

LIGHTSTAR RENEWABLES AND AMERICAN FARMLAND TRUST'S JOINT COMMENTS ON THE DRAFT LONG-TERM RENEWABLE ENERGY RESOURCES PROCUREMENT PLAN

Lightstar Renewables (Lightstar) and American Farmland Trust (AFT) greatly appreciate the opportunity to comment on the 2024 Draft Long-Term Plan. As a member of the Coalition for Community Solar Access (CCSA), Lightstar separately endorses CCSA's comments submitted, with these as a supplement. We are a community solar developer and Approved Vendor in Illinois with sites under development in Illinois, many of which are agrivoltaics (AgPV) sites. We would also like to thank you for your clarification relating to agrivoltaics and the pollinator scorecard pesticide issue and are currently working with stakeholders to reach consensus around necessary changes to the scorecard. We are happy to provide more information on that as well.

In past program iterations, the IPA has seen fit to incentivize agrivoltaics in the form of a point in the project scoring criteria, which allows high scoring projects to be awarded capacity and to access the waitlist. We appreciate the IPA's positive position on agrivoltaics as a policy mechanism which is intended to further projects that align with the IPA's priorities. In order to properly prioritize agrivoltaics projects, the Joint Commenters urge the IPA to increase points to two.

American Farmland Trust's 2040 Farms Under Threat publication estimates that Illinois will be among the top 3 states to lose the most farmland, with 134,800 acres of cropland lost. Combined with the IPA's goal of 666MWs of solar deployed in the next two years, there is a significant need to further incentivize projects that keep Illinois prime farmland in agricultural production. The combination of a MW goal and farmland loss poses a significant risk to food security, rural vitality, and to solar developers and policymakers who cause unintended harm to farms and livelihoods across the state. Agrivoltaics is a solution that allows us to meet the state's renewable energy goals, while keeping farmland in production.

While one point is sufficient to incentivize developers to consider some agrivoltaics projects, it remains that many agrivoltaics projects are languishing on waiting lists while farmland is developed for solar due to other points categories. Projects that are most likely to have a viable interconnection pathway are in less congested, rural areas and are more likely to be sited on productive farmland. Projects with the top two positions on a substation are eligible to receive two points. Agrivoltaics should be akin to other preferred siting categories that receive two points such as disturbed land (rooftop) or brownfields since there will be value added to the AgPV sites such as: frost protection, decrease in water usage, crop yield increase, and fencing to keep wildlife away from crops. AgPV projects are treated as preferred siting categories the same as rooftops and brownfields in the following state community solar programs: Massachusetts, Maine, New Jersey, and Maryland. California and New York are likely to follow suit.

It is the Joint Commenter's view that in order to accurately incent projects to prevent significant farmland loss, another point for agrivoltaics is needed in the project scoring criteria. Elevating agrivoltaics to two points is critical at this time since there is a rise in county push back despite the enactment of HB 4412. Thank you for your consideration of our comments.

LIGHTSTAR



Best,

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