



June 6, 2025

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

RE: Illinois Farm Bureau – Chapter 5 LTP Feedback

The Illinois Farm Bureau (IFB) appreciates the opportunity to provide feedback on Chapter 5 of the Illinois Power Agency's (IPA) Long-Term Renewable Resources Procurement Plan. IFB is the state's largest general farm organization representing over 70,000 Illinois farmers. Because many renewable energy projects are constructed on farmland or rural properties, the development of renewable energy projects has significant impacts for Illinois farmers.

The Stakeholder Feedback Request for Chapter 5, Topic 5 seeks input on improving participation in competitive procurements for brownfield site photovoltaic projects. IFB does not have expertise in the design of REC programs that would improve program participation. However, IFB policy, established through a grassroots member driven process, supports efforts to locate renewable energy projects on marginal or underused lands like brownfields and other non-tillable properties rather than highly productive farmland. As renewable energy project development increases in Illinois and more farmland is removed from agricultural production, our members continue to encourage projects be constructed on brownfields and other types on non-tillable properties.

Based on IFB's policy regarding efforts to locate renewable energy projects on brownfields, our organization suggests that the IPA thoroughly explore alternative approaches that could improve participation in the program. IFB would support changes that would allow the IPA to procure RECs in amounts sufficient to meet or exceed the targets for brownfield site photovoltaic projects. Our organization also stands ready to assist with addressing barriers that project developers highlight as undermining the development of brownfield photovoltaic projects.

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

Regards,

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



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