



ILLINOIS POWER AGENCY

Request for Information

REC Rollover and Redistribution Methodology for Indexed REC Procurements

August 14th, 2026

Background

Under the [2026 Long-Term Plan](#) (“the Plan”), the Illinois Power Agency (“the Agency”) through its Procurement Administrator NERA Economic Consulting, Inc., is scheduled to conduct four competitive procurement events for utility-scale renewable energy credits (RECs) across calendar years 2026 and 2027, one event each as follows: Summer 2026 (completed in June 2026), Fall 2026, Summer 2027, and Fall 2027. Each procurement event will target the annual REC procurement quantities presented in the table below:

Procurement Targets for Upcoming Competitive Procurement Events from the 2026 Long-Term Plan¹

Procurement	Technology	Procurement Date	REC Target
Wind/Hydro Forward Procurement	Wind (utility-scale), Hydropower	Summer 2026	2,500,000
Solar Forward Procurement	Photovoltaic (utility-scale)	Summer 2026	1,300,000
Brownfield Site Photovoltaic	Photovoltaic (Brownfield)	Summer 2026	90,000
Wind/Hydro Forward Procurement	Wind (utility-scale), Hydropower	Fall 2026	833,333
Solar Forward Procurement	Photovoltaic (utility-scale)	Fall 2026	433,333
Brownfield Site Photovoltaic	Photovoltaic (Brownfield)	Fall 2026	30,000
Wind/Hydro Forward Procurement	Wind (utility-scale), Hydropower	Summer 2027	833,333
Solar Forward Procurement	Photovoltaic (utility-scale)	Summer 2027	433,333
Brownfield Site Photovoltaic	Photovoltaic (Brownfield)	Summer 2027	30,000
Wind/Hydro Forward Procurement	Wind (utility-scale), Hydropower	Fall 2027	833,333
Solar Forward Procurement	Photovoltaic (utility-scale)	Fall 2027	433,333
Brownfield Site Photovoltaic	Photovoltaic (Brownfield)	Fall 2027	30,000

In addition to these base procurement quantities, the Agency has two mechanisms at its disposal (discussed in Section 5.6 of the Plan) to reallocate unfulfilled REC quantities and maximize the number of RECs procured in each competitive procurement event.

The first mechanism is to “roll over” unfulfilled REC procurement quantities from a given technology to the same technology in subsequent procurement events. As explained in the Plan, the Agency may roll over unallocated utility-scale wind and hydropower, utility-scale solar, and brownfield site photovoltaic project REC targets and increase the size of REC procurement targets at *subsequent* procurement events to meet previously unfulfilled targets.

The second mechanism was approved by the Illinois Commerce Commission (“the ICC”) in the reopening of the 2024 Long-Term Plan and allows the Agency to select bids to fulfill any unfilled targets in the *same* procurement event, regardless of product (technology) type. If the quantity of RECs procured through the competitive procurement is lower than the quantity sought for that technology in that procurement,

¹ This table appears on page 155 of the 2026 Long-Term Plan as *Table 5-5: Proposed Procurement Targets for Upcoming Competitive Procurement Events From the 2026 Long-Term Plan*.

regardless of the reason that the quantity is unfilled, the Agency will shift the procurement target from the under-subscribed technology to the over-subscribed technology(ies) in that same procurement event. For example, as explained in the Plan, if the procurement event has a target of 700,000 RECs from wind projects and no wind project is selected, then the Agency could redistribute the 700,000 unallocated RECs to other bids which exceed the target for another technology (such as utility-scale solar bids or brownfield solar bids) and which cleared the applicable benchmark for that technology in the same procurement event. For clarity, this document will refer to this mechanism as “dynamic redistribution” of RECs.

The Agency seeks stakeholder feedback regarding the use of these mechanisms to reallocate unfulfilled REC quantities in advance of the Fall 2026 Indexed Wind/Hydropower, Solar and Brownfield REC RFP. Specific questions for which responses are sought are found below, but commenters need not respond to every question and should not feel limited by the questions in providing feedback. Comments are welcome from any interested parties. Responses will help inform the Agency’s next steps.

Responses are due by September 4th, 2026, and should be sent to Illinois-RFP@nera.com.

In general, responses will be made public and published on the Procurement Administrator’s website (www.ipa-energyrfp.com). The Agency will protect any confidential information submitted in a response pursuant to the provisions of Section 7 of the Illinois Freedom of Information Act (5 ILCS 140/et. seq.). Commenters submitting confidential information **must** specify which portion of their response contains confidential, proprietary, or commercially sensitive information that, if disclosed, would cause competitive harm, and provide a redacted version for the Agency’s public posting. In the event that the IPA or its Procurement Administrator determines a response contains confidential information that may not be disclosed (for example, non-public information related to a competitive procurement event), the Agency may redact a response prior to posting.

Please direct any questions or requests for additional information to the Procurement Administrator at: Illinois-RFP@nera.com.

Topic 1: Dynamic Redistribution

Please answer the following questions based on the above explanation of “dynamic redistribution” of RECs, also discussed in Section 5.6 of the [Plan](#).

1. Describe any advantages and disadvantages of dynamically redistributing unfulfilled RECs across technology categories within the same procurement event, as opposed to rolling over unfulfilled RECs to the same technology category in a future procurement event. Responses may delineate by technology if necessary. Please provide examples or scenarios that help explain advantages or disadvantages.
2. Dynamic redistribution of RECs within a procurement event and rolling over RECs from one procurement event to the next are not mutually exclusive. For example, if a procurement event has 500,000 unfilled RECs from an undersubscribed category, the Agency could potentially dynamically redistribute 250,000 RECs to additional bids that cleared the benchmark in an oversubscribed category and roll over the remaining 250,000 RECs to the undersubscribed category in the subsequent procurement. If dynamic redistribution of RECs is utilized in the Fall 2026 procurement event, should a certain quantity or percentage of RECs be “held back” to be rolled over to the same technology category in the subsequent procurement? Please explain.

Topic 2: Brownfield Carve-out

The following questions are targeted towards stakeholders involved in the development or other aspects of brownfield site photovoltaic projects. Please keep in mind that the Fall 2026, Summer 2027, and Fall 2027 procurement events will all feature initial procurement targets of *at least 30,000* annual RECs from brownfield projects as defined in the Plan, regardless of any reallocation of unfulfilled RECs.

1. Target REC procurement quantities for brownfield site photovoltaic projects have not been consistently met in the Agency’s competitive procurement events. Under the 2026 Long-Term Plan, if there are unfulfilled RECs in the brownfield photovoltaic category in the Fall 2026 procurement event and oversubscription in other technology categories, the Agency could dynamically redistribute these unallocated RECs to bids from other technologies that clear the benchmark in the same procurement event, regardless of technology type. Do you support this approach? Please provide an explanation for why brownfield site photovoltaic RECs should or should not be dynamically redistributed.
2. Similar to Topic 1 Question 2 – dynamic redistribution of RECs within a procurement event and rolling over RECs from one procurement event to the next are not mutually exclusive for brownfield site photovoltaic projects. Are there any other provisions or considerations the Agency should consider for brownfield site photovoltaic that differ from other technologies (wind or utility-scale solar) per your response to Topic 1 Question 2 above? Specifically:
 - a. Should (i) all unsubscribed RECs for brownfield site photovoltaic be dynamically redistributed to other oversubscribed technologies in a procurement event, (ii) only a percentage of unsubscribed RECs be dynamically redistributed, or (iii) all unsubscribed RECs be rolled over to brownfield site photovoltaic in the next procurement event? Please provide detailed explanations for your response.
 - b. What are the advantages and disadvantages of dynamically redistributing a portion of unallocated brownfield RECs and rolling over another portion to the subsequent procurement?

3. The Agency is interested in learning about brownfield site photovoltaic projects that are in development or in the planning phase (not developed but under consideration) and that may bid into a future IPA Indexed REC procurement event. If many such projects are in development, IPA may find it prudent to maintain a larger brownfield site photovoltaic target. Please submit any available information that could provide the Agency with additional insights into potential brownfield site photovoltaic development leading to participation in the IPA's Indexed REC procurement events in 2026 or 2027.
4. Are there any barriers to developing brownfield site photovoltaic projects that may improve or worsen in the future? To what extent has the availability of a scoring preference within the Traditional Community Solar category of the IPA-administered Illinois Shines Program instead made Illinois Shines more attractive for brownfield site photovoltaic projects that might otherwise take advantage of Indexed REC procurement quantities? Please explain.