

July 29, 2023

To whom it may concern,

I submit these comments on behalf of the non-profit IEC Powered by Future Green (IECFG) which is the largest school energy consortium in Illinois, representing 235 school districts. The entity was created by the Illinois Association of School Administrators, the Illinois Association of School Boards, and the Illinois School Business Officials and has been working for over 20 years to provide the most affordable and reliable energy to Illinois schools.

It is important to note the IECFG set out to ensure there were RECs dedicated to public schools in CEJA. The reasons for this were twofold. One, school districts are intentionally deliberative public bodies. In the best interest of the public, they take time to make decisions and to spend money on those decisions. Because of this, they will be taking time to make decisions on solar installations. Two, the push for dedicated RECs was also made because by the time these deliberative bodies were ready to take advantage of RECs under the previous program, there were none left as they were all taken up by private entities. Dedicated RECs are necessary to ensure public schools, and the public they serve, can most benefit from available renewable energy solutions.

With regard to Section 6 of the IPA Stakeholder Feedback Request for the 2024 Long Term plan, we have identified four basic reasons why development and progress in the utilization of RECs for public schools has been slow. In addition, we offer some thoughts on solutions.

In there are four major impediments to renewable energy development and thus significant usage of the RECs set aside for public schools in Illinois.

- **Administrative process at the school district level** - It takes a long time for developers to educate Superintendents, Chief School Business Officials and others on all the benefits of renewable energy projects. This is true even if developers simplify the myriad of product offerings by narrowing it down to just solar array installation. Most administrators are not experts in the energy industry and even once they are educated, it takes additional time for them to get other stakeholders on board. Once this happens, school boards must be convinced, and it may take multiple public meetings for them to vote to approve these projects.
- **Conflicts and confusion due to additional state and federal incentives** - When we get the subset of school districts that are innovative thinkers and early adopters on board and slated for solar development, the process gets impeded by the introductions of additional state/federal incentives that give school districts pause or sends them back to the drawing board. The breakneck speed with which policies and incentives are being pushed out to spur renewable energy development can be overwhelming and stifling to growth. While we do our best to educate public schools on all their options and put them in a position to capitalize, many times their heads are left spinning and they need time to digest the information.

They must also take into account all the incentives for electric school buses and charging infrastructure. A school district that was once only thinking about a solar array is now pondering how to add fleet electrification, battery storage and additional solar to cover the other components.

Consider the tight timelines of when legislation has been passed and how the incentives affect public schools:

- September 15, 2021 - Climate & Equitable Jobs Act signed into law (REC carve out granted to IL public schools)
- August 16, 2022 - Inflation Reduction Act signed into law, less than a year later. This legislation introduced a 30% direct payment option to school districts and an additional 10% for coal impacted communities. This hampers development because now school districts that were content to build under a PPA are now considering the drawback and benefits to owning their own projects
- August 19, 2022 – Environmental Protection Agency (EPA) Clean School Bus Grant Program – Round 1 application due. Payment request forms were due April 28, 2023. Funds have still not been released to many of these winners and not only has it increased engineering and design work but many of these districts are waiting to start their solar construction until they get their buses. Or they need to go back to the drawing board and increase their solar arrays to cover the addition of new electric buses
- April 21, 2023 – Department of Energy (DOE) Renew America’s Schools Grant application deadline. We applied for funding for 20 IL public schools to build microgrids which includes the installation of solar, stationary storage, at least one electric school bus and V2G charger. Funding is not slated to be released until January 1, 2024. Other school districts in the state outside our portfolio have also applied for this funding. School districts are waiting to see if they get funding before they know how to proceed with building their renewable energy solutions.
- June 13, 2023 – US Department of Transportation (DOT) Charging and Fueling Infrastructure Community Grant application deadline. We applied for \$15 million on behalf of a coalition of IL school districts and we are awaiting the results
- August 22, 2023 – Environmental Protection Agency (EPA) Clean School Bus Grant Program – Round 2 applications due. We have once again built a coalition of school districts to apply for at least \$30 million in grant funding. Many of these buses will need to be powered with the energy from solar arrays and RECs will be critical to the economics of these project
- September 5, 2023 IL Volkswagen Settlement Fund - Round 5 applications due. We will also apply for electric vehicles under a coalition of IL public schools which will need RECs for solar installation.

Illinois school districts simply need time to make all these decisions.

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- **Inconsistent interconnection times and fees at Illinois cooperatives and longer wait times with utilities** – There are inconsistent interconnection timelines and associated fees throughout most electric cooperative territory. These territories have a great number of Tier 1 and 2 schools wanting to take advantage of the program, but these inconsistencies have made it difficult for both the schools and developers to make decisions.

Also, both electric cooperatives and utilities have reduced access to their grids which has lengthened the renewable energy development process. Specifically, failure to accept and process interconnection agreements is at issue. For example, Interconnection Application approval for solar projects put into the cue in 2021 were granted in 3-6 weeks. Now, these organizations have pushed Interconnection Application approval to an average of 6-9 months.

- **Lack of knowledge toward the importance of RECs** - Many Illinois school districts are still unfamiliar with the Adjustable Block Programs and are unaware of what RECs are and how critical they are to enabling renewable energy development. While organizations like ours are committing maximum resources to educate them, some kind of state sponsored educational initiative would increase awareness and spur development.

In short, solutions include the following:

- a. Simply giving more time to allow renewable energy development projects at Illinois public schools to happen;
- b. Preservation of the REC pool for public schools during that time;
- c. Assistance removing barriers to interconnection applications for public schools; and
- d. Resources dedicated to educating Illinois public schools on RECs and their importance to renewable energy development.

Thanks for your time and attention.

Sincerely,

Jay Curtis  
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Government Solutions Group