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Sent: Friday, September 29, 2023 4:13 PM
To: IPA.ContactUs <IPA.ContactUs@Illinois.gov>
Cc: Jennifer Mrzlack <jmrzlack@psenergygroup.com>
Subject: [External] Comment for Draft 2024 Long-Term Renewable Resources Procurement Plan

Hello,

We would like to submit the following comment for the 2024 Draft Long-Term Renewable Plan:

Section 8.5.6.1 of the Long-Term Plan states that: “Because Public Act 102-0662 established a category in Illinois Shines specifically to serve public schools, the Agency has ceased considering public schools as eligible for the Non-profit/Public Facilities sub-program after the 20223-2023 program year”

We strongly believe that this is a detrimental decision and acts in direct opposition to the program’s objective “to bring photovoltaics to low-income communities”. Although the Public Schools subcategory in Illinois Shines prevents public schools from competing against other DG projects, school districts in affluent communities are now competing directly for the same funding as school districts in low-income communities. Furthermore, the incentive value offered is roughly 50% less than Illinois Solar for All, meaning new solar projects tend to go more easily towards districts who were already in stronger financial positions. Our company has seen this impact first-hand, when we submitted 6 low-income school projects that were not taken off the waitlist prior to the final window of Illinois Solar for All, earlier this year. In the months that followed, we have been working with the district and third-party financing partners to try to find different avenues to fund these projects. Even with the income generated from the Public Schools Subprogram, we have not found a suitable way to fund these projects. To reiterate, as a direct result of this change, 6 public schools in low-income communities may not be able to afford solar.

Public Schools meet both the standards described in section 8.9, referring to “connection to, and input from, income-eligible community members”, as well as standing in as a “critical service provider”. Because school districts are led by publicly elected officials, and many board meetings are open to the public, public schools are constantly in connection with the communities they serve. Moreso than a private non-profit, the local community has direct input and control over the leadership and direction of a school board. As such, in many communities, Public Schools act as the primary community center, and as a reliable institution, going far beyond the classroom. During the COVID-19 pandemic, at the same time we were installing rooftop solar on a public school through the Illinois Solar for All Program, just below, the school was busy distributing free meals for hundreds of families that were impacted by the pandemic. Although that service has since ended, the solar that was installed can now be used to free-up funds for the district to reinvest in other, similar, community beneficial activities. This is only one example; however, we have seen countless examples of schools acting as emergency shelters, childcare centers, community gathering locations, and many other critical functions. In areas that lack outside resources, the local public school district is an entity that can step in to provide support for the community and expect nothing in return.

In summary we recommend, re-instating eligibility for public schools, as long as they otherwise meet the Illinois Solar for All criteria. In recognition that funding is limited and there are many customer segments to consider, an alternative suggestion is creating a new subprogram in the Illinois Solar for All program, that acts similarly to the Illinois Shines category. By doing so, higher REC values could be set-aside for

public schools with the highest needs, while still reserving other funding for non-profit/public facilities. Public Schools that do not qualify for Illinois Solar for All could then still apply to the Illinois Shines program.

We sincerely hope that you consider this change to the program, and we appreciate the opportunity to voice our comment.

Thank you

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