



June 6, 2025

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

RE: Illinois Farm Bureau – Chapter 7 LTP Feedback

The Illinois Farm Bureau (IFB) appreciates the opportunity to provide feedback on Chapter 7 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. While IFB does not have feedback on the specific questions regarding Chapter 7 proposed by the IPA, IFB would like to provide general feedback for consideration in developing the 2026 Plan.

Chapter 7 of the 2024 Long-Term Plan describes the application scoring methodology and selection criteria rubric for projects receiving incentives through Illinois Shines. IFB policy, established through a grassroots member driven process, supports prioritization of public funding towards solar projects with a verified agrivoltaics component. While IFB appreciates that an additional point or points are currently awarded to traditional community solar projects and community driven community solar projects that utilize agrivoltaics, additional priority should be provided to these projects through the scoring mechanism. Providing a greater number of bonus points for the use of agrivoltaics would further prioritize projects receiving incentives in either category through Illinois Shines.

As renewable energy project development increases in Illinois and more farmland is removed from agricultural production, our members continue to encourage projects to be constructed on non-tillable properties. IFB policy supports efforts to locate renewable energy projects on marginal or underused lands like brownfields and other non-tillable properties rather than highly productive farmland. Based on this policy, IFB suggests that projects providing documentation that land where the project will be installed is not highly productive and not currently used for agricultural production receive additional points in the scoring process as well. This would encourage projects that utilize less productive land and minimize impacts to production agriculture.

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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