

Illinois Power Agency  
180 N Wabash Ave Suite 500  
Chicago, IL 60601

September 29, 2025

**RE:** Public comment from Lightstar Renewables, LLC on the draft 2026 Long-Term Plan

To the Illinois Power Agency:

Thank you for the opportunity to provide public comment on the draft 2026 Long Term Renewable Resources Procurement Plan (2026 Long Term Plan) released on August 18, 2025. Overall, Lightstar Renewables, LLC (Lightstar) is supportive of the proposed changes, particularly to those focused on the Illinois Shines Program.

Specifically, Lightstar would like to register its support for the following aspects of the 2026 Long-Term Plan draft:

- Under Sec. 7.4.3.1 "Traditional Community Solar Scoring Guidelines," Lightstar supports Item (1)(d), the increased point value from 1-2 points for a commitment to utilize agrivoltaics or dual-use solar. Lightstar is a community solar developer with a demonstrated commitment to agrivoltaics projects and we feel increasing the points value for these projects sends a strong signal to maximize the use of land for both clean energy and agricultural production.
- Also under Sec. 7.4.3.1 "Traditional Community Solar Scoring Guidelines," Lightstar supports Item (2)(c), which expands the ability for Traditional Community Solar (TCS) projects to qualify for points based on county and/or township siting by increasing the project limit from one (1) to five (5). Lightstar feels this modification will enable the balanced buildout of community solar projects across the state in-line with Agency goals.

Lightstar would also like to take the opportunity to raise concern with following proposed modification:

- Under Sec. 7.4.3.1 "Traditional Community Solar Scoring Guidelines," Lightstar does not support the addition of Item (1)(f), which would subtract 2 points from projects sited on a greenfield that are not sited on contaminated land and do not utilize agrivoltaics, dual use, or pollinator friendly habitat. While we are a community solar developer with a robust pipeline of agrivoltaic projects, we also recognize that not every landowner and/or farmer wishes to commit to agrivoltaics. We do not feel that it is in the interest of the state's aggressive clean energy buildout goals to penalize landowners and farmers that want to install solar on their land by implementing this subtractor.

Again, thank you for the opportunity to share our comments and contribute to the drafting and finalization of the 2026 Long Term Plan.

A handwritten signature in black ink that reads "Lauren Skirball". The script is fluid and cursive, with the first name "Lauren" and last name "Skirball" clearly distinguishable.

Lauren Skirball

Policy Manager

Lightstar Renewables

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