

To: Illinois Power Agency, ipa.contactus@illinois.gov
From: Members of the Renewables and Decarbonization Subcommittees,
IL Clean Jobs Coalition
Re: Illinois Power Agency Requests Stakeholder Feedback for 2024 Long-Term Plan
Development - Chapter 7
Date: June 29, 2023

Introduction

The Renewables and Decarbonization Subcommittees were convened to help implement CEJA as envisioned by the Illinois Clean Jobs Coalition ([ICJC](#)). Our focus includes renewable programs and procurements, with a particular interest in ensuring the IPA helps facilitate the attainment of the state's renewable portfolio standards while also meeting its equity goals. The ICJC is made up of hundreds of environmental advocacy organizations, businesses, community leaders, consumer advocates, environmental justice groups, and faith-based and student organizations working together to improve public health and the environment, protect consumers, and create equitable, clean jobs across the state.

The below-signed Commenters from the Renewables and Decarbonization Subcommittees thank the IPA for an opportunity to provide input on revising the Long-Term Renewable Resources Procurement Plan (LTRRPP). These sets of responses correspond to the IPA's requests for input, due on June 29, 2023.

Signatories:

A Just Harvest
Central IL Healthy Community Alliance
Central Road Energy
Clean Power Lake County
Climate Reality Chicago Metro
Faith in Place
Metro East Green Alliance
Illinois Environmental Council
Sierra Club Illinois
Vote Solar

Chapter 7: Illinois Shines (Adjustable Block Program)

TOPIC 1: Expansion Pricing Resulting in Negative Incentives Levels

Currently, when expansions to already participating Illinois Shines projects are built, the REC price for the expansion will be adjusted to account for the current block price at the size of the combined system (original project size + expansion size) minus the price paid to the original system. Since some project expansions were early program participants (thus have higher REC prices) and the differential between the original project's REC price and the expansions REC price is so large, a negative REC price for the combined system occurs.

Said a different way, since some project expansions were early Program participants with high REC prices, seeking an expansion that would have a lower REC price has sometimes resulted in a lower REC value on the total expanded system compared to the originally-designed system (resulting in a negative incentive value for the total project including the expansion). The Agency seeks a solution for expansion pricing that is both fair and ensures gaming of REC pricing via expansions does not occur.

Questions

1. Is this REC price blending approach (blending of the old REC price with expansion REC price) an effective methodology for system expansions? What incentivizes expansions to already existing projects from a REC pricing perspective?

Answer: We believe that the current REC scheme for system expansions provides an elegant solution in most cases. We propose establishing a floor for REC prices to ensure that system expansions are never negatively priced. This floor could be a percentage of the value as though the system were newly built (e.g. 10% of the REC value as though it were priced as a new system).

TOPIC 2: CS Small Subscriber Limit at 25kW Across All Projects in the Program

Section 1-75(c)(1)(G)(iv)(3)(E)(ii) of the IPA Act explains that under the terms of the REC Contract, all community solar projects are subject to "a requirement that a minimum 50% of subscribers to the project's nameplate capacity be residential or small commercial customers with subscriptions of below 25 kilowatts in size." Furthermore, the definition of "Subscriber" contained within Section 1-10 of the IPA considers the fact that a single customer may have more than one subscription and that multiple subscriptions are all part of the same "subscriber."

To qualify as a small subscriber, the Agency has consistently required that combined subscriptions for that subscriber must total less than 25 kW, in accordance with the IPA Act. The Agency sees this requirement as necessary in order to effectuate the statutory requirements contained within the Act.

To clarify this requirement, the Agency proposed adding the following language to the Program Guidebook in a draft released on March 14, 2023:

To be considered a small subscriber in the Program, the utility account number associated with the subscription may not sum to larger than 25 kW AC across a single or multiple Community Solar projects, if multiple subscriptions exist for the associated utility account.

Multiple stakeholders objected to this clarification and commented that it may be difficult to ascertain whether a customer has subscriptions to other community solar projects. In light of these concerns, the Agency removed the above clarification proposed within the 2023-2024 Guidebook and noted that the issue would be addressed in this next iteration of the Long-Term Plan.

Questions

1. What are other ways that the IPA can ensure compliance with the statute?

Answer: We support the Agency's efforts to ensure small subscribers are truly small subscribers. The proposed language from March 14, 2023, helps to ensure that developers and customer acquisition firms are seeking out new small customers for subscribers. That said, we understand the lack of visibility that these entities experience regarding existing subscriptions, and would like to ensure that penalties are not associated with misrepresentation of subscriber size.

TOPIC 3: Developer Cap

Background

There is currently a developer cap of 20% (applied to an affiliated family of project developers) for two categories in the Program - the Traditional Community Solar and Equity Eligible Contractor categories. For the 2023-2024 program year, a developer cap would have been implemented in the EEC category if the category reached capacity on June 1, 2023, which did not occur. Other Program categories are not subject to a developer cap.

To improve understanding of Program requirements for AVs and Designees and streamline the administration of the Program, the Agency prefers a consistent approach to the application of the developer cap across all categories that utilize a cap.

Questions

1. Would the Program benefit from a developer cap in other categories? If so, what is an appropriate level? 20% has been used throughout the Program's history, but the Agency is open to feedback on a different percentage if supported by appropriate justification.

Answer: Developer caps should be utilized in those subprograms that are highly competitive like traditional community solar. Developer caps discourage "overdevelopment", where a developer is incentivized to submit as many projects as possible to increase their odds in a lottery situation. In this scenario, the program loses credibility in the public's eye when communities, anchor tenants, and landowners who sign on with developers never get projects built. Furthermore, over-development gums up the interconnection queue. A system where over-development is encouraged also favors large well-financed companies over small and emerging companies. No better example exists than the initial year of the adjustable block program, when the total MW of community solar applications exceeded the amount on offer by almost 25 times. We advocate that a cap be imposed when we see businesses operating in a subprogram being impeded by competitors utilizing anti-competitive practices.

The EEC program, whose goal is to enable marginalized individuals and companies to enter and flourish within the renewable energy economy, should also have developer caps. We experienced and communicated our very mixed emotions around the results of the first program year and suggested the developer cap at that time. While it was great to see so much demand in the EEC, it was concerning that the business structures of some of the largest EEC participants resulted in the majority of the EEC funds going to non-EEC companies. This was, in our opinion, not in keeping with the intent of the program. A developer cap, scoring protocols or minimum EEC participation requirements, and the continued allocation of EEC capacity to projects other than community solar, will go a long way to ameliorating our concerns.

We also recommend that IPA consider a cumulative cap on the number of RECs awarded to anyone EEC or EEP over the life of the EEC ABP program. This program is intended to benefit EEPs launching new businesses and to enable the growth and stability of existing small EECs that have struggled. If an EEC is flourishing in the EEC ABP, the program has served its purpose and that contractor should make way for others seeking the same opportunity. If IPA adopts a point system for prioritizing EECs, a modification that we support, we recommend that this system includes consideration of the number of MWs obtained by each EEC to date to ensure that those most in need of access to the EEC REC pool benefit, especially from the upfront payments on offer. To prevent gaming under this approach, IPA would also need to track individual owners to ensure that an EEP is not creating new EECs over time in order to circumvent this limit.

The full potential to advance equity through the EEC ABP will not be realized unless IPA evaluates the degree to which EECs are engaged in and benefit from entire projects, not just the extent to which EECs serve as the Approved Vendor for projects. We view this as an essential modification. It is the only way to ensure that project value significantly transfers to EECs and to guard against EECs serving as limited pass-through companies with little to no investment in the clean energy economy. To do so, we recommend that IPA develop a minimum EEC participation threshold that applies to entire projects. Ways to accomplish this that should be considered include requiring EECs to occupy a certain number of parts of the value stack and requiring a certain percentage of contract/subcontract dollars on a project to go to EECs. Such a threshold would help ensure that EECs are substantially engaged in these projects and gaining opportunities to grow their experience and capacity, as CEJA envisions. Beyond this minimum threshold for participation in the EEC ABP, we also recommend that IPA prioritize REC bids according to the degree to which they advance equity goals above the minimum standard, which can be done through a point system, as proposed by IPA. Doing so ensures that all projects that participate in this program meet a meaningful standard of equity and incentivizes companies to make even stronger commitments to equity.

The need for such an approach can be illustrated through the example of a community solar project. Community solar projects often have an Approved Vendor or Aggregator, a developer, an installation contractor or EPC, a customer acquisition and management service, and other involved companies. Under the current approach, it is our understanding that only the Approved Vendor is required to be an EEC. Who owns the remainder of the value stack and/or receives the bulk of the projected revenue is irrelevant to their qualification for the EEC ABP. Under such an approach, a project can successfully obtain EEC RECs even though only a small fraction of the project's economic benefits are realized by an EEC. We suggest that the IPA establish contractor or designee roles within the development process and require that at least 50% of the value stack and/or project revenue go to EECs. For example, the IPA could require that at least three project roles are performed by EECs, and demonstration of this commitment could be a requirement in applications.

This approach would benefit the many EECs that do not currently have the capacity to function as fully-fledged AVs that develop and build projects. IPA could further spur the growth of EECs if it provided points to projects in which established companies have made concrete, firm commitments to partner with EECs in a manner that provides meaningful learning and growth opportunities and meaningful, demonstrable mentoring. Partnering with an established AV can provide seed capital to an EEC allowing it to, for example, increase its capacity to develop helioscope designs and proposals by hiring qualified personnel to work in-house. Continued growth and partnership could allow the EEC to hire designers to develop one-line drawings and submit interconnection agreements (or pay for services that do the same). These steps will enable an EEC to grow into viable, successful business that can undertake the entire AV scope of work.

Under a points/prioritization system, we also recommend that IPA consider the degree to which an EEC's EEP ownership exceeds 51% and projects where more than 51% of the value stack/project revenue is going to EECs. The most points/highest priority should go to projects that achieve 100% EEC and EEP ownership participation. To prevent against the involvement of companies with token EEP involvement, IPA should also consider assessing whether owner EEPs can demonstrate meaningful control of the company. This could be shown where owner EEPs serve as the final decision maker for key aspects of the business — financial, production, contracting, etc. — or have delegated that authority to an employee manager or another partial owner. It can also be demonstrated by the EEP owner serving as the general partner (or the managing general partner if there is more than one general partner) of a limited partnership or limited liability company; and if the EEP serves as the sole manager, or is able to appoint unconditionally the majority of managers, of a manager-managed LLC.

2. How might a developer cap work in a category with rolling application submissions (i.e., no distinct window for submissions)?

Answer: Developer caps are not needed in categories that have sufficient funding. We would not want a developer cap to slow the deployment of solar if there is more funding in a given year than there are projects. This appears to be the case for rolling application categories (e.g. Small DG) currently, so we do not think that a cap is needed for those categories. Additionally, those categories - and the sales pipelines that fuel them - do not lend themselves well to a developer cap.

That said, we do support point selection processes (including the CDCS, TCS, and EEC categories) that prioritize smaller developers by providing more points for developers with less technical capacity to bid into the competitive program.

3. Are different percentage levels appropriate for different Program categories? If so, please explain why.

Answer: At this stage, we don't believe it makes sense to differentiate based on category or Group.

TOPIC 4: Closing of Program year Before May 31st Each Year

Background

The Program will be operating on an annual cadence that, as it stands now, means closing the Program on May 31st each year and opening a new Program year immediately after on June 1st. This leaves a very short turnaround time for many programmatic activities required to both close out one program year and open another, including but not limited to portal software updates and uncontracted capacity calculations.

Please note, when mentioning “closing of the Program” here, the Agency merely means the closing of the Program for new project applications. Other activities such as AV application renewals, invoicing, REC contract quarterly reporting, Disclosure Form creation, etc. will continue during any downtime contemplated here.

Questions

1. What is the impact to AVs and Designees if the program year closes before May 31st?

Answer: While we understand the need for, and support the concept of, downtime between program years, we encourage the program to keep that time as short as possible and to standardize that time across subprograms.

TOPIC 5: Further Differentiation Between EEC projects

Background

*As stated in the 2022 Modified Long-Term Plan, “**Even with defined subcategories and a developer cap** applicable on the first day, the Agency may encounter a scenario in which it must somehow differentiate between projects of the same type, in the same group, submitted on the same day in the EEC category in 2023-2024. For example, if the Program receives multiple, large, community solar project applications from different EECs on the first day of the program year that exceed that group’s allocation for community solar, some methodology must be used to distinguish between competing applications. The Agency does not at this time propose to create a project scoring system for the EEC category. Given the myriad policy considerations at play with the EEC category, the Agency would prefer to develop any project selection scoring system with input from stakeholders through a formal comment process. The Agency plans to examine this possibility in developing the next Long-Term Renewable Resources Procurement Plan.”*

Questions

1. Do stakeholders see a need for a process that further differentiates between projects within the EEC category? If so, please provide details as to why such differentiation is needed.

Answer: Given the unexpectedly high demand for community solar incentives, particularly in Group A, the Agency should plan for and expect a similar oversubscription scenario to avoid

having to further modify the Long Term Plan once finalized, particularly given the lack of harm in being so prepared. The Agency should also be prepared for a further increase in demand given the growth in EEC certifications since the last procurement (13 were certified at that time and we believe there are now 16 certified EECs), and a likely further increase as more contractors come to understand the EEC category. As such, we highly recommend a project selection protocol in line with our answer to Topic 6, questions 1 and 2.

3. What are ways that Program design can incentivize further differentiation between EEC projects?

Answer: We believe the most equitable way to address oversubscription issues is to create a point system with the input of stakeholders, as suggested by the Agency and described in more detail in our answer to question 2, Topic 6.

TOPIC 6: Public Schools Category Uptake

Questions

1. Are there modifications to the requirements for this category that can be considered that would incentivize additional development in the Public Schools category?

Answer: Based on the results of the last two program years, the Public Schools category has been unable to support behind-the-meter solar projects and, we feel, lacks recognition of the obstacles that Tier 1, Tier 2, and EJ schools face versus their better-funded sister schools in Tiers 3 and 4. We request that the Agency:

Establish two DG REC prices, one for Tier 1 and 2 schools and schools in environmental justice communities (“EJ”) and one for Tier 3 and Tier 4 schools, and a CS REC price for the Public Schools program. The DG REC prices for Tier 1 and 2 schools and schools in environmental justice communities (“EJ”) should recognize the structural and financial challenges that these schools face;

Establish safeguards to ensure savings enabled by higher REC prices for Tier 1, Tier 2, and EJ schools get passed along to the schools;

Facilitate the connection between the Carbon-Free Schools Initiative and the Public Schools program.

3. What unique barriers to the development of distributed generation projects in Public Schools are being encountered by AVs and Designees? How can the Agency address those barriers in order to increase participation in this category? Are there structural barriers to participation in the category that the Agency can address through the Long-Term Plan?

Answer: We understand that major decisions of this kind can take some time to finalize in a public school system. We recommend continuing the rollover of funds, particularly the carveout

for distributed generation projects until more is understood about additional barriers beyond the pricing of RECs.

TOPIC 10: Proposal to Require the IPA's Equity Portal to Certify Equity Eligible Persons (EEPs) for Compliance with the Minimum Equity Standard (MES)

Background

To verify the EEP status of the minimum number of individuals in their project workforce to satisfy the MES, Approved Vendors and Designees will submit a Year-End Report that includes a list of individual EEP utilized for compliance.

As it currently stands, EEPs can be certified either through registration in the Agency's Energy Equity Portal or by filling out the EEP certification form and submitting it to the Program Administrator. The registration of EEPs via the Energy Equity Portal was a functionality that was created in part because it was requested by stakeholders. The Agency proposes a requirement that all EEPs be certified via the Equity Portal, which would ensure a process that is less administratively burdensome for all parties involved. In addition, certification via the Equity Portal will allow employers to avoid asking sensitive questions of their employees and safeguard employee information from employers.

In this proposed requirement/scenario, employers would direct their qualifying employees to seek certification on the Equity Portal, then the Year-End Report to comply with the MES need only provide a list of the qualifying individuals. In this way, the Program Administrator would be able to verify EEP status for all submitted employees using the data from the Equity Portal.

Questions

1. Are there any unintended consequences that may result from requiring EEPs to use the Equity Portal for certification of their EEP status?

Answer: We support the Agency's proposal of using a streamlined webform on the Equity Portal to determine and track compliance.

One potential unintended consequence is how one might distinguish for whom the EEP worked and for how long. The Agency might want to consider requiring an affidavit from the EEP that the company would provide when it reports its MES information or proof of wage payment. This would prevent an AV from taking credit for an EEP that it did not employ.

2. Do stakeholders see any issue with shifting the reporting work onto the EEPs themselves as opposed to the participating AV or Designee?

Answer: The hope of using the Equity Portal would be to provide an additional pathway for Minimum Equity Standard (MES) compliance, not to shift the burden to Equity Eligible Persons or to make this a requirement for them. We view the Agency's proposal to utilize the Equity Portal for compliance as a helpful addition to the compliance framework.

Ultimately, we are all trying to find a streamlined way to determine the numerator and the denominator for MES compliance. The denominator is the total workforce (as defined separately and discussed in another topic). The numerator is the workforce that are Equity Eligible Persons. We believe that ultimately the burden of tracking and reporting/verifying MES compliance should rest on the Approved Vendors and their designees.

We imagine a use case of the Equity Portal whereby an AV or Designee asks all of their employees to complete the EEP webform. The AV or Designee should be able to see the employees that have completed the webform and indicated that they are on the company's payroll. That way, the company can have visibility into their compliance status on an ongoing basis and better understand how they would have to shift their workforce to comply, all without access to specific information about how an EEP qualified for EEP status.

3. What is the preferred method for the certification of EEPs for compliance with the Minimum Equity Standard?

Answer: We prefer certification of EEPs via the equity portal coupled with the submission of an affidavit in the Year End Report from all Approved Vendors and designees to certify that their workforce was in fact their workforce.

4. Are there potential barriers to accessing the Equity Portal for qualifying individuals that the Agency should consider?

Answer: The Agency should encourage employers to provide assistance with accessing the equity portal, should barriers arise.

TOPIC 12: Barriers to Participation in the EEC Category & Program-wide for EECs

Background

The Agency has committed to regularly soliciting feedback from stakeholders and EEC program participants about eliminating or reducing barriers to participation in IPA programs for EECs, and generally how to increase participation by EECs in the Illinois Shines program

The Agency has already solicited feedback on common company ownership structures for EECs and methods for ensuring that entities seeking EEC certification are truly and permanently controlled by and benefit Equity Eligible Persons, but parties are invited to provide responses or additional comments related to this subject matter to this feedback request

Questions

1. What are current barriers that Program participants face in their participation in either the EEC category or the Program in general that should be understood by the Agency? Please

provide a detailed explanation of the barrier and suggestions on how the Agency might work to overcome the barrier.

Answer: We think the biggest systemic barrier faced by EECs trying to access the benefits of the EEC subprogram is the gold rush mentality by community solar developers. By gobbling up the entire program's allocated capacity in the first open window (Program Year 5), EECs that were not partnered with large CS developers had no chance to submit projects. Especially smaller DG projects, the bread and butter for an EEC that is trying to bootstrap their company into profitability. We were glad that the program agreed to developer caps and partitioned the allocated capacity between CS and DG. As the number of EECs grows, we would like to see where the new EECs focus their development efforts and increase the percentage

Another barrier that the Agency can address is to award the projects and distribute non-controversial upfront payments to EECs. PY5 projects have not yet been officially awarded and, to our knowledge, no upfront money has been paid. How is it possible for an EEC to develop new projects if they requested (and actually needed) upfront money from the program and have not received it? The delay caused by the program is impacting the ability of some EECs to get their companies off the ground.

Also, we encourage the Agency to coordinate with the Department of Commerce and Economic Opportunity (DCEO) to ensure that prospective EECs are aware of the opportunities made possible by the Jobs and Environmental Justice Grant Program. This program allows for grants of up to \$1 million to Equity Eligible Contractors looking to develop clean energy projects, projects that would likely make a great fit for the EEC category.

Lastly, we encourage the Agency to coordinate with the Department of Commerce and Economic Opportunity (DCEO) to ensure that prospective EECs are aware of the opportunities made possible by the Jobs and Environmental Justice Grant Program and the Contractor Accelerator Program. The grant program allows for grants up to \$1 million to Equity Eligible Contractors looking to develop clean energy projects, projects that would likely make a great fit for the EEC category.

2. Are there future barriers that entities expect to face in this category as it ages that are not currently present of which the Agency should be aware?

Answer: The full potential to advance equity through the EEC ABP will not be realized unless IPA evaluates the degree to which EECs are engaged in and benefiting from projects awarded through the program, not just the extent to which EECs serve as the Approved Vendor for projects. We view this as an essential modification. It is the only way to ensure that project value significantly transfers to EECs and to guard against EECs serving as limited pass-through companies with little to no investment in the clean energy economy. To do so, we recommend that IPA develop a reporting and tracking system that measures the EEC participation in a project.

We also think that a minimum EEC participation threshold should apply to projects applying through the EEC subprogram. Ways to accomplish this that should be considered include requiring EECs to occupy a certain number of parts of a project's value stack and requiring a certain percentage of contract/subcontract dollars on a project to go to EECs. Such a threshold would help ensure that EECs are substantially engaged in these projects and gaining

opportunities to grow their experience and capacity, as CEJA's goals envision. Beyond this minimum threshold for participation in the EEC ABP, we also recommend that IPA prioritize REC bids according to the degree to which they advance equity goals above the minimum standard, which can be done through a point system, as proposed by IPA. Doing so ensures that all projects that participate in this program meet a meaningful standard of equity and incentivizes companies to make even stronger commitments to equity.

TOPIC 13: Traditional Community Solar Scoring Guidelines

Background

On May 11, 2023, Senate Bill 2226 passed both houses of the Illinois General Assembly. This bill, which has yet to be sent to the Governor for signature, specifies that Conservation Opportunity Areas, as designated by the Illinois Department of Natural Resources, will no longer be included in future iterations of the Traditional Community Solar (TCS) Scoring Guidelines beginning in the 2024-25 Program year. The Agency seeks feedback on how to modify the TCS Scoring Guidelines in the event that SB 2226 is ultimately enacted, as well as other considerations related to the scoring process.

Current TCS Scoring Guidelines can be found here:

<https://illinoisabp.com/wp-content/uploads/2022/10/Final-TCS-Scoring-Guidelines-7-Oct-2022.pdf>

Questions

4. Do stakeholders find that commitments to scoring points both under Agrivoltaics (scoring criterion 1.c) and the Pollinator Friendly Habitat (scoring criterion 1.d) are at odds? If so, please explain why and how the Agency can amend these scoring criteria to solve this issue.

Answer: We were pleased to see that the TCS scoring incentivized project developers to commit to both agrivoltaics and pollinator-friendly habitats. This, along with other criteria prioritized by the Agency, allowed for projects with higher social and environmental co-benefits to rise to the surface and be selected for limited REC incentives.

That said, we are concerned that it is difficult for community solar developers to effectively commit to both pollinator-friendly habitats and utilize agrivoltaics best practices. While it might technically be possible to do both simultaneously, we fear that it will be to the detriment of both goals to allow them as separate commitments.

Put more directly, we are unsure if sheep can graze or crops can grow on a project that has already committed to pollinator-friendly planting and if the pollinator planting can therefore satisfy the IDNR scorecard. We look forward to learning more from other stakeholders about how to best prioritize these two priorities that might be in conflict. Until then, we invite the Agency to consider adjusting the point system so that project developers must choose either pollinator-friendly habitat *or* agrivoltaics, with a higher point preference for agrivoltaic projects.

5. Please provide any other feedback on changes to the TCS scoring guidelines that might be relevant to ensuring that the multiple goals of TCS project development – encouraging solar development state-wide, best-utilizing land in the state that cannot be otherwise utilized for conversation/farming/etc., and diversifying project attributes amongst TCS projects.

Answer: Food production and energy production are essential to the well-being of society and in order to meet 2050 climate goals, it's imperative that we transition to a regenerative food system and clean renewable energy sources. This is not an either-or scenario; both transitions must happen. The Nature Conservancy's [Power of Place](#) approach, which was developed in partnership with American Farmland Trust and others, identifies pathways to expand renewable energy projects with minimal disturbance to highly productive agricultural lands and increased economic incentives to farmers for siting renewable energy projects on under-performing croplands. The study lays out the methodology that energy system planners and decision-makers can use to create plans and develop policies that meet multiple societal goals, including food production.

Recognizing the large number of renewable energy projects needed to achieve net-zero emissions, *Power of Place* researchers considered two land-saving approaches to reduce impacts on natural and working lands: agrivoltaics and co-location of wind and solar.

- Agrivoltaics is a promising strategy for producing food and generating solar energy on the same land. Agrivoltaics is an uncommon practice that is gaining traction and is likely to grow as innovations advance and incentives offset additional costs.
- Co-location is a land-saving approach where wind and solar are deployed in the same project areas, thereby reducing the impact on natural and working lands.

A range of incentives and approaches should be used to reduce greenhouse gas emissions while maintaining agricultural production. The *Power of Place-National* study finds there are and will continue to be difficult tradeoffs between minimizing disruption to communities, protecting important natural areas, maintaining highly productive croplands, and deploying responsible, equitable clean energy infrastructure. Many impacts, however, can be avoided through long-term energy planning that incentivizes clean energy deployment in low-impact areas. We should increase incentives for land-saving approaches, such as co-location of wind and solar on appropriate agricultural lands and agrivoltaics.

Recommendation: Increase current scoring criteria for agrivoltaics/dual use from 1pt to 2pts.