vendor from the utility net metering portal.
- Approved Vendors shall update the percentage of the respective recipient types for the Community Solar project at the end of the first year to establish the final contractual value.
- Approved Vendors shall subsequently submit Annual Reports once per year based on their achieved subscription rates for the previous year, with collateral drawdowns in some cases for failure to reach the contracted subscription percentages in a given delivery year. See Section 12 (Annual Reporting) of this Manual for more details.
- Projects within the Community Solar sub-program can qualify for the Energy Sovereignty selection prioritization points either through an ownership or cooperative model for subscribers, as described in section 4.3.

## 11.4. Systems Already Energized at the Time of Contract Signing

Systems already energized at the time of REC contract signing, including systems energized on or after June 1, 2017, will be required to deliver their first REC within 90 days of contract signing, or 180 days for systems less than 5 KW. The 15-year delivery term will begin in the month following the first REC delivery and will last 180 months. Any RECs created before contract signing are not part of the contract and will not be transferred to the utility or Agency under the contract or purchased by the counterparty under the contract.

## 11.5. Submitting REC Information to Tracking Systems

Approved Vendors are responsible for entering system production data in the tracking registry where the system is registered. This must be done at least annually (and as frequently as monthly) and as necessary to ensure that the delivery of required RECs under contract is complete before the Annual Report submission date. RECs with completed transfers past the Annual Report submission date will be counted in the following reporting year. Detailed information about creating RECs in the PJM-GATS system can be found at [www.pjm-eis.com](http://www.pjm-eis.com). Detailed information for CleanCounts (formerly M-RETS)<sup>85</sup> can be found at [help.mrets.org](http://help.mrets.org).

## 11.6. Assignment of REC Contracts

REC contracts entered into under the ILSFA program are assignable, and assignments may be made at either the batch (or “Product Order,” as used in the contract) or Master Agreement level. As required by the 2026 Long-Term Plan, assignments may only be made to entities registered with the ILSFA program as Approved Vendors. If the assignment is to an Approved Vendor with a valid REC contract with the same counterparty through the ILSFA program, then the prior written consent of the counterparty utility is not required for that assignment, and any batches transferred will constitute new batches under the assignee Approved Vendor’s existing agreement with that counterparty. The Approved Vendor assignor must notify the IPA and/or utility counterparty of such an assignment made without the counterparty’s consent and provide that counterparty with the assignee’s contact and payment information.

Assignments of a product order may not be made within the later of a) 30 business days after the ICC approval date of the product order; or (b) the posting date of collateral for the product order. In the case of the assignment of an individual batch, any surplus RECs associated with the batch remain with the original master agreement. On assignment, an Approved Vendor’s ongoing collateral with respect to a transferred batch, if in cash form, may be applied to the transferred batch, while letters of credit will remain in place until the assignee posts replacement collateral. The Agency reserves the right to publish a standard acknowledgment form for assignments of the REC contract. Upon completion of the assignment, new contract documentation—including Exhibit A and associated schedules—will be developed by the Program Administrator to reflect the change in systems subject to the assignor’s original agreement and the assignee’s expanded or new agreement.

[View a detailed set of steps](#) for initiating the assignment of a product order(s) or a whole REC contract.

## 11.7. Collateral Assignment

Collateral assignment of the REC contract by an Approved Vendor (i.e., pledging of the accounts, revenues, or proceeds in connection with any financing or other financial arrangements for a system or systems, but without

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<sup>85</sup> M-Rets has changed its name to CleanCounts, but the platform for tracking RECs is still called M-RETS.

relieving itself of performance obligations) is permitted at either the batch or Master Agreement level and does not require prior consent of the counterparty. The Approved Vendor must notify the IPA and counterparty utility (if applicable) of the collateral assignment made without the counterparty's consent and provide the counterparty with the identity of and contact information for the financing party.

As financing parties are unlikely to be Approved Vendors but may become assignees of a batch (Product Order) or an entire REC contract due to foreclosure or default under financing arrangements, the requirement that such an assignee be an Approved Vendor will be waived for 180 days following such a transfer. The new assignee would then have 180 days to either a) become an Approved Vendor itself, or b) assign the batch or Agreement to an Approved Vendor.

For more information on assignment or collateral assignment, please see the relevant section on Assignments within the applicable REC contract.

## 11.8. Relief for Abandoned Contracts

The 2026 REC Delivery Contract will provide relief for instances where a customer has “abandoned” their contract with an Approved Vendor, primarily by providing a mechanism for the removal of affected qualifying projects from the REC contract. This project removal mechanism allows Approved Vendors to obtain 25% refund of the collateral amount held by the contracting utility that is associated with the abandoned project. An abandoned contract may be the result of a property transfer, foreclosure of a property, or a business closure. The Agency defines “abandoned contract” as a contract obligation for a system which meets the following criteria:

1. Is no longer delivering RECs;
2. Is sited on real property that has undergone a change in ownership; and
3. The Approved Vendor has exercised reasonable effort to restore the system's delivery of RECs.

Approved Vendors will be required to submit a written request to designate a system as an Abandoned Contract, and the Agency will have the discretion to accept or reject such request. The written request must include a description and/or proof of the “reasonable effort” taken by the Approved Vendor to contact its customer, which should include multiple methods of communication (phone calls, emails, and mailed letters) over one calendar year. Efforts to contact a customer shall be made at least once every two months, with at least six attempts in a calendar year using alternating methods, unless the customer responds prior to the sixth attempt confirming the Contract has been abandoned.

This project removal mechanism is only available to distributed generation projects under the 2026 REC Delivery Contract and is not retroactive to past versions of the Contract.

## 11.9. Relief for Interconnection Denials

Previous versions of the Master REC Delivery Contract have provided avenues for relief when a developer receives a high interconnection cost estimate from the interconnecting utility or significant delays related to interconnection that were not primarily caused by the developer-seller's actions. However, previously, the Program did not provide clear guidance about whether relief was available for projects which receive an interconnection denial.

The 2026 REC Delivery Contract will contain contractual provisions to clarify that, if a project receives an interconnection denial, the Seller may remove the project from the contract and receive a refund of any extension fees that have been paid plus a portion of its Performance Assurance in the amount of the Collateral Requirement associated with such Designated System. This is intended to reflect that an interconnection denial functions just as an interconnection delay, and therefore will be treated the same by the Program. Approved Vendors are expected

to demonstrate that this denial was not within the Seller's control, just as Approved Vendors are expected to demonstrate that a delay was not primarily caused by Seller's actions.

Further, should an Approved Vendor receive an interconnection denial for a project on an earlier version of the REC Delivery Contract, the Agency clarifies that the provisions related to an interconnection delay may also be utilized for such a denial.

## 12. Annual Reports and System Performance Evaluation

### 12.1. REC Delivery Performance Annual Report

At the time of Energization, a schedule of annual REC deliveries over 15 years will be set based on the system's approved capacity factor and a 0.5% annual reduction of delivery obligations.<sup>86</sup> On an annual basis, each Approved Vendor will work with the Program Administrator to submit an Annual Report of the contracts and systems in its portfolio. Approved Vendors should ensure that generation data is entered, and RECs have been delivered to the Buyer accounts within the applicable tracking registry (PJM-GATS or CleanCounts (formerly M-RETS)) prior to the end of the reported Delivery Year (i.e., May 31).

The Annual Report will serve as the basis for verifying that the RECs from projects are being delivered to the applicable counterparty. Absent corrective actions taken by the Approved Vendor, the Annual Report serves as a tool to determine what actions may be taken by the utilities or Agency to enforce the contractual requirements that RECs are delivered, including, but not limited to, drawing on collateral. Additionally, the Annual Report will be used by the Agency and Program Administrator to consider the ongoing eligibility of an Approved Vendor to continue participation in the Program. For all systems, the Annual Report will include information on:

- RECs delivered by each of the systems in the portfolio
- Status of all systems that have been approved but not yet Energized, including any extensions requested and granted
- Energized systems that have not delivered RECs in the year
- Status of annual job training hours and requirements
- Balance of collateral held by each utility
- A summary of requests for REC obligation suspensions, reductions, or eliminations due to force majeure events
- Information on consumer complaints received
- Status of identified inspection and/or installation deficiencies

Each Approved Vendor will be able to change its point of contact for completing the Annual Report at any time if desired.

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<sup>86</sup> An Approved Vendor may request for a system's annual REC delivery obligations to be reduced in mid-contract. The Buyer and Seller would then seek to negotiate a settlement payment as part of the reduction in delivery obligations; the Buyer would not be required to ultimately accept the request.

## 12.2. Reporting for Community Solar Projects

### 12.2.1 ANNUAL REPORTING FOR COMMUNITY SOLAR PROJECTS

The following items must be included in the Community Solar Annual Report:

- Percentage of each system subscribed on a capacity basis
- The number and type of subscribers (e.g., income-eligible households, anchor type, non-qualifying subscribers, Energy Sovereignty subscribers), including capacity allocated to each type
- Subscriber turnover rates

The Community Solar Annual Report will require the Approved Vendor to enter each verified subscriber with a signed Disclosure Form, subscriber type, the subscriber's contract start date, and end date (if it fell within the current reporting year), whether the subscriber meets the small subscriber requirements, and the subscriber's subscription size in kW, if applicable based on whether small subscriber adders were available when the project was contracted. The portal will automatically prorate all data to determine the average subscription amount and percentage of small subscribers based on this data. Subscriber details and disclosures should be submitted to the portal no later than 30 days prior to the end of the delivery year. This is to provide time for review and for any corrections that need to be made prior to the end of the delivery year. Small subscriber share (as applicable) is determined by the aggregate share of income-eligible household subscribers only. A signed Disclosure Form is required for a given subscriber to count toward a Community Solar project's subscriber tally in the Annual Report. As with project cost data, the IPA will treat this information as confidential and proprietary and will protect this information as required under Section 1-120 of the IPA Act (including asserting any applicable protections in response to FOIA, discovery, or other requests).

Approved Vendors will be given 90 days to cure any deficiencies in the information reported, as found by the Agency and/or utilities. Failure to cure deficiencies may result in the contracting utility and/or the Agency drawing on collateral. In addition, Approved Vendors' Program eligibility may be jeopardized by failure to address and cure deficiencies.

The Agency will review the Annual Reports as well as utility-reported information on REC deliveries and Community Solar subscribers to assess compliance with the requirements of the ILSFA program and, if there are underperformances, coordinate with the applicable utility to draw on collateral. That process is described below.

### 12.2.2 ESTABLISHING AND REPORTING SUBSCRIBER SHARES

The Community Solar project shares, as submitted at the time of Part II submission, will establish the basis for the project's approval in Part II of the project application. In Part I of the application, the anchor tenant must be confirmed, including their share in kW and whether they qualify as a non-profit organization or a public entity. If the project applicant would like to change the anchor tenant after Part I approval, then a written appeal following the process in Section 1.4 must be submitted. In addition, by one year after Energization, the share of qualified income-eligible households must be at least 50% of the non-anchor share. The collective share of anchor tenant and income-eligible household subscribers, as indicated in the Part I application, will be the basis for the REC contract approved by the ICC. The collective share of the anchor tenant and income-eligible subscribers established upon Energization and further adjusted one year later will be the benchmark for annual reporting and potential collateral drawdowns under the REC contract. Subscriber types will each receive different consideration for REC payments, with:

- The anchor tenant receiving the applicable Illinois Shines program REC value; noting that in the first two Program Years, non-profit and public sector anchors could receive the ILSFA Community Solar REC value

- The anchor tenant that is an income-eligible master-metered residential building receiving a REC value based on an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price
- Qualified income-eligible households receiving the applicable ILSFA REC value and all other subscribers not included in the REC contract and not receiving the REC value
- The percentage of small subscribers, if applicable, based on the year in which the REC contract was signed (correlates only to income-eligible household shares as a share of the total physical project size)
- The percentage of Energy Sovereignty subscribers

During the first annual reporting period, shares are reported by the Approved Vendor for each subscriber type, providing an opportunity to increase the total aggregate share in kW for the REC contract if subscription to the full project size was not achieved at Energization. Further, the subscriber mix and the value of RECs for those subscribers at the time of the first Annual Report will establish the ongoing contract requirements for this system. At the time of the first Annual Report, coinciding with the last day of the last quarterly period reported, the REC contract will be adjusted based on the following:

- The quantity of RECs shall be based on the percent of Actual Nameplate Capacity that has been subscribed by the anchor tenant and qualified income-eligible participants (known in the REC contract as End Use Customers).
- The Non-Anchor Tenant Contract Price shall be adjusted based on the Community Solar Subscription Mix (e.g., if the share of qualified income-eligible subscribers increases to a level that qualifies for a higher small subscriber price adder, then all income-eligible subscriber shares now can sell their RECs at the ILSFA price plus the applicable small subscriber adder). Applicable only for projects approved in Program Years when there was a small subscriber price adder.
- The Anchor Tenant Contract Price shall remain unchanged.
- All shares and REC prices at this milestone will serve as the benchmark for all future reporting, and any deviations from this benchmark will be the basis for potential draw-down/claw-back on collateral.
- If less than 50% of a project's non-anchor capacity is subscribed to by income-eligible residential participants at the end of the first contractual delivery year, the project shall have three additional months to cure the deficiency in order to avoid removal from the REC contract.
- All Energy Sovereignty subscribers to a Community Solar project, indicating ownership shares in a Community Solar cooperative or ownership of individual panels located in a Community Solar project.

See the relevant [ILSFA REC contract](#) for more details on guidelines for establishing and maintaining subscriber shares and REC contract compliance.

### 12.2.3 ONGOING REPORTING

After each delivery year, the Approved Vendor will be required to report subscriber information for each Community Solar project, including subscription amounts shared by each of the subscriber types, small subscriber status (applicable only for projects approved in Program Years when there was a small subscriber price adder), and subscription start/end dates. The IPA will evaluate the system's share of physical capacity that is subscribed to by each subscriber type, as well as by small subscribers (correlating only to the income-eligible household share).

Requirements contained in the REC contract will allow for a safe harbor of 90% total subscription levels as a percent of physical project capacity (counting the anchor tenant share and income-eligible residential subscriber shares) in order to avoid a collateral draw for a subscription shortfall in any delivery year following the first delivery year.

There will be a cure period after any Annual Report (starting with the report following the second contractual delivery year) if an anchor tenant was lost during the delivery year to bring subscriber shares back in line with

contract requirements (namely, income-eligible residential subscribers equaling at least 50% of non-anchor project capacity).

Projects will be allowed to deviate in a delivery year (starting with the second contractual delivery year) by three percentage points from the total contracted subscription shares of the tenant and income-eligible residential subscribers and avoid a collateral draw for that delivery year *only if* the project meets its contracted subscriber shares for the *following* delivery year. If the project falls short in the following delivery year, then a collateral draw would be made for each of those two delivery years.

## 12.3. Collateral and Performance Evaluation

Five percent collateral (as a percent of REC contract value) must be posted for a system within 30 business days of ICC approval. Approved Vendors who satisfy the definition and are registered as a small and emerging business may deduct the 5% collateral requirement from the REC payment rather than having it due after contract execution, with a five-project cap per Approved Vendor. Collateral and performance evaluation will generally be handled at a portfolio level (i.e., pooled across all project batches and systems for a given Approved Vendor). Underperformance by any system in either REC deliveries or Community Solar subscriptions can trigger a collateral drawdown for a delivery year based on the difference between the allocated REC payment paid for that delivery year and the allocated payment amount that the system was entitled to for that delivery year. In any delivery year where one or more systems under the REC contract have a collateral drawdown, the Approved Vendor may elect to pay the total drawdown as cash or have the drawdown taken from posted collateral. If two forms of collateral have been posted (cash and letter(s) of credit), the Approved Vendor may choose which form of collateral shall be drawn upon.

Within 90 days of any collateral draw, the Approved Vendor will be required to post additional collateral to top up its total collateral so that it equals five percent of its total remaining contract value (where each system's contractual value declines by 1/15 each contract year). This top-up situation is the only opportunity to reduce posted collateral for a project before the project's REC contract expires, with the exception of a Community Solar project, for which collateral will be fully released following the tenth delivery year of the REC contract. The Approved Vendor can request the withholding of the next payment(s) due under the contract (if any) in lieu of topping up the collateral. When the last system within a batch reaches the end of its delivery term, an Approved Vendor may request a refund of the collateral associated with that batch.

Any failure to post collateral or pay for collateral drawdowns on a timely basis as required shall be an event of default under the REC contract.

If a system receives an interconnection cost estimate from the interconnecting utility prior to Energization that exceeds 30 cents per watt AC (\$300 per kW AC), then within 14 days of having received that estimate, the Approved Vendor shall have the option of withdrawing that system from the REC contract and receiving a refund of 75% of its previously posted collateral associated with that system.

## 12.4. Underperformance and Surplus RECs

Starting at the end of the third full delivery year after the date of Energization, a three-year rolling average of actual REC deliveries will be calculated each year, and that average performance will be deemed to be the system's performance for the recently completed delivery year.

In the case of a system's annual surplus production, the surplus RECs will be applied to the Approved Vendor's surplus REC account,<sup>87</sup> which is a single surplus REC account for all projects under the REC contract. Surplus RECs can be banked forward indefinitely, if unused, until the end of the final delivery term in the REC contract.<sup>88</sup>

In the case of a system's annual REC underperformance, first, surplus RECs from the surplus REC account, if available, shall be used to address the deficit (starting for a delivery year, with the lowest-valued underperforming system and then moving to higher-valued systems within the contract portfolio). If surplus RECs are not available to fill in the entire underperformance across all systems in the contract for a delivery year, the underperformances shall be valued at the respective REC prices, and that total shortfall amount shall be remedied through a collateral drawdown for the delivery year.

At the end of the 15-year delivery term for the last system under an Approved Vendor's REC contract, any unused balance of surplus RECs may be used to receive a refund for prior collateral drawdowns related to REC underperformance.<sup>89</sup> The lowest-valued underdelivered RECs will first be refunded to the Approved Vendor, moving then to higher-valued underdelivered RECs, until no surplus RECs remain in the surplus REC account. If any surplus RECs remain in the surplus REC account after all prior collateral drawdowns have been refunded, no additional refund will be made for those leftover surplus RECs.

## 13. Invoicing and Payments

### 13.1. Invoicing for Part II Approvals

An Approved Vendor may submit an invoice for payment to the IPA or counterparty utility only for systems that have been Energized and for which the Program Administrator has approved the Part II project application. For all ILSFA projects, the REC contract provides for a one-time payment for the full 15 years of REC deliveries unless otherwise specified in the REC contract.

Note: for Community Solar projects specifically, compensation for all RECs generated and delivered is generally as follows: in any given year of the 15-year contract, an unsubscribed share of a Community Solar project would not be eligible for compensation for the equivalent portion of that year's generated RECs. Additionally, RECs associated with the unsubscribed share as of one year after Energization would not be required to be delivered throughout the 15 years. Additionally, any subscribed share of a Community Solar project that has a non-income-eligible subscriber other than the project's anchor tenant would not receive payment or have a delivery obligation for the associated RECs.

The formula for calculating the total REC payment of an Energized system is as follows:

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<sup>87</sup> For clarity, surplus RECs and the Approved Vendor's surplus REC account are only a "virtual" concept used for purposes of performance evaluation and collateral issues. The actual RECs shall be delivered to the counterparty (the utility or Agency) when generated and then retired.

<sup>88</sup> Following an assignment of a batch to another contractual party where the original Approved Vendor retains other batches in its contract, the original Approved Vendor will retain any surplus RECs that had been generated by systems in the transferred batch prior to the assignment.

<sup>89</sup> This refund procedure would not apply to prior collateral drawdowns based on annual Community Solar subscription rates.

System (inverter) size in MW AC x approved capacity factor x 365 days/year x 24 hours/day x 15 years x 1 REC/MWh x \$/REC

However, if the nameplate capacity of the system varies at Part II submission but is within the larger of 5 kW or 25% (e.g., system sizes that are larger or smaller than the Part I approved project application), the following exceptions occur:

#### **RESIDENTIAL SOLAR (SMALL AND LARGE) SYSTEMS**

- Where the nameplate capacity submitted in Part II is larger than Part I but within the larger of +5 kW or 25%, the contract price for purposes of payment shall be the REC price applicable to the actual nameplate capacity at the time of Energization, and if such REC price is not available, then the last prevailing REC price applicable to the actual nameplate capacity will be used. The quantity of RECs used for purposes of payment shall be the lesser of the REC quantities calculated based on 1) the proposed nameplate capacity and capacity factor; and 2) the actual nameplate capacity and capacity factor.
- Where Part II systems are smaller in size than Part I but within the larger of -5 kW or 25%, the contract price for purposes of payment shall remain unchanged from the Part I price. The quantity of RECs used for purposes of payment shall be the lesser of the REC quantities calculated based on 1) the proposed nameplate capacity and capacity factor; and 2) the actual nameplate capacity and capacity factor.

#### **COMMUNITY SOLAR SYSTEMS**

Where the nameplate capacity submitted in Part II is larger than Part I but within the larger of +/- 5 kW or 25%, and such change in nameplate capacity results in a change from a smaller size category to a larger size category applicable to the determination of REC prices, the anchor tenant contract price for purposes of payment shall be the REC price applicable to the actual nameplate capacity under the Illinois Shines Community Driven Community Solar REC price table at the time of Energization, except for an income-eligible master-metered residential building acting as an anchor tenant, in which case the anchor tenant contract price shall be the REC price applicable to the actual nameplate capacity under an average of the ILSFA Community Solar REC price and the Illinois Shines Community Driven Community Solar REC price tables at the time of Energization. Note: this represents a change from the first two Program Years, when non-profit and public sector anchors could receive REC payments at the ILSFA Community Solar REC price. The non-anchor tenant contract price for purposes of payment shall be the ILSFA REC price applicable to the actual nameplate capacity (plus any small subscriber adders) at the time of Energization.

- Where Part II systems are smaller in size than Part I but within the larger of -5 kW or 25%, the anchor tenant contract price for purposes of payment shall remain unchanged from the Part I price. The non-anchor tenant base price for purposes of payment shall remain unchanged, while it will also include any small subscriber adders applicable at the time of Energization.
- The quantity of RECs used for purposes of the REC payment shall be based on the lesser of (i) the proposed nameplate capacity multiplied by the proposed capacity factor; and (ii) the actual nameplate capacity multiplied by the Part II capacity factor. The quantity of RECs will also be based on the percent of the actual nameplate capacity that is being subscribed by the anchor tenant and income-eligible subscribers combined at the time of Energization; the subscription shares will be re-evaluated, with the quantity of RECs to be paid for and obligated, and then fixed for the life of the contract, at the end of the fourth full quarter after Energization.

Invoices for payment may be submitted to the IPA or counterparty utility on a quarterly or monthly basis unless otherwise specified, as described in the REC contract for the project being invoiced. To facilitate invoicing and payment, the Program Administrator will follow the Invoice Schedule and prepare a netting statement for each Approved Vendor applicable to each of its REC contracts (up to three, as there are two potential counterparty utilities and the Agency), which includes payment-related information for projects that were verified as Energized

during the recently completed invoicing month or period.<sup>90</sup> The IPA, through its Program Administrator, expects to issue quarterly netting statements by the first of each month for projects in Program Year 2022-2023 and beyond.

After the receipt of a quarterly netting statement, an Approved Vendor may submit its invoice for payment to the applicable counterparty no later than the tenth day of the month immediately succeeding Energization unless otherwise specified in the REC contract.

The Program Administrator will work with the Approved Vendor to ensure that the target invoicing date is feasible and that projects are deemed eligible for invoicing in Part II. The Approved Vendor should coordinate with its Vendor Manager to ensure the Part II review process provides ample time to allow for project review and corrections as needed. The Program Administrator will adhere to the [Invoice Schedules](#). Schedules will be posted in the Approved Vendor Portal and will be updated annually.

Where a utility is the contractual counterparty, payments from the counterparty to the Approved Vendor will be made (for the Approved Vendor's first contractual payment under a contract) at the end of the month immediately following the month in which an invoice is submitted, or (for subsequent payments under a contract) at the end of the month in which an invoice is submitted, provided that the counterparty receives the invoice by the relevant due date.

Each invoice submitted to the counterparty must include the following:

- Most recent quarterly netting statement provided by the Program Administrator to the Approved Vendor;
- Invoice amount;
- Cumulative amount already received by the Approved Vendor under the REC contract;
- Maximum allowable payment, as indicated in the most recent quarterly netting statement; and
- The PJM-GATS or CleanCounts (formerly M-RETS) Unit ID of each system is included in the invoice.

## 14. Inspections

### 14.1. Quality Assurance Overview

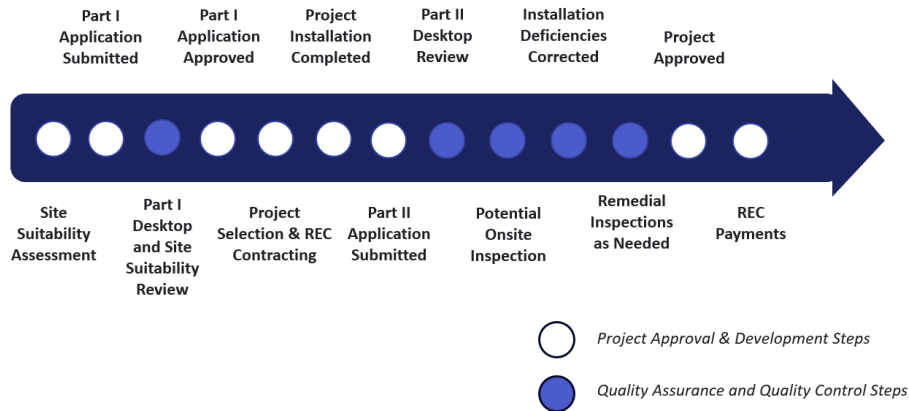
The ILSFA Program Administrator has developed and implemented a process for quality assurance of project systems,<sup>91</sup> including system design review, photo documentation, and onsite inspections of a subset of installations to ensure Program requirements are met. If installations have deficiencies, as noted in the Project Inspection Summary, the ILSFA Approved Vendor will be responsible for repairs, alterations, or additions to remedy deficiencies and cannot pass associated costs for this remediation onto participants. ILSFA Approved Vendors who persistently install deficient systems after remediation guidance may lose eligibility to participate in the ILSFA program.

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<sup>90</sup> A Community Solar project will also have a one-time payment adjustment at the end of the fourth full quarterly period after Energization.

<sup>91</sup> The Program Administrator will inspect installations, looking at electrical and structural aspects of the installation for program requirement and consumer protection review. Final approvals for system operation will be made by the Authority having jurisdiction and interconnecting utility.

The following diagram illustrates how the quality assurance milestones fit into the overall project development timeline:



The Program Administrator reviews photographs submitted with the Part I project application, along with the Site Suitability Report, to validate the site suitability findings and compliance with the Site Suitability Guidelines. Part II photo review validates the installed system, equipment, compliance with Program requirements, and general quality of workmanship. Onsite live inspections validate site suitability and provide an opportunity for detailed inspection of system quality, safety, and performance. Remedial processes associated with inspection findings are detailed below.

If sites do not meet the requirements presented in this document and the Site Suitability Guidelines at the time of Part I project application, the Approved Vendor must provide an appropriate mitigation plan as part of the Site Suitability Report. Submitted projects that do not meet these requirements and do not provide a completed mitigation plan will not be approved. If mitigation plans do not adequately demonstrate that all site suitability requirements will be met prior to installation, the Program Administrator will work with the Approved Vendor to develop a mitigation plan on a case-by-case basis. Where Approved Vendors dispute the findings of the Program Administrator either as part of a review of mitigation plans, photo documentation, or onsite inspection, they may submit a written appeal to the Program Administrator and the IPA as stated in Section 1.4.

## 14.2. Site Suitability

The Site Suitability Guidelines, linked below, identify site conditions that are considered barriers to the installation of both rooftop distributed generation and ground-mounted PV systems participating in the ILSFA program. These guidelines also prescribe minimum siting requirements that must be met at Part I project approval. Properties where roofing, electrical, structural, or other issues exist can create or exacerbate maintenance and repair issues, create unexpected costs, and impact system performance, potentially placing financial or legal burdens on property owners. These guidelines address common barriers to installing solar on existing structures in four categories: Roofing and Structural, Electrical, Space and Accessibility, and Health and Safety. Barriers in each of these categories may be common in income-eligible communities, where housing stock may be older and deferred maintenance issues more acute. Ground-mounted siting requirements represent industry best practices in most jurisdictions across Illinois and do not require engineering stamps prior to Part I approval.

The [Site Suitability Guidelines](#) document below describes these requirements in full and must be completed with each site assessment. Site assessments and Site Suitability Guidelines documents can be completed up to 18 months prior to Part I project submissions, or else a new site assessment will need to be completed.

As described in the Site Suitability Guidelines, mitigation plans are developed between the Approved Vendor and site owner to correct problems and remove the barriers to solar installation. The Program Administrator maintains a [Program Resources Guide](#) that catalogs a variety of resources aimed at supporting property owners with these mitigations or generally providing resources for incentives, grants, financing, and details of other programs, like energy efficiency and housing programs. Approved Vendors are required to share these resources when applicable and to support mitigation plans.

In addition to the Equitable Energy Upgrade Program, various other state, federal, and non-profit programs provide home repairs and upgrades for eligible households.

The U.S. Department of Housing and Urban Development (HUD) offers such programs and cites several other agencies and non-profits that provide a range of assistance, including HUD-approved housing counseling agencies, the Illinois Housing Development Authority, Illinois affiliates of Habitat for Humanity, U.S. Department of Veterans Affairs Regional Loan Centers, and the USDA Rural Development Office. The Program Administrator has compiled a list of these funding opportunities in an [External Funding List](#) and shares this document with ILSFA participants needing home repairs. This list is updated with new opportunities and any Program updates annually.

The Program Administrator has begun to work with these entities to explore the potential for coordination between solar installations and home repair programs and is seeking to integrate those opportunities into the ILSFA program. The Program Administrator has started various initiatives to begin this coordination, including the sharing of marketing materials with these entities to promote ILSFA, providing presentations to these entities on the ILSFA program, and exploring customer referrals and data sharing to and from home repair programs.

## 14.3. Photo Documentation

- Photographic documentation is required for all ILSFA projects (including document repair needs for projects under the Home Repairs and Upgrades Pilot) and will be reviewed as part of both Part I and Part II project submission and approval. The Part I photo review focuses on site suitability and demonstrates compliance with the requirements detailed in the Site Suitability Guidelines. The Part II photo review will focus on validating any proposed mitigation plans from the Approved Vendors to comply with site suitability guidelines, as well as system design compliance, quality of workmanship, and system performance. The assessment of photo documentation is Pass/Fail.
- All required photos must be submitted, clearly showing the requested site and installation aspects or components.
- Blurry or incomplete photos will need to be resubmitted.
- Any failure identified during the review of photo documentation may trigger an onsite live inspection. Certain failures may be resolved through additional or resubmission of photo documentation.

Please refer to the [Approved Vendor Photo Guide](#) for representative photo examples.

Photos should capture the appropriate views and equipment legibly and be clearly labeled to help expedite the review process. Part I and Part II project applications require photos as follows:

### 14.3.1 PHOTO DOCUMENTATION FOR PART I PROJECT APPLICATION

**SITE SUITABILITY**

**SHADING**

<p>Photos showing the overall roof condition:</p> <ul style="list-style-type: none"> <li>• Photos of the roof components</li> <li>• Photos showing the condition of the electrical panel</li> <li>• Photos showing work areas are clear of hazardous materials</li> <li>• Photos showing conditions of ground mount site (ground mount only)</li> </ul>	<ul style="list-style-type: none"> <li>• Photos showing the proposed array location</li> <li>• Photos showing potential obstructions</li> </ul>
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### 14.3.2 ELECTRICAL PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

<p><b>INVERTERS<sup>92</sup></b></p> <ul style="list-style-type: none"> <li>• Inverter Information (one photo for each model must show the model number; a single photo is acceptable if the system uses microinverters)</li> <li>• DC disconnect (either within the inverter or isolated)</li> </ul>	<p><b>OTHER ELECTRONICS<sup>93</sup></b></p> <ul style="list-style-type: none"> <li>• Project photo(s) showing all installed modules</li> <li>• Module information (one photo for each model, must show model number)</li> <li>• Revenue grade meter (one photo of revenue grade meter location and generation reading), with the serial number listed on the utility meter, must be visible</li> </ul>
<p><b>SAFETY LABELING</b></p> <ul style="list-style-type: none"> <li>• Photo(s) showing clear and accurate labeling as necessary on inverters, disconnects, conduits, the main service panel, and other electronics</li> </ul>	

<sup>92</sup> In the event of utilizing microinverters or modules with the microinverter pre-assembled, please capture the inverter photo during installation to avoid a potential revisit of this item during the Part II inspection.

<sup>93</sup> Please capture the photo of the modules' model number during installation to avoid a potential revisit of this item during the Part II inspection.

### 14.3.3 SHADING AND MITIGATED BARRIERS PHOTO DOCUMENTATION REQUIREMENTS FOR PART II PROJECT APPLICATION

SHADING	MITIGATED BARRIERS (IF APPLICABLE)
<ul style="list-style-type: none"> <li>• Array (one photo to show array design matches as-built conditions, including any possible obstructions)</li> </ul>	<ul style="list-style-type: none"> <li>• Photos as needed to show the completion of the mitigation plan</li> </ul>

## 14.4. Onsite Inspections

Once all required Part II documentation has been received, Approved Vendors can expect to receive communication within two weeks informing them of whether they 1) have successfully passed the desktop photo review; 2) need to resubmit materials; 3) have not successfully passed the desktop photo review; and/or 4) have been selected for an onsite inspection. Questions regarding the above process can be directed toward the Program Administrator’s Vendor Manager assigned to that Approved Vendor. The Approved Vendor will provide all status updates regarding both desktop photo reviews and onsite inspections to the property owner.

In addition to the mandatory desk review, a random selection of PV systems installed will be subject to an onsite inspection. The onsite inspections will be conducted by Program Administrator inspectors who the Program Administrator deems qualified and will look at the overall quality of the system installation. During the inspection, the inspector will verify all of the material that was already checked during the desk review and also look at the system in more detail. Once the onsite inspection is completed, a final score will be determined, and any material issues that may have been discovered during the inspection will have to be corrected by the contractor at the contractor’s expense before final system approval is granted. An Approved Vendor or contractor will have 20 business days from receipt of the Inspection Summary (with extensions for good cause) to remedy the issues. Remedies can include, but are not limited to, changes to the installation or updates to the REC contract to reflect deficiencies that impact system production.

Projects will be selected for live onsite inspections, which will be either virtual or in-person, according to the following schedule (which applies to each Approved Vendor or Designee):

- 100% of Community Solar installations will be inspected live onsite
- For all other project types:
  - 100% of an Approved Vendor’s first five installations will be inspected live onsite
  - 30% of an Approved Vendor’s next 10 installations will be inspected live onsite
- 20% of an Approved Vendor’s ongoing installations will be inspected live onsite until the Approved Vendor reaches 75 installations with the Program, at which point, 5% of ongoing installations will be inspected live onsite
- Remedial inspections will be conducted as needed and can impact this schedule

Additionally, at the discretion of the Program Administrator, 100% of projects utilizing Home Repairs and Upgrades funds will be inspected during the Part II submission.

Onsite inspections consist of several categories of investigation undertaken by inspectors and will vary based on the installation type, including:

- Community Solar or onsite systems
- Systems with site suitability concerns or repairs
- Systems with battery storage
- Rooftop or ground-mounted systems
- Angled or flat roofs
- Tracking or fixed systems
- Ballasted or penetrating anchor systems

Inspectors will perform visual inspections to verify information submitted during site suitability, application, and desktop review phases, including that installation and equipment follow designs/drawings submitted in the application, compliance with electrical codes applicable to each project, ensuring roof condition and structural supports are as described and provided in designs and any calculations, and verification of REC production metering.

The tables below describe these categories of investigation for onsite inspections, as well as specific areas that will be assessed:

Inverter Inspection	Electrical Inspection	Angled Roof Inspection
String Inverter	PV Array Configuration	Ballast Mount
DC Disconnect	Grounding	Rail Mount
DC/DC Converters	Wire Management	Rail-Less Mount
PV Source Circuit Combining	Conductors	Flat Roof Inspection
Load Side Connection	Over Current Protection Devices	Ballast Mount
Supply Side Connection	Electrical Connections	Rail Mount
Battery Storage	Signs and Labels	Rail-Less Mount
Rapid Shutdown Equipment	REC Production Metering	

Module Inspection	General Structural Inspection	Ground Mount Inspection
Microinverters and ACMS	Design Requirements	Ballast Mount
Load Side Interconnection	Components and Equipment	Tracking Mount
Supply Side Interconnection		
Battery Storage		

The [Onsite Inspection Checklist](#) is the form completed by the Program Administrator inspectors for each inspection.

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 Program Administrator inspector during the inspection. The Program Administrator inspector will then complete the onsite inspection in accordance with the requirements checklist. Selection of a project for an onsite inspection does not necessarily mean that a site has failed the desktop inspections. Rather, in accordance with the requirements of the Program, the first five projects completed by an Approved Vendor will require an onsite inspection, and a percentage of subsequent projects will then be randomly selected for onsite inspections. Although property owners have the right to refuse an onsite inspection, they will risk having their project's ILSFA REC contract and the associated funding canceled, according to the terms and conditions of the Program. The Approved Vendor will provide all status updates regarding both desktop inspections and onsite inspections to the property owner.

## 15. Workforce Requirements

### 15.1. Overview

#### 15.1.1 CRGA CHANGES

Illinois Solar for All requires that Approved Vendors meet workforce requirements across their portfolio of projects, and pay the applicable prevailing wage rate to workers employed on certain ILSFA projects. Public Act 104-0458, known as the Clean and Reliable Grid Affordability Act (CRGA), added language that amends workforce requirements for the Program by providing ILSFA Approved Vendors the option to either comply with the Minimum Equity Standard (MES) or the existing ILSFA job training requirements, starting in Program Year 2026-27.

At the start of each Program Year, Approved Vendors are required to identify which workforce requirement they will comply with, either job training or MES; any change to this designation may only be made at the beginning of a new Program Year when filling out the MES Combined Compliance and Year-End Report. All Approved Vendors should fill out and submit the first portion of the Combined MES Compliance and Year-End Report, which confirms their selected workforce track for the Program Year.

For Approved Vendors that elect to comply with the job training requirements, the rest of the MES Combined Compliance and Year-End Report does not need to be completed, and Approved Vendors will be directed to Salesforce to document job training requirements.

For Approved Vendors that elect to comply with the MES, the rest of the MES Combined Compliance and Year-End Report must be completed. Approved Vendors that select to comply with MES must meet all MES requirements detailed in section 15.3.

For information on the existing job training requirements, see section 15.2. For information on the new Minimum Equity Standard, see section 15.3.

## 15. 2 Job Training Requirement

### 15.2.1 OVERVIEW

To meet the job training requirements, Eligible Job Trainees will perform work on ILSFA projects at (1) a prescribed minimum percentage of total hours worked across an Approved Vendor’s projects annually; and (2) a prescribed number of ILSFA projects. Approved Vendors will track the work of these trainees, as well as all employees, subcontractors, Designees, and agents working on their ILSFA projects. Additionally, Approved Vendors must demonstrate compliance with the prevailing wage requirements for certain ILSFA projects by paying not less than the local, current prevailing wage rate for the applicable labor classification, notifying workers that the project is subject to prevailing wage, and submitting certified payroll transcripts in the manner specified below in Section 15.7 and the Prevailing Wage Act (820 ILCS 130/1, et seq.).

There are two categories of job training requirements for Approved Vendors for all ILSFA sub-programs: 1) portfolio requirements, and 2) percentage of annual projects requirements.

#### PORTFOLIO REQUIREMENTS

The portfolio requirements prescribe that projects across an Approved Vendor’s entire ILSFA portfolio on an annual basis include a minimum percentage of work hours performed by Eligible Job Trainees. The portfolio requirements apply to the projects managed by the Approved Vendor’s affiliates. This minimum percentage is based on work hours for all employees, subcontractors, and installers of the Approved Vendor, which the Program Administrator will collect. The required percentage of Eligible Job Trainee work hours increases annually for the first three years that the Approved Vendor participates in ILSFA, as shown in the table below, beginning from the construction of the Approved Vendor’s first project contracted under the Program.

To reduce barriers in meeting job training requirements and to encourage SEB participation in ILSFA, Approved Vendors designated as small and emerging businesses can include the job trainee hours worked on non-energized projects in the portfolio requirements (i.e., hours worked in projects that never reach Energization may be included to satisfy portfolio requirements), so long as the project has met, at least, Part I approval and the Approved Vendor has paid collateral. The Agency will maintain the same annual percentage requirements listed below for Approved Vendors designated as small and emerging businesses, but will allow them to count valuable hours worked on a project that may never be Energized. While Energization is required to receive ILSFA incentives, the hours worked on a project, regardless of Energization, are invaluable for an Eligible Job Trainee.

**TABLE 15.1. PORTFOLIO REQUIREMENTS**

Approved Vendor Program Year	Cumulative Job Training Requirement
1	10% of all hours are performed by Eligible Job Trainees
2	20% of all hours are performed by Eligible Job Trainees
3 and beyond	33% of all hours are performed by Eligible Job Trainees

#### PERCENTAGE OF ANNUAL PROJECTS REQUIREMENT

In addition to the portfolio requirements, at least 33% of the Approved Vendor’s projects annually in each ILSFA sub-program must include at least one Eligible Job Trainee. Approved Vendors will track the work of all Eligible Job Trainees, as well as the work of all employees working on ILSFA projects, including all subcontractors and installers

of the Approved Vendor.<sup>94</sup> No minimum hours per project or cumulative total hours are prescribed for this requirement; only that the requisite percentage of projects utilize at least one Eligible Job Trainee. However, Approved Vendors must also fulfill the portfolio requirements described above.

### **ILLINOIS COMMERCE COMMISSION REQUIREMENTS**

ILSFA Community Solar projects and Non-Profit and Public Facilities projects are exempted from the ICC requirement of using a Qualified Person for every portion of an installation, but the requirement does still apply for Residential Solar (Small and Large) projects.<sup>95</sup> This rule requires that every installation of a DG facility be performed only by a Qualified Person; an electrical contractor who is not a Qualified Person, provided a Qualified Person directly supervises them; or a person who is not a Qualified Person but is enrolled in a training program that, upon satisfactory completion, will meet the requirement to become a Qualified Person, provided a Qualified Person directly supervises them. The definitions of Qualified Person are further clarified in Section 15.2.1.

### **OTHER APPROVED VENDOR REQUIREMENTS**

In addition to the minimum hours and installation percentages described above, Approved Vendors are also responsible for adhering to the following requirements:

- The Approved Vendor and/or their subcontractors/installers/agents must pay Eligible Job Trainee(s) for time spent on each project at a rate consistent with the company's wage for employees in similar positions and at similar levels of experience, except in case of Eligible Job Trainees that are employed on a prevailing wage project to perform "construction," as defined in the Prevailing Wage Act (820 ILCS 130/2), for which such Eligible Job Trainees may be paid not less than the applicable prevailing wage rate for their labor classification and the project's location.
- The Approved Vendor and/or their subcontractor/installer/agent's insurance must cover the employment of the Eligible Job Training hires, including temporary hires.
- The Approved Vendor and/or their subcontractors/installers/agents must track the work hours of Eligible Job Trainees and any other employee performing work on each ILSFA project.

## **15.2.2 APPROVED VENDOR ANNUAL REQUIREMENTS CALENDAR**

The Approved Vendor must meet job training requirements starting on the date of the beginning of construction of the Approved Vendor's first project contracted under the Program. If project development occurs over multiple years, the work hours for that project will be included in the year the project began. This is especially important for large onsite projects and Community Solar projects, where development timelines can extend beyond a year. For example, if a project's start date was January 15, 2019 and coincided the same year of the beginning of construction of the Approved Vendor's first project contracted on the Program, and completed in September 2021, the hours will count toward the Approved Vendor's first year, and the Approved Vendor will be required to meet the 10% portfolio requirement, not 20%.

Starting in Program Year 2026-2027, the Program will begin to align annual portfolio reporting with the Program Year.

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<sup>94</sup> See Work Performance Tracking and the Role of the Job Trainee on ILSFA Projects within Section 15.2.1 for details on how to track the work.

<sup>95</sup> See [Section 16-128A of the Public Utilities Act](#) and [83 Ill. Adm. Code 468](#) for additional details on the ICC requirement of using a Qualified Person.

To account for variations in portfolio timelines and allow Approved Vendors a period of transition, all Approved Vendors currently meeting 10% or 20% portfolio requirements will remain at their current portfolio percentage for Program Year 2026-2027. At the start of Program Year 2027-2028, annual portfolio requirements will increase. Approved Vendors currently meeting 33% will also be shifted to a Program Year calendar at the start of Program Year 2026-2027. For new Approved Vendors, one full Program Year under the 10% portfolio requirement must pass before the Approved Vendor is required to meet year two percentage requirements.

For example, if the Approved Vendor's first project contracted in the Program has a construction date of October 15, 2026, the Approved Vendor will remain at the 10% portfolio requirements until the first full Program Year is complete. The 20% year two portfolio requirements would begin applying on June 1, 2028, and the year three 33% portfolio requirements would begin applying on June 1, 2029.

If an Approved Vendor's first project contracted under the Program begins construction up to three months after the start of a new Program Year, no period of transition applies. The Approved Vendor will be required to meet the 10% portfolio requirement until the end of the current Program Year and 20% at the beginning of the next Program Year.

For example, if the Approved Vendor's first project begins construction between June 1 and September 30, the Approved Vendor must meet the 10% portfolio requirement until the end of the current Program Year. The 20% year two portfolio requirement will begin applying on June 1 of the next Program Year.

All Single Project Approved Vendor projects must meet the job training requirement of 10% of all hours being performed by Eligible Job Trainees.

## 15.3 Defining Eligible Trainees and Qualified Job Training Programs

### 15.3.1 QUALIFIED JOB TRAINING PROGRAMS

Eligible Job trainees can come from two types of Qualified Job Training Programs: CEJA and FEJA Workforce Development Programs or Other Qualifying Programs ("OQPs"). CEJA and FEJA Workforce Development Programs include those programs described in Section 16-108.12 of the Public Utilities Act and approved in ICC Docket No. 17-0332, and OQPs include those programs described in 83 Ill. Adm. Code 468.20. Visit [Job Training](#) on the website for more details of current active Qualified Job Training Programs, along with other job training and workforce development resources.

Existing employees who complete a Qualified Job Training Program in an effort to meet the job training requirements are not considered Eligible Job Trainees. Approved Vendors will be required to sign an attestation in the Approved Vendor Portal that staff were not hired prior to becoming an Eligible Job Trainee.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the Eligible Job Trainee on an individual basis. Please review the [Project Waiver Evaluation Rubric for guidance](#).

#### CEJA AND FEJA WORKFORCE DEVELOPMENT PROGRAMS

These include the following categories of programs funded by the Act, including:

- **The Solar Training Pipeline Program:** This program provides installer training in underserved communities, solar installer training for returning citizens, foster care alumni, and veterans, and the Solar Contractor Accelerator for women-/minority-/veteran-owned businesses.

- **The Craft Apprenticeship Program:** This program provides apprenticeship training at 18 sites across the state, solar training at six community colleges across the state, and high school solar pre-apprenticeship programs at high schools in underserved Illinois communities.
- **The Multi-Cultural Jobs Programs:** These are workforce development programs integrated into initiatives around economic development, economic independence, youth leadership, OSHA and environmental certification for construction trades, and various utility industry trade skills.
- **The Illinois Climate Works Pre-Apprenticeship Program:** This program creates a network of Climate Works Pre-Apprenticeship Centers throughout the state that recruit, prescreen, and provide pre-apprenticeship skills training. Upon completion, participants will be connected to and prepared to complete apprenticeship programs in the construction and building trades.
- **Clean Jobs Workforce Network Programs (CEJA Workforce Hubs):** There are 13 Workforce Hubs across Illinois that offer training, certification preparation, and skill development for entry-level jobs in clean energy-related industries such as solar, wind, energy efficiency, and EV maintenance. The 13 hub areas are Chicago (South Side), Chicago (Southwest and West Sides), Waukegan, Rockford, Aurora, Joliet, Peoria, Champaign, Danville, Decatur, Carbondale, East St. Louis, and Alton.
- **Returning Residents Clean Jobs Program:** This program helps currently incarcerated individuals build new futures through clean energy careers. Training combines technical instruction and essential job skills to support successful reentry and long-term employment. Hands-on training and workforce-readiness education are provided to individuals in the custody of the Illinois Department of Corrections (IDOC).
- DCEO will be launching the following programs created by CEJA and will be listed on the [Job Training](#) page of the ILSFA website:
  - Clean Energy Contractor Incubator Program
  - Clean Energy Primes Contractor Accelerator Program

## OTHER QUALIFYING PROGRAMS

ILSFA Approved Vendors may also hire Eligible Job Trainees from an Other Qualifying Program (OQP) so long as they can demonstrate that completion of the job training program would lead to the eligible trainee becoming a Qualified Person under the Ill. Adm. Code 468.20 related to the certification of installers of photovoltaic systems.

Ill. Adm. Code Part 468.20 provides that Qualified Person status may be conferred upon individuals who have successfully completed at least one of the following programs requiring lab or field work:

- An apprenticeship as a journeyman electrician from a DOL-registered electrical apprenticeship and training program
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program
- An Underwriters Laboratories (UL) distributed generation technology certification program
- An Electronics Technicians Association (ETA) distributed generation technology certification program
- An associate degree in applied science from an Illinois Community College Board-approved community college program in the appropriate distributed generation technology

To become an Eligible Job Trainee for an ILSFA project from an OQP, an Eligible Job Trainee will have completed 50% or more of the course requirements for one of the training categories listed above. The application to become an OQP will request information such as a detailed curriculum and official program accreditation documents.

Alternatively, a student can complete 100% of an OQP's course requirements and successfully obtain an NABCEP PV Associate Credential to become an Eligible Job Trainee for an ILSFA project.

## ELIGIBLE JOB TRAINEE

To become an Eligible Job Trainee, individuals will have 1) completed a qualified CEJA or FEJA Workforce Development Program in one of the categories listed in the above “CEJA and FEJA Workforce Development Programs” section; 2) completed at least 50% or more of the course requirements of an OQP if it leads to a Qualified Person status; or 3) completed 100% of an OQP’s course and obtain the NABCEP PV Associate Credential. Eligible Job Trainees’ hours are eligible to meet the job training requirements for up to five years after meeting the criteria to be an Eligible Job Trainee, regardless of the job training program they completed.

The Program may authorize retroactive eligibility for trainees whose eligibility recently expired under the 48-month eligibility requirement. Starting Program Year 2026-2027, Eligible Job Trainees whose eligibility has ended under the previous requirement will be granted retroactive eligibility if they have met the criteria to be an Eligible Job Trainee within the last five years. Additionally, an Eligible Job Trainee may come from a contractor/organization that is participating in the CEJA or FEJA-funded Solar Contractor Accelerator Program. This training program is intended to help develop a diverse, inclusive, quality energy contracting community, specifically targeted to help minority-/women-/disadvantaged-/veteran-owned contracting businesses seeking to expand into the solar marketplace.

Contractor organizations participating in CEJA or FEJA Workforce Development Programs will have the option to designate up to two individuals from their organization as Eligible Job Trainees. Each of these individuals must have participated in 50% of the foundational components of the CEJA or FEJA training with which the organization participated. Foundational components are the sessions with content shared across all contractor organizations in the Program, versus consulting and coaching specific to the contractor, and general sessions open to non-Program participants. Designated Trainees will be identified on a trainee designation form, signed by the contractor and a representative from the CEJA or FEJA Workforce Development Program.

The Program Administrator will work with CEJA and FEJA Workforce Development Programs to create opportunities for Approved Vendors to connect with and learn about contractors engaged in CEJA or FEJA training.

Approved Vendors will be required to provide proof of enrollment and program credit progress for the Eligible Job Trainee on an individual basis. Eligible Job Trainees from both CEJA and FEJA Workforce Development programs and Other Qualifying Programs are given equal consideration and no longer require Approved Vendors to prioritize recruitment from CEJA and FEJA Workforce Development Programs.

Please note that Eligible Job Trainees are not synonymous with Equity Eligible Persons (EEPs) designation. Approved Vendors complying with MES must meet the requirements laid out in Section 15.3 and consult the [Energy Equity Portal](#) for more information on EEPs and job training programs. Please note that not all qualifications to be an Equity Eligible Person are the same as meeting the qualifications to be an Eligible Job Trainee. Eligible Job Trainees will still need to come from Qualified Job Training Programs found in the [ILSFA Job Training Directory](#).

The Approved Vendor must submit a Job Trainee Affidavit to the Program Administrator for each Eligible Job Trainee who worked on the project upon Part II project approval submission. The Job Trainee Affidavit identifies the names of the qualified training program and eligible trainee(s) used for each project as well as eligible trainee contact information, types of job tasks completed, hours worked, and wages for the job trainee(s), and hours worked by the Approved Vendor’s or their subcontractor’s/installer’s staff. Proof of course completion from the qualified training program that includes the eligible trainee’s name and date of completion must be attached to the Job Trainee Affidavit. This can be a certificate or an email from the qualified training program. Both the Approved Vendor and eligible trainee(s) must complete and sign the Job Trainee Affidavit after the eligible trainee’s time on the project is completed. Failure to meet the job training requirements across directly managed projects and subsidiary-managed projects can affect the Approved Vendor’s qualified status for ILSFA. Failure to meet a single year’s target will lead to a probationary status. If job training hours are met in the following year, the Approved Vendor will again be on active status. Failure to meet the job training requirements two years in a row

will result in suspension from the Program. Approved Vendors on probation can also be suspended for not meeting other Program requirements.<sup>96</sup>

Approved Vendors can apply for a Job Training Project waiver for individual projects. The waiver is limited in scope and must demonstrate a good-faith effort to meet the requirements. If approved, the hours for the waived project will not count toward cumulative annual goals. See the waiver description in Section 15.2.3.

### 15.3.2 WORK PERFORMANCE TRACKING AND THE ROLE OF THE JOB TRAINEE ON ILSFA PROJECTS

The Eligible Job Trainee(s) may participate in ILSFA projects in a direct or support role in the categories of System Design, Installation, System Commissioning, and Operations/Maintenance, as categorized by NABCEP, or the category of Technical Sales/Other, as described below. The work assigned to trainees must require job task categories from one of the NABCEP PV certifications. The work of the trainee(s) can be on or off the project site, but must be specific to the ILSFA project.

Below is a chart providing examples of activities related to each job task category.

**TABLE 15.2. ACTIVITIES BY JOB TASK CATEGORY**

System Design	Installation	System Commissioning
<ul style="list-style-type: none"> <li>• Site assessment</li> <li>• Shading analysis</li> <li>• Electrical design</li> <li>• Mechanical design</li> <li>• Engineering</li> <li>• Procurement</li> <li>• Permitting</li> <li>• Zoning</li> </ul>	<ul style="list-style-type: none"> <li>• Install electrical</li> <li>• Roofing</li> <li>• Structural</li> <li>• Racking</li> <li>• Modules</li> <li>• Carpentry</li> <li>• Fencing</li> <li>• Health and safety</li> <li>• Battery</li> <li>• Monitoring controls</li> <li>• Foundation</li> <li>• Project management</li> <li>• Site supervision</li> </ul>	<ul style="list-style-type: none"> <li>• Interconnection</li> <li>• Visual and mechanical inspection</li> <li>• Component testing</li> <li>• Electrical testing</li> <li>• System monitoring</li> <li>• User training</li> <li>• Utility commissioning</li> </ul>
Operations/Maintenance	Technical Sales/Other	
<ul style="list-style-type: none"> <li>• Preventative maintenance</li> <li>• Corrective maintenance</li> <li>• System monitoring</li> <li>• Component testing</li> <li>• Component replacement</li> </ul>	<ul style="list-style-type: none"> <li>• Sales</li> <li>• Customer service</li> <li>• Subscriber management</li> <li>• Financial modeling</li> <li>• Project management</li> </ul>	

<sup>96</sup> See Section 3 for more information about disciplinary actions and processes.

### 15.3.3 JOB TRAINEES AND PREVAILING WAGE

As specified below in Section 15.7, for an ILSFA project that is subject to prevailing wage requirements, the applicability of those requirements depends in part on whether the worker is involved in the “construction” of the facility. Under 820 ILCS 130/2, “construction” is defined to include “all work on [the facility] involving laborers, workers or mechanics . . . [and] includes any maintenance, repair, assembly, or disassembly work performed on equipment whether owned, leased, or rented.” Because not all activities in Table 15.2 would qualify as “construction,” it is possible that a project may include some activities that Eligible Job Trainees perform but are not subject to prevailing wage requirements. However, there is no blanket exception for Eligible Job Trainees under the Prevailing Wage Act, so Approved Vendors must take care to document that Eligible Job Trainees who are engaged in construction are paid not less than the applicable prevailing wage.

## 15.4 Data Collection

### 15.4.1 THE AFFIDAVIT PROCESS

The ILSFA Eligible Job Trainee Affidavit document must be completed for each ILSFA project that utilizes Eligible Job Trainees. The affidavit includes information about the Eligible Job Trainees working on ILSFA projects, the categories of work performed, and the number of hours for each. The affidavit also includes information on the qualifying job training program for each Eligible Job Trainee. Demographic and geographic data for all staff (Eligible Job Trainees and general staff) are collected directly in the portal. Documentation of hours and salary supporting information recorded on the affidavits shall be accessible to the Program Administrator upon request for up to four years after the submission of the affidavits.

The data previously collected in the Project Summary Affidavit, in the PDF version, is now submitted online through the ILSFA Approved Vendor Portal.

A project’s review of the job training requirements must be completed prior to Part II Approval. Exceptions may be made if the Approved Vendor is already meeting its portfolio requirements.

### 15.4.2 APPROVED VENDOR ANNUAL TRACKING

Hours must be documented for all employees (non-job trainees and Eligible Job Trainees) of Approved Vendors or subcontractors/installers/agents that work on ILSFA projects in each of the five job task categories detailed above. All hours documented for each ILSFA project will be assigned to individual employees, with each employee designated as an Eligible Job Trainee or a non-trainee.

Hours associated with siting, marketing, site acquisition, and other pre-development tasks not associated with specific projects will not be included in these calculations. The hours associated with job task categories counted in the numerator should also be the categories counted in the denominator.

#### CALCULATING ANNUAL PORTFOLIO REQUIREMENTS

To calculate the percentages (with X as the numerator and Y as the denominator):

- Y will represent the total employee hours contributing to the development of the ILSFA project(s) being assessed across the five work performance categories defined above.
  - Hours will include all employees contributing to the ILSFA project(s) across these categories, whether onsite or offsite, and across the Approved Vendor’s and subcontractor’s/installer’s staff as long as they performed work in one of the five categories.
- X will equal those hours calculated in Y that are assigned to Eligible Job Trainees.

The calculation of X/Y will provide the percentage of work hours performed by Eligible Job Trainees for each ILSFA project.

#### **CALCULATING PERCENTAGE OF ANNUAL PROJECTS REQUIREMENTS**

To calculate the number of projects (with Z as the numerator):

- Z will represent the total number of projects submitted by the Approved Vendor in one Program Year for each sub-program.

The calculation of  $0.33 \times Z$  (rounded up to the nearest whole number) will provide the number of projects that have to utilize at least one Eligible Job Trainee. There are no minimum hour requirements for Eligible Job Trainee hours on individual projects. However, the Program Administrator will monitor the average hours assigned to Eligible Job Trainees for individual projects to ensure trainees are contributing to project development in meaningful ways and not simply to meet Program requirements.

### **15.4.3 REPORTING DEMOGRAPHIC AND GEOGRAPHIC DATA FOR STAFF AND SUBCONTRACTORS**

Approved Vendors are required to report on the demographic and geographic data for their staff and subcontractor(s) when submitting Part II applications, as well as demographic information about the owners of the Approved Vendor. Approved Vendors can submit a waiver if they are unable to collect the data for projects that were awarded REC contracts in the 2021-2022 Program Year (6/1/21 to 5/31/22). Projects that were awarded REC contracts in the 2022-2023 Program Year (10/31/22 – 5/31/23) and subsequent Program Years will be unable to utilize the waiver process and will be required to report the demographic and geographic data.

Section 1-75(c-20) of the Illinois Power Agency Act requires the IPA to collect this information for all employees and subcontractors involved in the construction/installation of an ILSFA project, for both Eligible Job Trainees and non-trainees.

Data requested on the Part II form will include the race, gender, and residential ZIP code of all employees (including employees of subcontractors) involved in the construction/installation of a project. Approved Vendors must provide this data at the individual employee level; however, public reporting of the data will be aggregated across all ILSFA projects. Approved Vendors will also be required to indicate whether any of the workers involved in the construction/installation of the project are graduates from FEJA or CEJA workforce development programs or Other Qualifying Programs.

## **15.5 Waiver Process**

### **15.5.1 WHEN TO APPLY FOR A JOB TRAINING PROJECT WAIVER**

Approved Vendors may submit a job training project waiver request at the project level where good-faith efforts have been made to meet job training requirements but were unsuccessful. Approved Vendors should support a claim of good-faith efforts by documentation (e.g., emails to workforce development programs or copies of job postings on employment sites). Waivers will be assessed based on the criteria defined below. If a waiver is approved, the project waived will not be included in annual calculations and will not be counted toward annual goals, whether portfolio-wide requirements or percentage of annual project requirements.

Approved Vendors are encouraged to bring job training compliance issues to the Program Administrator early in the development process. The Program Administrator will make every effort to provide resources, contacts, and guidance on locating and hiring Eligible Job Trainees. Details on every qualified, CEJA-funded job training program

can be found on the [ILSFA website](#). The Program Administrator can direct the Approved Vendor and/or their subcontractor/installer/agent to resources, contacts, hiring events, and more. The Approved Vendor is expected to proactively seek help early. Please see the [Project Waiver Evaluation Rubric](#) for guidance.

## WAIVER APPLICATIONS AND GOOD-FAITH EFFORTS

The [ILSFA Project Waiver for Job Training Requirements](#) (Project Waiver) is represented as a series of questions; the answers may demonstrate a good-faith effort on the part of the Approved Vendor and/or their subcontractor/installer/agent to meet the job training requirements. Waivers will be considered on a case-by-case basis. Each Project Waiver application will come to a determination of pass or fail based on these responses and associated documentation.

- General efforts:
  - Do you have Eligible Job Trainees currently on staff?
  - Were Eligible Job Trainees employees of your firm previously (but not currently)?
  - Do you have subcontractors/installers you have worked with in this performance year who currently have Eligible Job Trainees on staff?
  - Have you interviewed Eligible Job Trainees for positions at your firm?
  - Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Eligible Job Trainees?
  - Did you include the ILSFA job training requirement goal in your subcontract agreements?
- Outreach efforts:
  - Did you contact Qualified/Other Qualifying Training Programs directly to seek eligible trainees for hire by email, mail, and phone? Did you follow up on your request if there was no response to the first inquiry?
  - Did your outreach include information such as job descriptions, locations, pay scale and benefits, and more?
  - Did you invite subcontractors/installers with Eligible Job Trainees to bid for this project?
  - Did you contact employees to gain referrals to Qualified/Other Qualifying Training Programs?
  - Did you advertise Eligible Job Trainee employment opportunities on job boards?
  - Did you provide a clear explanation of the work opportunity to attract Eligible Job Trainees?
- Did you contact the Program Administrator to share any challenges, discuss strategies, or seek help in finding Eligible Job Trainees?

Within the Project Waiver, the good-faith effort explanation must include all supporting documentation, including emails, contact numbers, timelines, dates, and any other relevant information. Missing or incomplete information is not considered. Please see the [Project Waiver Evaluation Rubric](#) for guidance.

## 15.6 Job Training Requirements Compliance Assessment

### 15.6.1 VALIDATION

To ensure Approved Vendors are complying with the job training requirements of the ILSFA program, the Program Administrator will conduct randomized validation checks with registered job trainees and/or job training program providers/facilitators to verify data provided by the Approved Vendors. Twenty percent of the Approved Vendor projects will be randomly selected for verification on a recurring basis. Approved Vendors who are found to have missing or insufficient information for a given project will be notified of their non-compliance and be given the opportunity to make corrections and/or supplement that information. If the Program Administrator determines a project cannot be brought to compliance after a reasonable effort to do so, the following remediation will apply.

## 15.6.2 REMEDIATION

For projects failing to meet the informational requirements set forth in these requirements, eligible trainee hours will not count toward annual goal requirements. If it is determined that an Approved Vendor has provided false or misleading information on a project, eligible trainee hours will not count toward annual goal requirements, and the Approved Vendor will be placed on a probationary status, as detailed in Section 3 of this Manual.

Instances of an Approved Vendor providing false or misleading information in project submissions, or the discovery of subsequent infractions while an Approved Vendor is on probationary status, may lead to suspension from the Program.

## 15.7 Job Training Resources and Tools

### 15.7.1 WORKFORCE DEVELOPMENT RESOURCES

To achieve successful results within the Workforce Development framework of the ILSFA program, Approved Vendors should be aware of avenues—such as job fair events, job boards, and job training organizations—where they can recruit eligible trainees and identify the type of tasks appropriate for them. They should be knowledgeable of Title 83, Part 46 of the Illinois Administrative Code, where “Qualified Person” is defined, to best assist them when working with eligible trainees from OQPs. Additionally, Approved Vendors/contractors should become familiar with best practices in creating quality work-based learning experiences.

- Learn about CEJA Training Programs:
  - The [ILSFA Job Training page](#): This page contains updated lists of CEJA Workforce Development Programs and OQPs as they are approved.
  - [The Illinois Climate and Equitable Jobs Act \(CEJA\)](#) website: This website contains information for students and job seekers, contractors and developers, and employers.
- Learn about the [Energy Workforce Equity Portal](#):
  - This page contains information to help connect Approved Vendors with Equity Eligible Persons who may meet the criteria as an Eligible Job Trainee for the ILSFA job training requirements.
- Learn the type of work tasks that count toward an Eligible Job Trainee’s hours on ILSFA sites:
  - The training and work experience Approved Vendors and their contractors provide to Eligible Job Trainees must line up with NABCEP PV Job Task Categories. This is meant to ensure that the ILSFA program is providing experiences and skill development specific to the industry as the Program seeks to develop a robust and qualified solar workforce through its projects. Vendors can learn more details about the NABCEP Job Task Categories on the NABCEP website, where NABCEP certifications are broken down into these specific categories and related tasks.
- Visit the [NABCEP website](#):
  - NABCEP PV Certification Job Task Analysis (JTAs)
    - [Photovoltaic Specialists Job Tasks Analysis \(Photovoltaic Design, Photovoltaic Installer, Photovoltaic Commissioning, and Maintenance\)](#)
    - [PV Installation Professional Job Task Analysis](#)
    - [PV Technical Sales Job Task Analysis](#)
    - [PV System Inspector Job Task Analysis](#)
- Learn about Part 46 and the definition of a Qualified Person when hiring from an OQP. Approved Vendors should know what a Qualified Person is, per Title 83, [Part 468](#) of the Administrative Code.
- Establish best practices that create quality work-based learning opportunities for trainees. Incorporate that offering into the overall recruitment strategy to fulfill not only the job training requirement of ILSFA but also as a feature of overall business development.

- The ILSFA job training requirement fits into a larger strategy of meeting the goal of building a strong solar workforce while also connecting talented individuals from disadvantaged communities to career pathways. The Strategies for Solar Workforce Development Toolkit (created by the Solar Foundation under Solar Training Network funding from the U.S. Department of Energy) offers tools and considerations that Approved Vendors and contractors can consider as they incorporate recruitment and engagement of trainees into their business.

## **15.7.2 PROGRAM ADMINISTRATOR SUPPORT**

The IPA and Program Administrator realize the potential barriers for Approved Vendors in finding Eligible Job Trainees for their projects (and the challenge trainees may face in finding opportunities) and will do their best to facilitate the connection of Approved Vendors to Eligible Job Trainees.

Two ILSFA Program Administrator staff members will be designated resources for Approved Vendors to ensure their understanding and fulfillment of the ILSFA job training requirements: the Approved Vendor's assigned Vendor Manager and the Workforce Program Manager.

All Approved Vendors will be assigned a Vendor Manager. All Vendor Managers for ILSFA will work in coordination with the Workforce Program Manager. The Workforce Program Manager will work closely with CEJA Workforce Development Programs and OQPs as they are documented and approved.

During regularly scheduled meetings, the Vendor Manager will provide orientation on, and support in, meeting ILSFA program requirements, including the job training requirements, and address questions and concerns as they come up. Although locating eligible trainees is the ultimate responsibility of the Approved Vendor and their contractors, the Program Administrator team will provide training program information and liaise between training programs and Approved Vendors to facilitate trainee recruitment. The Program Administrator team is invested in seeing Approved Vendors succeed in the Program and will update resources and materials to incorporate feedback and other Program changes or provide clarifications as needed.

## **15.8 Minimum Equity Standard (MES) Requirement**

### **15.8.1 OVERVIEW**

The Clean and Reliable Grid Affordability Act (CRGA), signed into law in January 2026, provides Approved Vendors participating in ILSFA with a second option to meet their Portfolio Requirement, by meeting the Minimum Equity Standard. The Minimum Equity Standard (MES) is a cornerstone of the Equity Accountability System, designed to ensure a fair representation of Equity Eligible Person(s) (EEPs) and Equity Eligible Contractors ("EECs") in the clean energy sector. The MES establishes a minimum percentage of the project workforce that must consist of EEPs or EECs (defined below), fostering an inclusive workforce and promoting equity within the clean energy economy. The reporting requirements within this section are required for all Approved Vendors that select compliance with the MES to satisfy their workforce requirements.

Approved Vendors that opt to meet the MES must ensure that their project workforce consists of a minimum percentage of EEPs. For the 2026-27 Program Year the MES requirement is 14%, meaning that 14% of the workforce on projects developed for the Program must be made up of EEPs. The MES requirement will then increase to 18% for the 2027-28 Program Year. The IPA Act explains that the minimum percentage must increase to ensure a statewide average of 30% by 2030.

Compliance with the MES is monitored through the submission of an MES Combined Compliance Plan and Year-End Reports and Mid-Year Reports by participating entities.

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

- Submitting projects to ILSFA
- Performing construction on any project intended on being submitted to ILSFA
- Conducting any sales or marketing activity for projects that have been or will be submitted to the Program
- Managing subscriptions for a Community Solar project that holds a Renewable Energy Credit (REC) contract (including projects approved prior to the passage of the Climate and Equitable Jobs Act)
- Maintaining a project on a waitlist
- Otherwise conducting business on a project seeking or that holds a REC contract

## 15.8.2 DEFINITIONS

### EQUITY ELIGIBLE PERSON

The IPA Act (20 ILCS 3855/1-10) defines Equity Eligible Persons as “persons who would most benefit from equitable investments by the State designed to combat discrimination, specifically:

- (1) persons who graduate from or are current or former participants in the Clean Jobs Workforce Network Program, the Clean Energy Contractor Incubator Program, the Illinois Climate Works Pre-apprenticeship Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multi-cultural jobs program created in paragraphs (a)(1) and (a)(3) of Section 16-108.21 of the Public Utilities Act;
- (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](#).”

### EQUITY ELIGIBLE CONTRACTOR

An Equity Eligible Contractor (EEC) is defined as “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 [equity] eligible person offering personal services as an independent contractor.”

### EQUITY INVESTMENT ELIGIBLE COMMUNITIES

Equity Investment Eligible Communities (“EIECs”) are defined as “geographic areas throughout Illinois which would most benefit from equitable investments by the State designed to combat discrimination.” The eligible communities include:

- (1) R3 Areas as established pursuant to Section 10-40 of the Cannabis Regulation Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector; and
- (2) Environmental Justice Communities, as defined in the IPA Act, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.

### PROJECT WORKFORCE

For the purposes of the MES, “project workforce” is defined as:

*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 Sections 1-75(c) and 1-56(b)(2) 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.*

Only workers whose duties are physically performed in Illinois should be included in the “project workforce,” regardless of where they live. Individuals who do not physically work in Illinois do not count toward the project workforce. For example, if a worker is remote and physically working outside of Illinois, they do not count toward the project workforce, even if they are doing work on ILSFA projects.

In ILSFA, an Approved Vendor’s project workforce will include all individuals employed, either directly or through any contractors or subcontractors, during the Program Year who work on ILSFA projects.

Additionally, ‘directly required by or substantially related to’ shall be construed to be any direct employee of the Approved Vendor 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 if the Approved Vendor includes at least one such contractor whose contract is less than 5% of the REC contract value, then all contractors below the 5% of REC contract value threshold must also be included.

EEC Approved Vendors and Approved Vendors that partner with EECs may count the EEPs employed by the EEC business, including the EEP majority-owner, 1.5 times in calculating compliance with the MES.

## 15.9 Minimum Equity Standard Reporting Requirements

### 15.9.1 OVERVIEW

#### MES COMBINED COMPLIANCE AND YEAR-END REPORT

The MES Combined Compliance and Year-End Report is due 45 days after the end of each Program Year (on or around July 15th) and includes two sections: a backward-looking section for Approved Vendors to show how they met the previous Program Year's MES, and a forward-looking section for Approved Vendors to detail their plans to meet the MES in the upcoming Program Year. If the entity did not participate during the previous Program Year or will not participate in the following Program Year, that may be indicated at the beginning of the report, and compliance obligations will not apply to that particular Program Year. A description of the requirements for each section of the report is included below.

The forward-looking portion of the report, the Compliance Plan, will demonstrate how the Approved Vendor plans to achieve compliance with the MES percentage for work completed in the upcoming Program Year. If an entity applies to be an Approved Vendor during a Program Year, the Agency will require a Compliance Plan (the forward-looking portion of the report) at the time of the initial application. Approved Vendors that are affiliated with each other may be allowed to submit one MES Combined Compliance and Year-End Report where they have a common parent company.

Information collected in this portion of the report includes:

- A statement of intent to comply with equity accountability standards for the applicable Program Year and hire a diverse project workforce, including Equity Eligible Persons and Equity Eligible Contractors. This will include a narrative description of how the applicant will meet these commitments.
- Projected number of workers and the demographic breakdown by race, gender, and participation in job training or workforce development programs, or other means of compliance with the standard for EEPs.
- Plans for the use of Equity Eligible Contractors, if applicable.
- Company classification (i.e., Minority-owned, Woman-owned, Disabled-owned, Veteran-owned, Small Business), if applicable.
- Communication plan for local outreach to increase the utilization of Equity Eligible Persons and Equity Eligible Contractors.

The backward-looking portion of the report, the MES Year-End Report, will confirm whether an entity met the MES requirement through data on project workforce, demographic data, and supporting documentation.

Data and information required to be submitted in this portion of the report include:

- Approved Vendor/Designee/Subcontractor information
- Project workforce total
- Project workforce demographic and geographic information
- EEP workforce totals, including proof of EEP eligibility and any supporting documentation for any EEPs not registered in the IPA's Energy Workforce Equity Portal (e.g., for individuals that qualify based on residency in an Equity Investment Eligible Community, submission of proof of primary residence will be required)
- Description of outreach efforts employed by the Approved Vendor to recruit EEPs
- Job training program graduate hiring data
- Illinois-based workforce diversity data
- Other diversity and workforce data

As the MES requirements are new for ILSFA in the 2026-2027 Program Year, Approved Vendors that choose to comply with the MES will not have a backward-looking portion of the MES Combined Compliance and Year-End Report in July 2026. The MES Combined Compliance and Year-End Report due in July 2027 will include both the forward and backward-looking portions of the report.

## **MES MID-YEAR REPORT**

Halfway through the Program Year, each Approved Vendor must respond to a written inquiry from the Agency or Program Administrator by submitting a Mid-Year Report confirming that their Minimum Equity Standard Compliance Plan is progressing in accordance with MES requirements. If an Approved Vendor indicates that it is struggling to meet the MES, the Program Administrator will provide additional resources to support successful compliance. These reports will not be scored.

### **15.9.2 SCORING**

#### **MES COMBINED COMPLIANCE AND YEAR-END REPORT**

Submitted MES Combined Compliance and Year-End Reports will be reviewed to confirm that all required information has been provided. Fully submitted reports are reviewed and either approved or denied.

### **15.9.3 REPORTING SCHEDULE**

- June 1: MES Combined Compliance and Year-End Report for the current Program Year opens for submissions
- July 15: Deadline for submission of MES Combined Compliance and Year-End Report
- December 1-30: Window to submit MES Mid-Year Report

## **15.10 Equity Eligible Person Registration**

### **15.10.1 OVERVIEW**

To meet the MES, entities must ensure that the required number of Equity Eligible Persons (EEPs) in their workforce is verified. Entities can [register EEPs](#) via their MES Combined Compliance and Year-End Report or through the [Energy Workforce Equity Portal](#).

## 15.10.2 PROCESS

The MES Combined Compliance and Year-End Report will require data for all EEPs in the project workforce during the relevant Program Year. The Program Administrator will verify EEP eligibility as part of the review process. Approved Vendors have two options for how to provide this data.

1. The Approved Vendor can encourage all EEPs in their project workforce to register in IPA's [Energy Workforce Equity Portal](#).

This option allows the Approved Vendor to simply provide the names of the registered EEPs in its MES Combined Compliance and Year-End Report.

2. The Approved Vendor can collect signed EEP attestations and supporting documentation for their EEPs and provide them to the Program Administrator. This option allows the Approved Vendor to provide the names of the EEPs along with all required documentation in the MES Combined Compliance and Year-End Report.
  - a. Download the [EEP attestation](#)
  - b. 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.
    - i. 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).
    - ii. For EEPs who qualify based on primary residence, please provide the individual's driver's license, utility bill, pay stub, lease, or mortgage.

## 15.11 Equity Eligible Contractor Registration

### 15.11.1 OVERVIEW

ILSFA Approved Vendors and Designees may benefit from registering as an Equity Eligible Contractor ("EEC") in Illinois Shines. Not only are EECs allowed to participate in the Equity Eligible Contractor Category of Illinois Shines, but EEC Approved Vendors and Approved Vendors that partner with EECs may count the EEPs employed by an EEC at 1.5 times in calculating MES compliance, so there are benefits in ILSFA not just for Approved Vendors to register as EECs, but for Designees and Subcontractors as well. The Clean and Reliable Grid Affordability Act (CRGA), signed into law in January 2026, enables ILSFA Approved Vendors to meet their project workforce requirement through the Minimum Equity Standard, which was designed, in part, to ensure fair representation of EECs in the clean energy sector. There are three different ways to register as an EEC: EEC Approved Vendor, EEC Designee, or EEC Subcontractor.

Qualification for EEC certification is assessed at the ownership/partner/proprietor level of a company (or board level in the case of non-profit organizations). The majority (at least 50%) of a company's ownership must qualify as an Equity Eligible Person (EEP) by meeting one of the qualifications as described in Section 15.8.2.

### 15.11.2 CERTIFICATION PROCESS

The following information is required for EEC certification: If the entity is organized as a corporation, general partnership, limited liability partnership, limited liability company, or limited partnership, the applicant will be asked to designate which owners, partners, or proprietors meet the EEC eligibility criteria. If the entity is organized as a non-profit, the applicant will be asked to provide the board membership of the non-profit and designate

which board members meet the EEP eligibility criteria. If the entity is a sole proprietor, no additional designations are required.

For the EEC certification, the entity must complete a form identifying the corporate ownership structure and what role the EEP plays (e.g., Joint Partnership, Sole Proprietor, Board Member) in the business and an attestation completed by the EEP majority-owner, selecting the basis (or bases) upon which the individual qualifies as an Equity Eligible Person and providing verifying documentation where required (for primary residence or workforce training participation qualifying bases). An EEC must be majority-owned by an Equity Eligible Person, not another Equity Eligible Contractor.

EECs will need to recertify as an EEC each year alongside the annual renewal of their Approved Vendor, Designee, or subcontractor status. As part of that process, EEPs that serve as the majority-owner of an EEC and qualify as an EEP based on residency will be required to re-certify their status as an Equity Eligible Person. For EECs majority-owned by EEPs that qualify based on one of the other criteria, this re-certification will only require confirmation of continued majority-ownership by the EEP(s).

### **15.11.3 EEC MANAGEMENT AND CONTROL**

As outlined in the 2026 Long-Term Plan approved by the ICC, beginning June 1, 2026, EEC Approved Vendors will be required to submit information to demonstrate that the EEP majority-owner of the entity actually controls and manages the business. Those individuals must be in direct control of the day-to-day operations or direct the management of those day-to-day operations, and must have and exercise the power to make major decisions on management, policy, fiscal, and operational matters. The EEP majority-owners' management and control must be evident to the Agency based on a holistic evaluation of the following:

- i. How the owner EEPs were involved at the time of incorporation;
- ii. The duties of the owner EEPs;
- iii. The rights, voting power, and other authorities held by the owner EEPs;
- iv. The owner EEPs' role in decision making;
- v. Whether the owner EEPs have sufficient background, including work experience, education, or training, to run the business;
- vi. Whether the owner EEPs negotiate contracts and loans, prepare estimates, and make other supervisory decisions;
- vii. Any shareholder rights that would dilute or eliminate owner EEPs' control or affect owner EEPs' voting rights; and
- viii. Whether the owner EEPs hold other employment outside the EEC and, if so, the relationship of that business or entity to the EEC business.

The Approved Vendor seeking EEC designation will have two pathways to show management and control. The first pathway will be for entities that have a business certification from qualifying programs. The second pathway will be to demonstrate management and control through the submission of documents for the Agency's review and consideration. An Approved Vendor seeking certification as an EEC Approved Vendor is able to register through the first mechanism if they have a qualifying business designation as a:

- i. Minority or Women-Owned Business Enterprise (MWBE);
- ii. Business Enterprise Program (BEP);

- iii. Disadvantaged Business Enterprise (DBE);
- iv. 8(a) Business Development Program; or
- v. An alternate certification of majority-owner status of a historically disadvantaged group.

The Agency may also consider alternative historically disadvantaged business certifications. Entities with one or more of the above certifications will be required to submit their certification documentation and proof of the majority owner's certification as an EEP.

Entities that have not been previously certified through one of the above programs will need to utilize the second pathway. In order to show that one or more EEP majority-owners have control and management of the business, the Approved Vendor must provide an attestation signed by the EEP(s) stating that they manage and control the business, along with one or more documents that satisfy the following categories:

- i. Corporate ownership structure, demonstrated by:
  - a. operating agreement,
  - b. articles of incorporation,
  - c. articles of organization, and/or
  - d. partnership agreement.
- ii. Role(s) the EEP majority owner(s) plays in the business, demonstrated by:
  - a. operating agreement,
  - b. corporate bylaws,
  - c. board meeting materials,
  - d. current organization chart,
  - e. professional license or registration,
  - f. resume,
  - g. facility information (such as a lease agreement or proof of ownership),
  - h. equipment information (such as a title or lease documentation), and/or
  - i. financial information (such as bank statements, signature cards, tax returns, loan agreements, or letters of credit).

The Agency may consider alternative documentation if the Agency determines that it aligns with the objectives of the management and control requirement. Approved Vendors seeking to establish EEC certification may be required to submit additional evidence of control and management by the majority-owner EEP, including, but not limited to, more than one of the above-referenced documents. Moreover, if the above documentation cannot or does not sufficiently show that an EEP manages and controls the business, the Agency may request an interview or site visit to make a final certification designation. EECs will be required to renew their certification annually, and if no change has occurred in the business structure, they may renew by an affidavit of no change. Certification determinations will be appealable to the IPA.

Approved Vendors with a current EEC certification will have to provide documentation showing management and control of the business by the EEP majority-owner(s) at the next recertification in order to maintain their EEC status. Entities that are not recertified as EECs at their next recertification will have six months from the loss of certification to come into compliance by obtaining a certificate from a designated program or proving management and control to the Agency.

## 15.12 Minimum Equity Standard Requirement Waiver, Corrective Action Plan (CAP), and Safe Harbor

### 15.12.1 OVERVIEW

If the Agency determines that an Approved Vendor that selected to comply with the MES workforce requirements has failed to comply with any of the requirements set forth by the Agency to ensure compliance with the MES, the entity will be notified of its non-compliance via Notice of Potential Violation (“NOPV”) and given an opportunity to either re-submit a compliant MES Combined Compliance and Year-End Report, submit a waiver request, or enter into a Corrective Action Plan. If the entity fails to respond to the non-compliance notification, or if it is still found that the entity is not compliant with the MES, the entity will be issued an official warning letter. If the entity fails to respond to the warning letter or is still found to be non-compliant with the MES, the entity will be issued a suspension letter and given the opportunity to submit a Corrective Action Plan.

Under the ILSFA program, Corrective Action Plans cannot be entered into until an Approved Vendor has completed a full Program Year of complying with MES requirements in ILSFA. Since this is the first year of MES requirements under the Program, Corrective Action Plans will not go into effect until Program Year 2027-2028 (for Approved Vendors who failed to comply with requirements in Program Year 2026-2027). The Program will provide additional language on Corrective Action Plans in the 2027-2028 Approved Vendor Manual, which will include a period of comments for stakeholder feedback.

### 15.12.2 MES WAIVER

The Agency may grant a waiver from this requirement in rare cases. The Agency will grant waivers where the applicant provides evidence of significant due diligence toward meeting the Minimum Equity Standard including, but not limited to, having submitted an MES Mid-Year Report. Entities may be granted a waiver by receiving a minimum score of 20 points (16 points for entities that do not work with subcontractors) based on the MES Waiver scoring rubric. The Agency has developed a waiver request template for both union and non-unionized workforces. Community Solar waiver requests are required to be submitted on a per-project basis. Distributed Generation waivers may be submitted on a portfolio level basis, covering all applicable projects for a given Program Year. Waivers will be available on the [Energy Workforce Equity Portal](#).

### 15.12.3 MES CORRECTIVE ACTION PLAN

The objective of a Corrective Action Plan (CAP) is for the entity to come into compliance with the MES. Under a CAP, the entity must complete required activities, indicate any additional activities it plans to take, and specify expected outcomes, timelines, and methods of documentation to demonstrate progress. The Agency and Program Administrator will review submitted CAPs and notify the submitting entities of their sufficiency.

The following activities are required for all entities that submit a complete Corrective Action Plan. Prioritization of these requirements is necessary for future reinstatement into the Program.

1. Conduct outreach and recruitment with [EEP-qualifying workforce development programs](#)

2. Conduct outreach to workforce training programs and community-based organizations that work with individuals who are graduates of or currently enrolled in the foster care system and/or who were formerly incarcerated
3. Conduct outreach with workforce training programs and community-based organizations that work with individuals residing in EIEC Communities
4. Review previous applicant records to identify individuals who may be contacted for future project employment opportunities
5. Participate in job fairs (virtual or in-person) and related community events to expand recruitment efforts
6. Register on the Energy Workforce Equity Portal as a Clean Energy Company
7. Post jobs on the Energy Workforce Equity Portal
8. Conduct outreach to Equity Eligible Persons listed on the Energy Workforce Equity Portal looking for employment opportunities
9. Engage in direct and extensive outreach to trade associations or other relevant industry organizations to notify them of employment opportunities
10. Increase marketing efforts on platforms used to announce or publicize available employment opportunities, such as employment websites, alumni listservs, union halls, and social media
11. Publicize employment opportunities on state-sponsored platforms, such as [Illinois WorkNet](#) or [Illinois Job Link](#)

Entities can indicate any of these additional activities that it will take to become compliant with the Minimum Equity Standard:

- Identify percentage of the existing workforce that qualify as EEPs due to their primary residency within an Equity Investment Eligible Community (EIEC)
- Conduct direct outreach to EECs listed on the Energy Workforce Equity Portal website to explore subcontracting opportunities
- Engage with organized labor unions, community colleges, and community-based organizations to notify them of employment opportunities
- Meet with Program Administrator to review recruitment and hiring plans for current and upcoming opportunities
- Engage in EEP/EEC recruitment efforts

Additionally, the entity will be asked to provide detailed and actionable steps the entity will take to ensure compliance and support equitable access to the clean energy economy.

The entity will remain suspended and unable to submit new projects into the Program until it has been reinstated. When an entity has implemented the items described in its Corrective Action Plan, it may apply for reinstatement in the Program. To do so, the entity must submit an attestation to the Program Administrator describing the implementation steps taken and how they resulted in progress toward meeting the MES. This request for reinstatement must include supporting documentation for all implementation steps described.

#### **15.12.4 MES SAFE HARBOR APPROACH**

To ensure the Minimum Equity Standard is implemented in a manner that is both equitable and practicable, particularly for small businesses, the Agency has developed a Safe Harbor approach for Approved Vendors with very small workforces. For these entities, strict percentage-based compliance may result in a fractional hiring requirement that is not operationally feasible. The Safe Harbor approach provides an alternative pathway that allows such entities to demonstrate good-faith efforts toward compliance through a set of defined outreach and recruitment activities. This policy recognizes the unique constraints of smaller businesses while still advancing the underlying equity goals of the MES.

Entities that are eligible for the Safe Harbor approach are those that (1) have an Illinois-based project workforce that is small enough such that the MES percentage calculation results in less than one person, (2) hired new staff during the Program Year, and (3) did not hire an EEP and do not otherwise meet the MES by having an EEP on staff. In addition to meeting these three eligibility requirements, the entity must also demonstrate good-faith efforts to comply with the MES.

To demonstrate a good-faith effort to comply with the Minimum Equity Standard, qualifying entities must complete at least one activity in three of the five categories from the list below. Failure to perform at least one activity in three of the five categories during the relevant Program Year will result in a finding of non-compliance with the Minimum Equity Standard. These activities are designed to ensure meaningful efforts are made to recruit and hire EEPs or engage Equity Eligible Contractors (EECs).

#### 1. Utilize the Energy Workforce Equity Portal

- Register the organization as an employer on the Energy Workforce Equity Portal and, for any hiring done during the Program Year, post job opportunities to the Equity Portal.
- Conduct direct correspondence with EEPs who are seeking work in the sector, raising awareness of job opportunities within the organization.
- Conduct direct outreach to EECs listed on the Equity Portal to explore meaningful partnerships and subcontracting opportunities.

#### 2. Engage in Local and Community-Based Recruitment Efforts

- Participate in at least one job fair (virtual or in-person) that is specifically focused on or located in an Equity Investment Eligible Community (EIEC).
- Conduct outreach to community-based organizations or community colleges to advertise job opportunities and recruit EEPs.

#### 3. Conduct Outreach to Specific Equity-Focused Groups

- Collaborate with EEP-qualifying workforce development programs, such as those supporting formerly incarcerated individuals or foster care graduates, to identify and recruit eligible candidates.
- Advertise employment opportunities with community-based organizations or economic development organizations working with individuals residing in EIEC areas.

#### 4. Post Job Opportunities on State-Sponsored Platforms

- Publicize employment opportunities on platforms such as Illinois Job Link or Illinois WorkNet to reach a broader audience of potential candidates.

#### 5. Collaborate with the Program Administrator

- Meet with the Program Administrator to review hiring plans and receive feedback on recruitment strategies aimed at engaging EEPs or EECs effectively.
- Attend a webinar conducted by the Program Administrator on MES-related topics.

Entities are required to maintain records of their recruitment and outreach efforts. That documentation includes items such as:

- Copies of outreach communications with EEPs or EECs
- Copies of job postings on state-sponsored platforms
- Evidence of participation in job fairs or community events

- Communication logs or collaboration agreements with workforce development programs, community-based organizations, unions, and more

This documentation must be provided as part of the entity’s MES Combined Compliance and Year-End Report. Failure to perform at least one activity in three of the five categories during the relevant Program Year will result in a finding of non-compliance with the Minimum Equity Standard. Absent a waiver or demonstration of compliance through having an EEP on staff, that finding of non-compliance shall result in suspension from the Program. Entities are encouraged to proactively seek guidance from the Program Administrator to ensure they meet these expectations.

## 15.13. Prevailing Wage

### 15.13.1 PREVAILING WAGE REQUIREMENTS AND EXCEPTIONS

As outlined in Section 1-56(b-15) of the IPA Act, with certain exceptions detailed below, projects that receive REC payments through ILSFA are subject to Illinois Prevailing Wage Act requirements (820 ILCS 130/1, et seq.). Prevailing wage is a minimum compensation level by county set by the Illinois Department of Labor for construction activities related to public works. Section 1-56(b-15) of the IPA Act (20 ILCS 3855) requires that individuals engaged in the construction of certain projects submitted to ILSFA are paid the prevailing wage for their job classification and the project location.

This prevailing wage requirement does not apply to the following types of projects:

- Residential Solar (Small) or Residential Solar (Large) sub-program projects that serve single family or multifamily residential buildings
- Non-Profit and Public Facilities sub-program projects that serve a house of worship<sup>97</sup> and are less than 100 KW AC (aggregated with any co-located projects)
- Community Solar or Non-Profit and Public Facilities sub-program projects that were submitted prior to June 30, 2023, the effective date of P.A. 103-0188

Note, however, that these projects may still be subject to prevailing wage requirements based on other funding sources, legal requirements, or changes in the project design occurring after submittal that would cause the project to no longer fit within an exception. For projects that do not fall into one of the above exceptions, all construction activities, including repairs and maintenance, occurring after June 30, 2023, are subject to prevailing wage requirements.<sup>98</sup> This includes notifying all contractors and subcontractors that all workers must be paid the applicable prevailing wage rate and the requirement for posting notice at the worksite.

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<sup>97</sup> “House of worship” is defined as a property that is both (1) used exclusively by a religious society or body of persons as a place for religious exercise or religious worship; and (2) recognized as exempt from taxation pursuant to Section 15-40 of the Property Tax Code.

<sup>98</sup> The Prevailing Wage Act defines “construction” to include maintenance, repair, assembly, or disassembly work performed on equipment.

Projects that do not qualify for one of the above exceptions and are undertaken pursuant to one or more of ILSFA's sub-programs are subject to all provisions of the Prevailing Wage Act. The Illinois Department of Labor ("IDOL") oversees the implementation and enforcement of the Prevailing Wage Act and has multiple resources, such as FAQs, available on its website.<sup>99</sup> The Prevailing Wage Act requires that employees engaged in construction activities related to the project be paid at least the prevailing wage rate of that location, as determined by the IDOL annually and updated regularly on its website. The Approved Vendor, its contractors, and any subcontractors employing workers on a project must provide written notice to all of their contractors and subcontractors that the Prevailing Wage Act applies to the project, including notice and record-keeping requirements. Penalties and fines for violations may be imposed on upstream contractors if they do not provide proper notice to subcontractors. Workers engaged in construction activities must be given written notice of the applicable prevailing wage rates by posting those rates on the work site, at a central office, or through direct written communication. Each contractor and subcontractor under contract for construction activities for the project must submit a Certified Transcript of Payroll ("CTP") to the IDOL Certified Transcript of Payroll Portal monthly for any period in which construction activities have occurred.<sup>100</sup> Templates for the CTP and additional details on what to include may be found on the IDOL website. Approved Vendors must also submit all CTPs from the relevant project to the Program Administrator via the Part II application, as discussed in Section 8.6.

As noted in Section 8.5, Part I of the project application for all ILSFA projects requires Approved Vendors to complete an attestation and acknowledgment of prevailing wage requirements applicable to certain ILSFA projects, and the Program Administrator's Part I verification will include a review of the applicability of prevailing wage requirements, including whether the Part I application demonstrates that the project fits within any of the exceptions listed above. In Part II of the project application, the Approved Vendor will be required to certify and document compliance with prevailing wage requirements, if applicable. If the Program Administrator determines that an Approved Vendor or its contractors and/or subcontractors have not complied with applicable Prevailing Wage Act requirements for a project, Part II approval and any incentive payments will be withheld until the Approved Vendor demonstrates that it has corrected the noncompliance. Proof of correction of noncompliance, including documentation of payment of any unpaid wages to impacted workers, will be required for the Program Administrator to proceed with Part II verification.

All projects subject to prevailing wage requirements are subject to audit by the Program Administrator to verify compliance. This auditing includes a requirement to admit the Program Administrator or their representatives to work sites for ongoing projects, access to speak to employees who are working or have worked on ILSFA projects, access to requested documentation demonstrating payment of wages including but not limited to CTPs, and any other information the Program Administrator or IPA deem necessary to confirm compliance with the Prevailing Wage Act.

Failure to comply with prevailing wage requirements is considered a violation of ILSFA requirements in accordance with Section 3.6 of this Approved Vendor Manual. While the IPA may refer potential violations of the Prevailing Wage Act to the IDOL for further investigation and enforcement, the IPA may also take disciplinary action against any Approved Vendor or Designee found to have violated the Prevailing Wage Act on a project for which there was a REC contract under ILSFA.

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<sup>99</sup> [Illinois Department of Labor](#)

<sup>100</sup> Information on [how to access the portal](#) is available.

## COMPLETING CERTIFIED TRANSCRIPTS OF PAYROLL

Approved Vendors and their Designees, contractors, and subcontractors working to complete CTPs will find that the current prevailing wage rate schedule does not include a labor classification for solar installers. Therefore, it is recommended that Approved Vendors and Designees, their contractors, and subcontractors consult with IDOL regarding classifications to find the appropriate rates of pay for work performed. Prevailing Wage rates change periodically, so Approved Vendors and Designees, their contractors, and subcontractors should consult the IDOL website and associated Prevailing Wage resources regularly to understand current rates.<sup>101</sup>

### 15.14 Project Labor Agreements

Section 1-75(c)(1)(T) of the IPA Act, as amended by P.A. 104-0458, now requires that Community Solar projects greater than 3 MW AC in size enter into a project labor agreement (“PLA”) prior to construction. Community Solar projects and co-located projects within the size threshold approved by the ICC for a REC contract on or after June 1, 2026, the effective date of P.A. 104-0458, are subject to this new requirement.

At a minimum, the PLA must provide the names, addresses, and occupations of the owner of the project and any individuals representing the labor organization of the employees participating in the project labor agreement consistent with the Project Labor Agreements Act. Section 1-10 of the IPA Act defines a PLA as “a pre-hire collective bargaining agreement that covers all terms and conditions of employment on a specific construction project and must include the following:”<sup>102</sup>

1. Provisions establishing the minimum hourly wage for each class of labor organization employee;
2. Provisions establishing the benefits and other compensation for each class of labor organization employee;
3. Provisions establishing that no strike or disputes will be engaged in by the labor organization employees;
4. Provisions establishing that no lockout or disputes will be engaged in by the general contractor building the project; and
5. Provisions for minorities and women, as defined under the Business Enterprise for Minorities, Women, and Persons with Disabilities Act, setting forth goals for apprenticeship hours to be performed by minorities and women and setting forth goals for total hours to be performed by underrepresented minorities and women.

A labor organization and the general contractor building the project have the authority to include other terms and conditions as they deem necessary.<sup>103</sup>

All Approved Vendors submitting Community Solar applications must attest to their awareness and intent to comply with the requirement at Part I application. Approved Vendors must submit the application’s PLA to the Program Administrator via email for evaluation following a project’s ICC approval and subsequent execution of a REC contract. The PLA does not need to be submitted to the IPA prior to the start of construction; however, because the IPA Act defines a PLA as a “pre-hire” agreement, the IPA expects that the PLA will be executed prior to the start of construction. The IPA will not be able to review PLA submissions before the underlying project receives a REC contract. The PLA should be provided to the IPA within the latter of (a) sixty (60) days prior to the start of

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<sup>101</sup> Learn more about [prevailing wage rates](#).

<sup>102</sup> 20 ILCS 3855/1-10.

<sup>103</sup> The IPA clarifies that, per the definition of a Project Labor Agreement as set in the IPA Act, a general contractor is required.

construction; (b) thirty (30) days of the execution of such Project Labor Agreement or amendment; or (c) thirty (30) days of ICC approval (the contract trade date).

All amendments to the PLA shall be sent to the Program Administrator. Project labor agreements and all related documents submitted to the Agency/Program Administrator shall be considered commercially sensitive information, the distribution of which may cause competitive harm, and will be treated as exempt from the Illinois Freedom of Information Act requests under Section 7(1)(g).

Community solar projects which are required to have a PLA in place under the IPA Act which commence construction prior to the execution of a project labor agreement may be ineligible for Part II approval if the projects were not completed with a PLA in place. Additionally, commencement of construction without an executed PLA in place may be considered an event of default under the REC Contract and the Approved Vendor may be subject to disciplinary action within the ILSFA program.

Co-located Community Solar applications with 3 MW AC in aggregate size are also subject to PLA. There may be co-located sets of projects that are over 3 MW in aggregate size for which one or more of the projects have received a REC contract by June 1, 2026, and the other project(s) receive a REC contract after that date. In these instances, only the project(s) submitted after the effective date of P.A. 104-0458 will be subject to this new requirement. The PLA requirement applies where the aggregated project size exceeds 3 MW, even if the individual project subject to the PLA requirement is less than 3 MW.

## 16. Complaint Management

Consumer protections are now addressed in the Consumer Protection Handbook, which updates and consolidates the Illinois Shines Community Solar Marketing Guidelines and Distributed Generation Marketing Guidelines, as well as the ILSFA Community Solar Consumer Protection Requirements and the Residential Solar Consumer Protection Requirements. Approved Vendors and Designees in both programs will be required to adhere to the [Consumer Protection Handbook](#).

As mentioned in the Consumer Protection requirements for ILSFA projects, income-eligible communities have often been targeted with false or deceptive marketing practices, predatory sales, unfair contracts, and poor-quality workmanship. The Consumer Protection Handbook requires that the information shared with participants is clear and accurate to ensure a transparent and positive experience for participants and to mitigate these risks. However, in the event participants have complaints, the Program Administrator recommends that participants first try to resolve the problem with the installer or Approved Vendor. Examples of possible complaints may be related to the contract, installation and maintenance, warranty, billing, or customer service. If the issue cannot be resolved, the participant may submit a complaint to the ILSFA Program Administrator by visiting the [ILSFA website](#) or by calling 1-888-970-ISFA (4732). Approved Vendors shall notify their Vendor Manager of any unresolved complaints.

Additionally, as made clear in the ILSFA Disclosure Form provided to the participant, the participant may also file a complaint regarding fraudulent or deceptive sales practices. The Consumer Protection Division of the Illinois Attorney General's office may be able to help. Participants may contact the Illinois Attorney General's office by calling one of the following hotlines:

**Chicago**  
800-386-5438  
TTY: 800-964-3013

**Springfield**  
800-243-0618  
TTY: 877-844-5461

**Carbondale**  
800-243-0607  
TTY: 877-675-9339

## 16.1. Complaint Management Requirements

The Program Administrator expects Approved Vendors to provide exemplary customer service and be responsive by quickly working to resolve issues. In addition to providing excellent customer service, being informed of all ILSFA requirements and adhering to the Marketing and Consumer Protection Requirements outlined in Section 7 of this Manual and the Consumer Protection Handbook can greatly reduce the number of participant complaints. ILSFA Approved Vendors are expected to work with participants, prospective participants, and Grassroots Education organizations in a responsive, forthright, and constructive manner. All Approved Vendors, Designees, and subcontractors are expected to conduct any and all business affiliated with the ILSFA program in a responsible manner that fosters integrity and public confidence, including responding to all public inquiries as promptly as possible but no later than seven business days. Potential participants who are judged to be non-eligible, already enrolled, or otherwise without next steps should also be notified promptly, within seven business days.

Approved Vendors are expected to adhere to the information they shared with the Program Administrator and Grassroots Education organizations, indicating which subscribers will be accepted for Community Solar projects and what standardized offers are available for distributed generation projects. Approved Vendors that are uncertain of what they can offer should specify this. Approved Vendors should promptly notify the Program Administrator if they expect delays or other capacity limits that will affect the project information previously shared with the Program Administrator. As agreed upon when becoming an Approved Vendor, information on any complaints and incidents will be provided to the Program Administrator as it becomes available. This information should include details about the complaint and participant contact information.

An Approved Vendor or Designee must report any complaints by Illinois Solar for All participants made to itself or anyone acting on its behalf to the Program Administrator. Complaints by ILSFA participants directed or conveyed to Approved Vendors should be acted upon promptly, with initial contact made within 24 hours of notice.

Approved Vendors will also provide a weekly complaint status report for all unresolved or open complaints to their Vendor Manager. This will include details on participant complaints and whether they have been resolved or are still in progress. The Approved Vendor will provide a summary of participant complaints received and resolution details in the Annual Report. The Program Administrator will use this data to consider the ongoing eligibility of an Approved Vendor to continue participation in the Program.

If participant complaints come directly to the Program Administrator, the Approved Vendor Manager will contact the Approved Vendor to discuss appropriate resolution.

As detailed in Section 9.6 of the 2026 Long-Term Plan,<sup>104</sup> the Agency maintains an ILSFA [public database of consumer complaints](#) and provides an annual written report to the ICC documenting the frequency and nature of complaints and any enforcement actions taken. View the [most recent report](#).

## 16.2. Complaint Management Best Practices

The following are best practices to ensure quick resolution and participant satisfaction.

Within 24 hours of receiving a complaint, Approved Vendors should follow up with the participant via phone call or email to confirm complaint details and inform the participant that their issue is currently being investigated. Approved Vendors should provide participants with a timeline of when they can expect a response, generally three

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<sup>53</sup> Section 7 of the 2024 Long-Term Plan applies specifically to the Adjustable Block Program, but Section 8.2.1 of the 2024 Long-Term Plan makes clear that the general terms and conditions of the 2024 Long-Term Plan's Chapter 7 will apply to ILSFA unless otherwise specified.

to five days, and whether the complaint has been resolved or the complaint is still being investigated. The goal is to resolve complaints within two weeks.

It is best practice to contact the participant at least once a week to update them on the progress of their complaint, especially in cases where it cannot be resolved within two weeks.

Approved Vendors should maintain documentation of the interactions related to the resolution of complaints. This information is required for the Annual Report or if a complaint becomes escalated.

Complaints can often arise from participant confusion, not having a full understanding of the process and the system, or not receiving responses from Approved Vendors in a timely manner. Since participants may have very little to no understanding of the concept of solar projects, it is recommended that Approved Vendors be proactive in the way they interact and communicate with them. Approved Vendors should avoid using technical jargon when possible and use examples when describing difficult concepts. Additionally, it may be useful to provide participants with guides such as the basics of solar panels, system maintenance, net metering, and billing FAQs to avoid or minimize future complaints.

## 16.3. Reporting Incidents

Any of the incidents specified in Table 16.1 below must be immediately reported in accordance with the procedures contained in this document. Notwithstanding reporting requirements, the Program Administrator's top priority is the health and safety of everyone; therefore, adherence to any procedure or reporting requirement should never override the safety, health, or well-being of anyone. If an Approved Vendor is involved in a reportable incident but cannot safely report it immediately, Approved Vendors should follow the applicable reporting protocol as soon as they are safely able to do so. When Approved Vendors are unsure of whether to report an incident, they should err on the side of caution and report it.

The following incident types have a reporting timeframe of three hours (verbally) and 24 hours (written).

- Violation of formal ILSFA requirements
- Loss or theft of personal electronic device (e.g., laptop, smartphone, tablet) containing participant's confidential information
- Breach of participant's confidential information
- Condition that draws, or may draw, negative media attention

A near miss or incidents involving damage to private or public property caused by Approved Vendors or their subcontractors/installers, including any reports of damage reported to the Approved Vendor (no injury to anyone), should be reported in 24 hours (written).

### REPORTING PROCEDURE FOR SAFETY INCIDENTS

1. When involved in a safety incident, get to a safe place as quickly and carefully as you are able.
2. If emergency assistance is needed, call 911 as soon as you are able to do so safely.
3. Once safe and emergency assistance has been called, medical care sought, or other help sought as needed, contact your Vendor Manager. If possible, have the following information available when you call:
  - Address of where the safety incident occurred
  - Names of those involved
  - What happened (factual summary of incident including injuries and/or property damaged or destroyed)
  - Response
  - Current status of the incident

## REPORTING PROCEDURE FOR STOLEN OR LOST PERSONAL ELECTRONIC DEVICE (PED) OR BREACH OF CONFIDENTIAL INFORMATION

1. If a PED is stolen, or you become aware of a breach of confidential information, immediately contact your Vendor Manager. Be prepared to report the following information to the extent you have it:
  - Type of device stolen
  - Brief summary of circumstances of theft or loss (e.g., location, time)
  - Type of confidential information on the PED or accessible via the PED
2. If a PED is stolen, contact the police for the jurisdiction where the PED was stolen and complete a stolen property report.

## REPORTING PROCEDURE FOR NEGATIVE MEDIA ATTENTION (ACTUAL OR POTENTIAL)

1. If you become aware of any condition that draws, or may draw, negative media attention, immediately contact your Vendor Manager.
2. Be prepared to report:
  - The name of the media outlet, the date, the time of broadcast, and the names of any writers, reporters, or news anchors.
  - Provide a copy of the news story link or otherwise describe what is at issue.

# 17. Confidentiality

The IPA and Program Administrator will provide confidential treatment to any commercially sensitive information submitted by Approved Vendors in connection with participation in the ILSFA program. This includes the assertion of FOIA exemptions for commercially sensitive information or for personally identifying information when applicable in response to a FOIA request and to otherwise protect the confidentiality of commercially sensitive information in response to any discovery request or other request made in connection with formal investigation or litigation. Where appropriate, Approved Vendors should designate any particularly sensitive information as confidential or proprietary to maximize the likelihood that such information would be protected from disclosure by a reviewing body (such as a reviewing court or the state's Public Access Counselor) in response to an appeal of the Agency's determination that such information should not be disclosed in response to a FOIA request.

Except where otherwise provided (such as with certain project-specific information being made publicly available through publishing project selection results), Approved Vendor submittals, including quarterly netting statements, annual reports, Approved Vendor applications, and project applications, will not be publicly posted or made publicly available as a matter of course, provided that nothing included herein shall a) prohibit the IPA from reporting information taken from Approved Vendor submittals to appropriate authorities should the IPA have reasonable suspicion of any fraudulent or otherwise illegal behavior; b) prevent the IPA from making aggregated information taken from across Approved Vendor submittals publicly available; or c) prevent the IPA from sharing information received with the ICC or public utilities to support the Program's operation.

# 18. Glossary

**Adjacent Census Tracts:** Neighboring statistical geographic area that shares a common boundary with a census tract which is, at that point in time, designated as an Environmental Justice Community or an Income-eligible Community.

**Alternating Current (AC):** An electric current that reverses its direction many times a second at regular intervals, typically used in power supplies. The standard in the U.S. is 120 reversals or 60 cycles per second. Typical U.S. household appliances use 120 volts or 240 volts. Note that for Illinois Shines (ABP) and ILSFA projects, system capacity sizes (KW) are defined as the aggregate inverter nameplate capacity in kilowatts AC (instead of system DC capacity) per 20 ILCS 3855/1-10.

**Alternative Capacity Factor (ACF):** The project application portal will automatically calculate the PVWatts estimated for initial annual system production (kWh). This initial annual production value is used in conjunction with the system capacity (KW AC) to calculate a PVWatts Capacity Factor. However, applicants can use an ACF, which may be larger than the PVWatts Capacity Factor, if it was obtained using a custom software tool or calculated by a professional engineer. Note that Approved Vendors should conduct a shading study for any project where shading of the system is anticipated. This may result in an ACF that is lower than the PVWatts Capacity Factor. Additional details can be found in Section 10 of this Approved Vendor Manual.

**Ameren Illinois (Ameren):** Ameren Illinois Company is an Investor-Owned Utility (IOU) based in Collinsville, Illinois. It is regulated by the Illinois Commerce Commission (ICC), and its service area includes approximately 75% of the state of Illinois (all but the north). Its territory is wholly encompassed by the Midcontinent Independent System Operator (MISO).

**Anchor Tenant:** Anchor tenants are entities that provide stability to a Community Solar project by agreeing to subscribe to a larger portion of the generation. Anchor tenants can be any rate-paying entity, including a non-income-eligible residential household, a business, a non-profit organization, or a public sector facility. For ILSFA, an anchor tenant is defined as any rate-paying entity that subscribes to a significant share (at least 10% but no more than 40%) of a Community Solar project. ILSFA Community Solar projects may have, at most, one anchor tenant identified at the time of project application.

**Approved Vendor:** An entity approved by the Program Administrator to submit project applications to the Illinois Solar for All program and act as counterparty to the ILSFA contracts with the utilities or the Agency. In order to qualify for ILSFA, Approved Vendors must first register with Illinois Shines (ABP) and must meet rigorous requirements, including quality workmanship, financial protections, cost and savings requirements, marketing requirements, and providing Disclosure Forms to participants. For more details on the role and requirements of Approved Vendors, refer to [www.illinoisSFA.com/vendors](http://www.illinoisSFA.com/vendors). Participant-facing communication may refer to the Approved Vendor as “solar company” or “approved solar company.”

**Area Median Income (AMI):** The area median income (AMI), as defined by the U.S. Department of Housing and Urban Development, is the household income for the median household in a region of the state. Area median income can be determined using the ILSFA [income eligibility lookup tool](#). The ILSFA Income Guidelines are found within Appendix F of the 2026 Long-Term Plan and were most recently updated in 2025. The next update is planned for 2026 and will move forward on an annual update cycle after historically being updated every five years. The formula is based on County or Metropolitan Statistical Area (MSA) and household size.

**Authority Having Jurisdiction (AHJ):** According to the National Fire Protection Association (NFPA) Standard NFPA-70 (also known as the National Electric Code (NEC)), an AHJ is defined as “an organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure.” Examples would be a fire chief, fire marshal, chief of a fire prevention bureau, labor department, health department, building official, electrical inspector, or others having statutory authority.

**Batch:** For ILSFA, the 2022 Long-Term Plan streamlined the initial submission process by eliminating the minimum batch size requirements; this change applies to the 2022-2023 Program Year and beyond. However, projects still must be “batched” in the portal as a part of the REC submission process, which helps streamline contracting.

**Carbon Dioxide Equivalent (CO<sub>2</sub>e):** The energy produced by a solar installation is converted into a measure of metric tons of carbon dioxide equivalent (CO<sub>2</sub>e), which is an estimate of the equivalent amount of carbon dioxide that would have been released into the atmosphere by a fossil fuel-fired generator producing the same amount of electricity.

**Category:** A classification based on a system size and type. There are two categories listed on the REC contracts: 1) Distributed Generation (DG), a system that is located onsite, behind a customer's meter; and 2) Community Solar, a system that is interconnected to an electric utility and allows subscribers to pay for shares or some other "interest" in the project, receiving bill credits in exchange.

**Climate and Equitable Jobs Act (CEJA):** Public Act 102-0662, as stated in Section 2.4 of the 2022 Long-Term Plan, creates a policy target for the state of Illinois of 100% clean energy by 2050; offers a decarbonization schedule for the closure of fossil-based electric generating facilities; introduces additional support for at-risk nuclear plants through the procurement of carbon mitigation credits; provides financial support for communities faced with generating facility closures; establishes significant financial support for the clean energy workforce; establishes beneficial electrification, electric vehicle, and energy storage initiatives; contains numerous ethics and ratemaking reforms applicable to Illinois electric utilities; and addresses a litany of other issues. Note that, within the Act, changes to the ILSFA program can be found at 20 ILCS 3855/1-56.

**Co-located/Co-location:** Co-location of distributed generation projects occurs when multiple projects developed by one entity or affiliated entities are located on a single parcel. Co-location of Community Solar projects occurs when multiple projects developed by the same or affiliated entities are sited on the same or contiguous parcels. Additionally, the parcel or parcels may not have been divided into multiple parcels in the five years prior to the project's application to the Program. Refer to Section 10.8 of this Approved Vendor Manual for more details.

**Commonwealth Edison Company (ComEd):** Commonwealth Edison Company is an Investor-Owned Utility (IOU) based in Chicago, Illinois. It is regulated by the Illinois Commerce Commission (ICC), and its service area includes approximately 25% of the state (all in the north), bordering Iroquois County to the south (roughly Interstate 80), the Wisconsin border to the north, the Iowa border to the west, and the Indiana border to the east. Its territory is wholly encompassed by PJM.

**Community Solar:** A solar project that (1) is interconnected to the distribution grid of an electric utility, a municipal utility, or a rural electric cooperative; and (2) allows subscribers to pay for shares or some other "interest" in the project, receiving bill credits in exchange. Community solar allows eligible participants, also called subscribers, to buy or lease a share of a single solar array located in their same utility service territory. An ILSFA Community Solar project cannot exceed 10 MW AC in size. CEJA also refers to community solar as a "photovoltaic community renewable generation project."

**Community Solar Subscriber:** A person or entity who (i) takes delivery service from an electric utility, municipal utility, or rural electric cooperative; and (ii) has a subscription of no less than 200 W to a community renewable generation project that is located in the utility's service area.

**Community Solar Subscription:** An interest in a community renewable generation project expressed in kilowatts (AC), which is sized primarily to offset part or all of the subscriber's electricity usage.

**Critical Service Provider (CSP):** A non-profit or public entity that offers critical services to Income-Eligible Communities or Environmental Justice Communities; a more comprehensive list/description is provided in Section 4.4 of this Approved Vendor Manual.

**Designees:** An entity that provides services within ILSFA on behalf of an Approved Vendor and that interacts with the end-use customer. Designees cannot enter into REC contracts with the IPA or the utility and instead must use Approved Vendors to manage their long-term REC contracts and act as the counterparty to those contracts. This

includes installers, marketing firms, lead generators, and sales organizations. Designees are largely responsible for project-specific responsibilities with their Approved Vendor(s) and do not need to be certified as an Illinois Shines Approved Vendor. The Agency reserves the right to add additional categories of market activities as needed.

**Direct Current (DC):** A type of electricity transmission and distribution by which electricity flows in one direction through the conductor (i.e., it does not oscillate or cycle like AC). Solar panels/modules generate electric power in DC.

**Distributed Generation (DG):** An electric generation system that is located onsite, behind a customer's electricity meter, and used primarily to offset a single customer's electricity demand; in the Illinois Shines and ILSFA programs, it cannot exceed 5 MW AC in size.

**Eligible Job Trainee:** An Eligible Job Trainee is a job trainee who has graduated from a Qualified Job Training Program in the last five years or a job trainee who has completed 50% of the coursework from an Other Qualifying Program in the last five years. Alternatively, a student can complete 100% of an OQP's course requirements and successfully obtain an NABCEP PV Associate Credential to become an Eligible Job Trainee for an ILSFA project. Approved Vendors and Designees are required to employ Eligible Job Trainees to meet the ILSFA job training requirements. An Eligible Job Trainee is different from an Equity Eligible Person and an Equity Eligible Contractor in the Illinois Shines program, though there may be overlap (persons that qualify as both an ILSFA job trainee and an EEP).

**Energized System:** A completed solar system that has received permission from the applicable utility to operate **and** has completed and received approval of Part II of the Program application, which includes having an irrevocable standing order for delivery of its RECs to the applicable utility buyer or IPA in either PJM-GATS or M-RETS.

**Energy Sovereignty:** Projects within ILSFA that have a defined path to majority or full ownership by income-eligible households and/or community organizations. The intent is to promote ownership and wealth-building for local people and communities. The Agency adopted the following definition of "energy sovereignty" for the Illinois Solar for All program:

*Eligible low-income household or community organization having or being on a defined path to majority or full ownership of the photovoltaic generating facility or, in the case of a cooperative or community ownership model, a share or membership in the entity that owns the photovoltaic generating facility. For the purpose of this definition, "ownership" means not only legal title to the property but also the right to participate in decisions regarding the governance, maintenance, and use of the facility and to benefit from the use of that facility. For the purpose of this definition, "photovoltaic generating facility" means any equipment that generates electricity from solar energy. If the project includes associated energy storage equipment, the eligible low-income household or community organization is not required to, but may, own such storage equipment to qualify as an "energy sovereignty" project.*

This definition and more information on Energy Sovereignty can be found in Section 8.2.4 of the 2026 Long-Term Plan.

**Environmental Justice Communities (EJCs):** Environmental Justice Communities are defined as those disproportionately exposed or vulnerable to environmental hazards and pollution. EJCs are identified through a methodology that multiplies the average of exposures and environmental effects with average socioeconomic factors. More information on EJCs can be found in Section 1.2 of this Manual. An additional [Self-Designation Process](#) is available for representatives of communities to apply to have their geographic area designated as an EJC, even if the Program's quantitative methodology did not so determine it. Visit the [Environmental Justice Communities](#) page for more information.

**Equity Eligible Contractor (EEC):** A business that is majority-owned by eligible persons, a non-profit or cooperative that is majority-governed by eligible persons, or a natural person that is an eligible person offering personal services as an independent contractor. Equity Eligible Contractor is different than an Eligible Job Trainee under ILSFA and different than a Qualified Person defined under the Ill. Adm. Code 468.20.

**Equity Eligible Person (EEP):** Persons who graduated from or are current or former participants in the Clean Jobs Workforce Network Program, the Clean Energy Contractor Incubator Program, the Illinois Climate Works Pre-apprenticeship Program, Returning Residents Clean Jobs Training Program, or the Clean Energy Primes Contractor Accelerator Program, and the solar training pipeline and multi-cultural jobs program created in paragraphs (a)(1) and (a)(3) of Section 16-108.21 of the Public Utilities Act; persons who are graduates of or currently enrolled in the foster care system; persons who were formerly incarcerated; or persons whose primary residence is in an Equity Investment Eligible Community.

**Equity Investment Eligible Community (EIEC)/Eligible Community:** An eligible community is defined as the following areas: (1) R3 Areas as established pursuant to Section 10-40 of the Cannabis Regulation and Tax Act, where residents have historically been excluded from economic opportunities, including opportunities in the energy sector; and (2) Environmental Justice Communities, as defined by the Illinois Power Agency pursuant to the Illinois Power Agency Act, but excluding racial and ethnic indicators, where residents have historically been subject to disproportionate burdens of pollution, including pollution from the energy sector.

**Future Energy Jobs Act (FEJA):** Public Act 99-0906; the Act calls for updates to Illinois' renewable portfolio standard (RPS), net metering, and energy efficiency standards, as well as a new zero emissions credits program. Note that FEJA originally established the ILSFA program and CEJA expanded and currently governs the Program.

**Greenhouse Gas:** Greenhouse gases, such as carbon dioxide, nitrous oxide, and methane, are the main causes of climate change. Developing renewable energy, including solar, reduces the emissions from conventional fossil fuel power plants, including coal and natural gas, which emit these greenhouse gases.

**Group:** One of the two Groups used to classify a system based on location. The Groups are:

- Group A: Ameren Illinois, MidAmerican Energy, Mt. Carmel, Rural Electric Cooperatives, and Municipal Utilities located in the transmission system area of MISO
- Group B: ComEd and Rural Electric Cooperatives and Municipal Utilities located in the transmission system area of PJM

**Household:** All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household.

**Housing Unit:** A house, apartment, group of rooms, or single room occupied or intended for occupancy as separate living quarters.

**Illinois Commerce Commission (ICC):** (Refer [to 220 ILCS 5](#)); the State Agency charged with regulating public utilities in Illinois, as well as approving aspects of Illinois Shines and ILSFA.

**Illinois Solar for All (ILSFA):** A Program originally administered pursuant to Section 1-56(b) of the Illinois Power Agency Act (20 ILCS 3855), as updated by Public Act 99-0906 (known as the Future Energy Jobs Act or FEJA). It was updated again as part of Public Act 102-0662 (known as the Climate and Equitable Jobs Act or CEJA) and 104-0458 (known as the Clean and Reliable Grid Affordability Act (CRGA)). ILSFA brings the benefits of solar energy and the clean energy economy to income-eligible communities and EICs across Illinois. Income-eligible households, non-profit organizations, and public entities that participate in ILSFA see significant electricity savings, and the Program features comprehensive consumer protections important to the unique needs of these communities. The ILSFA

program seeks to overcome historic barriers to developing solar for income-eligible households, such as a lack of taxable income needed to monetize tax-based incentives, a lack of access to capital, a lack of access to workforce development, and other institutional barriers that limit accessing these opportunities.

**Illinois Power Agency (IPA):** Sometimes simply referred to as the Agency (refer to 20 ILCS 3855). The State Agency charged with administering the procurement of renewable energy resources to meet Illinois' renewable energy portfolio standard, in addition to procuring electric power supply for eligible retail customers of electric utilities and other responsibilities.

**Illinois Shines:** Also known as the Adjustable Block Program (ABP), this program was established by FEJA to support the development of new photovoltaic distributed generation and community solar projects in Illinois. Illinois Shines is the state-administered incentive program supporting market-rate solar development in Illinois. Illinois Shines has close ties to ILSFA—registration and good standing as an Illinois Shines Approved Vendor are required to be eligible to participate as an ILSFA Approved Vendor. ILSFA and Illinois Shines share many program elements, such as providing incentives for solar development through REC delivery contracts, common consumer protections, and project submission processes. Residential households and non-residential entities that do not meet ILSFA qualifications may be able to participate in Illinois Shines. More information can be found on the [Illinois Shines](#) website.

**Interconnection Agreement:** An agreement with the utility to interconnect the photovoltaic community solar or distributed generation system to the utility's distribution system.

**Inverter:** A device that converts direct current (DC) electricity to alternating current (AC) either for stand-alone systems or to supply power to an electricity grid.

#### **Job Training Programs:**

- **Qualified Job Training Programs:** Qualified Job Training Programs are specific programs that have received funding through FEJA or CEJA. Approved Vendors must utilize Eligible Job Trainees from a Qualified Job Training Program or an Other Qualifying Program (OQP). The current Qualified Job Training Programs are listed on the ILSFA website under [Job Training](#). **Individuals must have graduated from a Qualified Job Training Program to be eligible.**
- **Other Qualifying Programs (OQP):** Other Qualifying Programs are job training programs that ILSFA has approved as meeting equivalent functions as the Qualified Job Training Programs. Approved Vendors can hire Eligible Job Trainees from OQPs to meet the job training requirements. A list of approved Other Qualifying Programs is available on the ILSFA website under [Job Training](#). **Individuals must have completed at least half the classroom requirements of an Other Qualified Program to be eligible.**

**Kilowatt (KW):** A standard unit of electrical power equal to 1000 watts. It is calculated by multiplying voltage x current (amps).

**Kilowatt-hour (kWh):** 1000 watts acting over a period of one hour. The kWh is a unit of energy. Electric service is usually measured by the number of kWh used by the account within the billing period.

**Income-Eligible Households:** Per the 2026 Long-Term Renewable Resources Procurement Plan and Section 1-56(b) of the IPA Act (20 ILCS 3855/1-56(b)) as amended by Public Act 104-0458, in ILSFA, "'low-income households' means persons and families whose income does not exceed 80% of area median income, adjusted for family size and revised every year."

**Income-Eligible Master-Metered Buildings:** Income-Eligible Master-Metered buildings are multifamily residential buildings who may participate in the Residential Solar (Large) sub-program or in the Community Solar sub-program as an anchor tenant and are qualified under certifications outlined in Section 6.4.2.

**Income-Eligible Communities (IECs):** Income-Eligible Communities, or IECs, are defined as census tracts that have a majority (50% or greater) of households earning 80% or less of area median income (AMI). A map and address look-up tool are available for addresses in the state for identifying these communities. For ILSFA, IECs are considered “low-income communities” per the 2026 Long-Term Renewable Resources Procurement Plan.

**Long-Term Renewable Resources Procurement Plan (Long-Term Plan):** The Long-Term Plan details IPA’s implementation of the renewable resources programs that support the Illinois RPS as laid out in the Illinois Power Agency Act. The Illinois Commerce Commission must review and approve the Long-Term Plan every two years. The ICC approved the first Long-Term Plan in 2018 and the Revised Long-Term Plan in June 2021. In response to the passing of CEJA, the IPA published a new Long-Term Plan after ICC approval in August 2022. The 2024 Long-Term Plan provided incremental updates for the 2024-2025 and 2025-2026 Program Years. The 2026 Long-Term Plan describes the implementation of Illinois Shines (ABP) (Chapter 7) and ILSFA (Chapter 8), which can be found in the 2026 Long-Term Renewable Resources Procurement Plan.

**CleanCounts (formerly known as M-RETS, the Midwest Renewable Energy Tracking System):** This is an entity that is independent of the state of Illinois, the IPA, the ABP, and ILSFA. It is one of two tracking registries that, along with PJM-GATS, can be used to track the creation, transfer, and retirement of RECs. More information can be found on the [CleanCounts website](#).

**MidAmerican:** MidAmerican Energy Company is an Investor-Owned Utility (IOU) based in Des Moines, Iowa. It is regulated by the Illinois Commerce Commission (ICC), and its service area includes almost two-thirds of Iowa, as well as portions of Illinois, South Dakota, and Nebraska. Its territory is wholly encompassed by the Midcontinent Independent System Operator (MISO).

**Midcontinent Independent System Operator (MISO), Inc.:** [MISO](#) is an [Independent System Operator](#) (ISO) and [Regional Transmission Organization](#) (RTO) providing open-access transmission service and monitoring of the high-voltage transmission system in the Midwest United States and Manitoba, Canada, as well as a southern United States region which includes much of Arkansas, Mississippi, and Louisiana.

**Minimal Shading Criteria:** In order to use the [PVWatts](#) estimated production, no obstruction can be closer than a distance (“D”) of twice the height (“H”) that it extends above the PV array. All obstructions that project above the point on the array that is closest to the obstruction shall meet this criterion for the array to be considered minimally shaded. Any obstruction located north of all points on the array need not be considered a shading obstruction. Obstructions that are subject to these criteria include:

- Any vent, chimney, architectural feature, mechanical equipment, or other obstruction that is on the roof or any other part of the building
- Any part of the neighboring terrain
- Any tree that is mature at the time of installation of the PV system
- Any tree that is planted on the building lot or neighboring lots or planned to be planted as part of landscaping for the building (the expected shading shall be based on the mature height of the tree)
- Any existing neighboring building or structure
- Any planned neighboring building or structure that is known to the applicant or building owner
- Any telephone or other utility pole that is closer than 30 feet from the nearest point of the array

**Minimum Equity Standard:** The Clean and Reliable Grid Affordability Act (CRGA), signed into law in January 2026, provides entities participating in ILSFA with a second option to meet their Portfolio Requirement, by meeting the Minimum Equity Standard. The Minimum Equity Standard (MES) is a cornerstone of the Equity Accountability System, designed to ensure a fair representation of Equity Eligible Person(s) (EEPs) and Equity Eligible Contractors (EECs) in the clean energy sector. The MES establishes a minimum percentage of the project workforce that must

consist of EEPs or EECs (defined below), fostering an inclusive workforce and promoting equity within the clean energy economy.

**Module:** Refer to the Photovoltaic (PV) module.

**Mt. Carmel:** Mt. Carmel Public Utility is an Investor-Owned Utility (IOU) based in Mt. Carmel, Illinois. It is regulated by the Illinois Commerce Commission (ICC), and it serves customers in the city of Mt. Carmel, parts of Wabash County, and residents and businesses in the Villages of Allendale, Patton, St. Francisville, Bellmont, Keensburg, and Cowling. Its territory is wholly encompassed by the Midcontinent Independent System Operator (MISO).

**Net Metering:** A provision in an electric utility's tariff that allows for crediting a customer's bill for all or some of the production of a distributed generation or community solar facility that has been exported to the distribution grid.

**Part I:** The first of two applications for a project to receive REC incentives through ILSFA. Part I requires the submission of detailed information about the PV system, its location, contractual documentation with the customer, and evidence of community engagement. If a project's Part I application is approved and there is available funding, it will receive an ICC-approved contract with one of the utility buyers or the IPA. A system must be energized within 18 months (36 months for Community Solar projects) following the approval of the contract. If a system will not be energized before the Energization deadline in the contract, the Approved Vendor must submit an extension request, or they will lose project funding and may face punitive measures.

**Part II:** The second part of the application is completed after Energization, demonstrating the completion of the project in accordance with the approved Part I parameters.

**Participant:** The person, household, or non-profit or public facility entity qualified as the end-use customer and beneficiary of an ILSFA PV system. Qualification for households stipulates that income does not exceed 80% of the area median income (AMI), adjusted for family size and location and revised every year. The next update is planned for 2026 following Public Act 103-1066 which directed Income Guidelines revisions to occur on an annual, rather than five-year, cycle. Non-profit and public facilities are qualified on the basis of their geographic location in Environmental Justice Communities (EJCs), Income-Eligible Communities (IECs), or adjacent census tracts and their classification as Critical Service Providers.

**Participant Savings Requirements:** Participants must receive at least 50% of the value generated by the participant's share of the PV system as savings, as calculated without a household's low-income discount rate. If the project participates in the Non-Profit and Public Facilities sub-program and applies for a federal Investment Tax Credit (ITC), then the savings must be at least 65%. See Section 5 of this Approved Vendor Manual for more information on participant savings requirements in ILSFA.

**Photovoltaic (PV):** Pertaining to the direct conversion of light into electricity.

**Photovoltaic (PV) Array:** An interconnected system of PV Modules that function as a single electricity-producing unit. The modules are assembled as a discrete structure with common support or mounting.

**Photovoltaic (PV) Cell:** The smallest semiconductor element within a PV module to perform the immediate conversion of light into electrical energy. Also referred to as a solar cell.

**Photovoltaic (PV) Module:** The smallest environmentally protected, essentially planar assembly of solar cells and ancillary parts, such as interconnections, terminals, and protective devices such as diodes intended to generate direct current power under unconcentrated sunlight. The structural (load-carrying) member of a module can either be the top layer (superstrate) or the back layer (substrate). This term is often used interchangeably with solar panels.

**PJM Interconnection LLC:** PJM is a [regional transmission organization](#) (RTO) in the U.S. It is part of the [Eastern Interconnection](#) grid operating an electric transmission system serving all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. ComEd is part of PJM.

**PJM-GATS:** The PJM Environmental Information Service Generation Attribute Tracking System. This is an entity that is independent of the state of Illinois, the IPA, the ABP, and ILSFA. It is one of two tracking registries, which, along with CleanCounts (formerly M-RETS), can be used to track the creation, transfer, and retirement of RECs. More information can be found on the [PJM-GATS website](#).

**Prevailing Wage:** A minimum compensation level set by the Illinois Department of Labor by county for construction activities related to public works. Section 1-56(b-15) of the IPA Act (20 ILCS 3855) requires that individuals engaged in the construction of applicable projects submitted to ILSFA are paid the relevant prevailing wage. See Section 15.7 of this Approved Vendor Manual for more information on prevailing wage requirements in ILSFA.

**Program Administrator:** The IPA's consultant who is responsible for running the day-to-day operations of the Illinois Shines (ABP) and ILSFA programs.

- Elevate is the current Program Administrator for the ILSFA program.
- Energy Solutions is the current Program Administrator for Illinois Shines (prior to 2022, it was InClimate).

**Program Year:** Starting no earlier than June 1 of a calendar year and ending no later than May 31 of the following calendar year, the Program Year is the period during which an Approved Vendor may submit applications for project funding to the ILSFA program. Sub-program project application windows (the period during which applications are received and reviewed) vary slightly from one Program Year to another and are contingent upon key Program milestones such as budget availability, finalization of revisions to the Long-Term Renewable Resources Procurement Plan, stakeholder comment periods, ILSFA program documentation development, and other items. The ILSFA Program Administrator posts the dates of all project application windows on the ILSFA website.

**Project:** A solar photovoltaic array and all associated equipment necessary for its generation of electricity and connection to the distribution grid (same as "System").

**Project Labor Agreement:** A pre-hire collective bargaining that covers all terms and conditions of employment on a specific construction project. Sections 1-75(c)(1)(Q)(2) & 1-75(c)(1)(T) of the IPA Act (20 ILCS 3855) as modified by the Clean and Reliable Grid Affordability Act (Public Act 104-0458) requires that Community Solar projects where the aggregate capacity, including co-located projects, exceeds 3 MW pursuant to a REC contract approved by the Illinois Commerce Commission under the ILSFA program must enter into a project labor agreement, as defined by the IPA Act, prior to construction.

**Project Selection Protocol:** Initiated if the incentive value of eligible projects submitted in an ILSFA sub-program is more than that sub-program's budget. Details can be found in the [ILSFA Project Selection Protocol Guidance Document](#).

**PVWatts:** PVWatts is an online calculator developed by the National Renewable Energy Laboratory (NREL) that estimates the energy production of photovoltaic (PV) energy systems. It allows users to easily develop estimates of the performance of potential PV installations. PVWatts is used by the Program Administrator to evaluate the Alternative Capacity Factor (ACF) for projects submitted in the Vendor Portal. For information, visit [the PVWatts website](#).

**Qualified Person:** “Qualified person” means a person who performs installations on behalf of the certificate holder and who has either satisfactorily completed at least five installations of a specific distributed generation technology or has completed at least one of the following programs requiring lab or field work and received a certification of satisfactory completion: an apprenticeship as a journeyman electrician from a DOL registered electrical apprenticeship and training program; a North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program; an Underwriters Laboratories (UL) distributed generation technology certification program; an Electronics Technicians Association (ETA) distributed generation technology certification program; or an Associate in Applied Science degree from an Illinois Community College Board approved community college program in the appropriate distributed generation technology. To be considered a “qualified person,” the experience and/or training relied upon must be with the same type of distributed generation technology for which the qualification status is sought. See Section 15.2 of this Approved Vendor Manual and [Part 468](#) of the ICC’s rules (83 Ill. Adm. Code § 461, 468) for more information.

**REC Delivery Contract or REC Contract:** Agreement between an Approved Vendor and a utility counterparty (i.e., Ameren Illinois, ComEd, or MidAmerican) or the IPA for the delivery of, and payment for, RECs from ILSFA projects for a 15-year term. For ILSFA, refer to Section 11.2 of this Approved Vendor Manual for REC delivery contract details.

**Renewable Energy Credit (REC):** Represents the environmental benefit of 1 MWh of electricity generated by a renewable energy generator. As part of the ILSFA program, Approved Vendors receive incentives through the selling of RECs generated by participating solar projects.

Note that the REC Price Schedule Table System Size (kW) is measured in AC at the inverter.

**Renewable Energy Resources Fund (RERF):** One of two sources of funding for ILSFA projects (the other is utility-held funds collected from the Renewable Portfolio Standard (RPS) riders). Held by the state of Illinois, the RERF was originally funded by Alternative Retail Energy Suppliers through Alternative Compliance Payments.

**Renewable Portfolio Standard (RPS):** A law that requires a certain portion of the electricity served by investor-owned utilities in a state to come from renewable generation.

**Single Project Approved Vendors:** An entity that only seeks certification as an Approved Vendor for a single project and must meet a revised set of requirements to participate in ILSFA, including being the registered owner of the system and having a minimum system capacity of 50 kW.

**Small and Emerging Business (SEB):** Any for-profit entity, independently owned and operated, that grosses less than \$4 million per year and/or business that has been authorized to do business in any U.S. state for less than three years.

**Small Subscriber:** A residential or small commercial customer with a subscription below 25 KW.

Eligible small commercial rate classes for the investor-owned utilities are:

- Commonwealth Edison: “watt-hour delivery class” and “small load delivery class”
- Ameren Illinois: “DS-2”
- MidAmerican Energy: “GE,” “GD,” “GET,” “GDT,” “GER,” and “GDR”

Note that this classification was used prior to the 2022-2023 Program Year as an adder for ILSFA Community Solar projects.

**Standard Test Conditions (STC):** The solar irradiation of one kilowatt (KW) per square meter, a module temperature of 25 degrees Celsius, and an air mass of 1.5.

**Subcontractor:** An entity that may be used for any non-Approved Vendor role that does not have direct interaction with the end-use customer. A subcontractor does not have access to the Approved Vendor Portal and thus cannot submit project applications. See Section 3 of this Approved Vendor Manual for more information.

**System:** A solar photovoltaic array and all associated equipment necessary for its generation of electricity and connection to the distribution grid (same as “Project”).

**Utility Territory:** A utility territory is the geographical area where a utility (for example, Ameren Illinois or ComEd) delivers energy. You must live in the same utility territory as the Community Solar project to become a subscriber. Note that in Illinois, there are four electric utilities (Ameren Illinois, ComEd, MidAmerican, and Mt. Carmel). In addition, there are also Cooperatives (co-ops) and Municipalities (munis) that provide electricity more locally.

## 19. Approved Vendor Manual Updates

Information in this Approved Vendor Manual is subject to change without prior notice. To obtain the latest version of this Manual, visit the [Resource Library](#) on the ILSFA website.

The Manual will be updated both as the Program changes and as additional questions and issues arise. The IPA will make updates to the Manual in consultation with the Program Administrator. Such changes will be announced on the ILSFA website under [Announcements](#); the version of the Manual published on the website will always be the latest.

Changes to Manual versions will be redlined and indicated by alternate version numbering. A summary of changes will be provided in the appendix with any subsequent version as well.

# 20. Appendix

## 20.1. Approved Vendor Manual Updates

### 20.1.1 SIGNIFICANT REVISIONS:

#### 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 EJs.
- 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 status of the ILSFA partnership with the NCSP+ Energy Connector (previously known as the Clean Energy Connector).
- Added information on the plan to create a LIHEAP referral process for Community Solar projects.
- 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 Long-Term 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 that 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 Long-Term 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 11**

- Updated information related to planned 2026 REC contract changes including relief for abandoned contracts and interconnection denials.

## **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 toward 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 five years. Included an additional five-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.