

**Stakeholder Feedback Request for the 2024 IPA Long-Term Plan**

**Chapter 7: Illinois Shines (Adjustable Block Program)**

**Respondee: ForeFront Power**

**June 29<sup>th</sup>, 2023**

**TOPIC 6: Public Schools Category Uptake**

ForeFront Power is generally in agreement and supportive of the comments submitted by the Joint Solar Parties regarding Chapter 7 of the Long-Term Plan. ForeFront Power has decided to submit additional comments specifically with regard to the public schools category and ideas to advance the goal of the IPA to increase uptake in this category in this program year and future ones.

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Regarding the subscription requirement for public schools community solar projects, ForeFront Power has some suggestions for the IPA to consider. Currently, a public school must subscribe to a minimum of 10% of the project located on the land they own. The existing waiver process on this requirement only allows for it to apply after the project has been operational. However, if a project will require such a waiver to secure and maintain its incentives, that project could not be built until the waiver is granted and provides economic certainty for the project. ForeFront Power appreciates the necessity of allowing the school district that owns the land to benefit first from the project; however, there are certain situations where this could be a limiting factor on the total benefits delivered to the district:

- For small, rural school districts who own a significant amount of land (e.g., 30+ acres), 10% of a project's generation may be higher than the district's load.
- Many larger school districts also own land that could work for community solar but have already implemented behind-the-meter solar at several sites. Thus, their resulting electricity load and bill payments to the utility are very small.

In both cases above, under the current rules, the school district could be forced to downsize the community solar project so they can meet the 10% minimum subscription requirement, thus reducing their all-in lease payments from the approved vendor and the total financial benefit they receive. Alternatively, they could be disincentivized to simultaneously pursue behind-the-meter and community solar, which is in direct opposition of the goal of the public schools block to increase all types of solar at public schools across Illinois. Therefore, in lieu of a hard minimum of 10% subscription by the public school, the IPA could allow all the following options to meet the subscription requirement at time of part 1 application:

- The public school could provide a letter stating they do not have remaining sufficient load or bill payments to the utility to subscribe to the minimum 10% of the project. Thus, they are

subscribing to anywhere from 0% to 10% of the project but will benefit from the project in other ways, such as lease payments from the approved vendor on the project.

- The approved vendor could provide evidence of a high offset (e.g., at least 80%) of one school district utility account. Even if this does not meet the 10% output of the overall project, this can meet the subscription requirement.
- The approved vendor could provide evidence that a different school district in the same utility region will subscribe to the minimum 10% of the project output so the subscription benefits are still going to a public school, even if it is not the same school that owns the land on which the project is located.

ForeFront Power believes the above changes and considerations will increase the uptake of submissions to the public schools block and remove barriers to participation for smaller districts or districts that have already installed behind-the-meter solar projects.