

Stakeholder Feedback Request for the 2024 IPA Long-Term Plan Chapter 7: Illinois Shines (Adjustable Block Program)

June 21, 2023

Lightstar Renewables, LLC (Lightstar) is pleased to respond to the IPA's request for comments on the 2024 Long-Term Plan Renewable Resources Procurement Plan (LTRRPP) opening.

TOPIC 6: Public Schools Category Uptake

Background

Since the inception in December 2021 of the three additional Program categories established by the Climate and Equitable Jobs Act (EEC, CDCS, and Public Schools), there has been slow uptake in the Public Schools category.

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?

LIGHTSTAR RESPONSE: As part of the requirements to submit into the Public Schools block, a school/district must own the land on which a project submitted to the Public Schools category is sited. This "land ownership" requirement has proven particularly onerous for our origination team. Lightstar had the opportunity to participate in a recent "Schools Roundtable" with Energy Solutions, the program administrator. The land ownership requirement was the most significant barrier to participation in the schools block, as identified by all developers participating. Lightstar recommends that the IPA reassess this land ownership requirement because it vastly limits the availability of land for project development, particularly sited in urban areas. Lightstar concurs with the Joint Solar Parties as they indicated that the more restrictive adjacency rule has further deterred participation in the block.

Additionally, the speed of school procurement, which involves contacting public schools that are not always communicative or easy to track down. That longer sales cycle is not a problem *per se*, but it does explain the slower uptake. Perhaps the program administrator can facilitate communication with public school districts.

2. What unique barriers to development of distributed generation projects on 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?

LIGHTSTAR RESPONSE: We would like to reiterate that Lightstar would be able to participate immediately with public schools as offtakers if the adjacency rule was

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amended to allow for projects directly co-located to the school parcel or in the case of urban schools, a wider radius, such as up to 5 miles away from the school.

TOPIC 11: Application Requirements

Background

As the Illinois Shines program embarks on its fifth year since inception, the Agency is looking for feedback related to application requirements for both the Part I and Part II applications. Current requirements can be found in Appendix I and Appendix J of the Program Guidebook.

Questions

1. Are there any application requirements that require updating? If so, please explain which requirements and how they should be updated.

LIGHTSTAR Response:

The program administrator/IPA should endeavor to announce prior to program year opening about specific updates that would be made to the application portal. For instance, in the most recent application window, after we had initiated the application, the IPA added a new question to Section 7 (at around 4 PM EST the day before the block opened). We could not “revisit” the question so we had to put our response in the general comments section of the application.

2. Are there any application requirements that should be tightened?

LIGHTSTAR RESPONSE: The process for confirming payments needs to be tightened. For instance, during payment for submitted projects, Lightstar confirmed the payment process; however, the confirmation process did not work. Lightstar teams had to reach out to the IPA and attach the email correspondence to prove how we were told to pay.

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

1. Should the Agency consider another approach to discourage the development of TCS projects on greenfields or land that is available for conservation? Please provide details on what approach the Agency might use to ensure development does not coincide with this type of land.
2. Are there any changes that stakeholders can suggest that may reduce the administrative lift of scoring TCS projects, while still accomplishing the goal of differentiation between projects?
3. Does the interconnection fractional point process provide enough differentiation between projects? Should this process be revamped at all? If so, please explain why.

LIGHTSTAR RESPONSE: There needs to be more interconnection queue transparency on the part of the utilities in order to understand the differentiation between projects.

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 for this issue.

LIGHTSTAR RESPONSE: Yes. Lightstar has previously flagged the mismatch to the IPA. The scoring is not the problem, it is the pollinator scorecard that is the issue. The cleanest possible solution is updating the pollinator scorecard. To provide context, the mismatch only comes into a play if a developer elects for both AgPV and Pollinators to submit projects into the program. The IPA uses the Illinois Pollinator Score Card to determine if the project qualifies for the pollinator points. On that score card it disqualifies projects who use insecticides or pesticides in any form. This leaves developers with very slim options for “IL pollinator friendly” agPV crops. As a consequence, developers who choose to elect for both points are relegated to certain types of hay for their projects. Ultimately, by doing this the AgPV farmers are pigeonholed to only have hay for 25 years. This is fine in theory, but there should be diversity of crop production and grazing on IL ABP AgPV projects. Accordingly, the scorecard needs to be amended so that one can incorporate both agPV and pollinators without jeopardizing the other.

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.

LIGHTSTAR RESPONSE: Lightstar commends the IPA for its leadership on bringing Agrivoltaics to the Midwest through Illinois Shines. We suggest projects that adopt crops and robust livestock production receive more points than those who adopt sheep grazing for purposes of maintaining the site vegetation. Sheep grazing

for maintenance is a temporary agricultural use of the land and does not require continued use of a parcel or extensive planning and integration when compared to crop and permanent livestock operation integration. This is because it is far more difficult to develop an agPV project than it is to incorporate pollinators or grazing for maintenance into a solar project. AgPV projects continue to grow in popularity and viability, particularly to address land efficiency concerns. Accordingly, we suggest that AgPV projects that demonstrate robust permanent agricultural use with crop or livestock production on site receive more points than pollinators or those who use grazing for vegetation management a couple times a year.

Because the demonstration of how robust in nature is only formally review in Part II of the application process, Lightstar is wary that the majority of projects that elected for AgPV and pollinator points have not thoroughly thought through the entirety of the AgPV technical integration process and the IPA will see some projects not able to meet Part II review adequately. Additionally, Part II of the application process comes only after the project has construction underway. This would be too late in the process to have meaningful feedback. We suggest that the verification of plans take place during Part I of the process and only confirmed in Part II. Additionally, we believe that “documentation” be more specific during Part I and require a diagram showing the proposed plan, with input from an agricultural specialist. Finally, since the penalty for not compliance in Part II is revocation of the REC contract, this posed a major risk to investors looking to finance AgPV projects. If the verification of the plans came in Part I before the construction of the project, this would ease issues with financiers and the design would have been verified and construction could move forward with confidence.