



February 28, 2020

Illinois Power Agency  
105 West Madison Street, Suite 1401  
Chicago, IL 60602

RE: Comments on Draft 2022 Long-Term Renewable Resources Procurement Plan

The Illinois Farm Bureau (IFB) appreciates the opportunity to comment on the Illinois Power Agency's (IPA) draft 2022 Long-Term Renewable Resources Procurement Plan. IFB is the state's largest general farm organization representing three out of every four Illinois farmers. Because many renewable energy projects are constructed on farmland or rural properties, the development of renewable energy projects can create significant impacts for Illinois farmers.

Section 7.4.3 of the draft 2022 Long-Term Plan specifically requests feedback on appropriate agriculturally sensitive provisions that could be used in the scoring process for prioritizing Traditional Community Solar projects if applications exceed block capacity. IFB policy, established through a grassroots, member driven process supports "efforts to locate solar energy projects on marginal or underused lands, including brownfield sites, highway rights-of-way, exit ramps, rest areas, welcome centers, embankments, and on IDNR non-tillable properties rather than highly productive, tillable farmland<sup>1</sup>." Based on this policy, IFB suggests that projects providing documentation that land where the project will be installed is not highly productive and not currently used for agricultural production receive additional points in the scoring process for committing to agriculturally-sensitive provisions. This would encourage projects that utilize less productive land and minimize impacts to agriculture.

In Section 7.5.5 of the draft 2022 Long-Term Plan, the IPA asks for feedback regarding criteria for evaluating whether separate systems located on the same parcel serve separate residential and agricultural uses. As is stated in the plan, it is possible that farmers may own separate systems located on the same parcel that serve different agricultural and residential loads. An owner of a parcel that can document the expected load needed to serve an agricultural use (i.e., agricultural buildings and sheds, grain handling and grain bins, livestock barns, etc.) and the load needed for

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<sup>1</sup> 2022 Policy Resolutions. Illinois Farm Bureau



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residential use should be able to have systems serving each load treated separately and not combined for purposes of determining project size.

Thank you for your consideration of these comments. Please do not hesitate to contact me should you have any further questions.

Regards,

A handwritten signature in black ink, appearing to read "Bill Bodine". The signature is stylized with a large, looped "B" and "D".

Bill Bodine  
Dir. of Business and Regulatory Affairs  
Illinois Farm Bureau