



## **Illinois Adjustable Block Program (Illinois Shines)**

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

**Subject:** Proposal to Establish a Dedicated Agrivoltaics Project Category within the Illinois Shines Program

Dear Illinois Adjustable Block Program Administrators,

Thank you for the opportunity to provide feedback on the IPA's 2026 Long-Term Renewable Resources Procurement Plan. We commend the IPA for its ongoing leadership in advancing renewable energy and fostering equitable, community-centered solar development across the state.

We respectfully submit this letter to propose an important enhancement to the Illinois Shines Program: the establishment of a dedicated **Agrivoltaics Project Category**. This proposal aims to significantly improve the adoption of agrivoltaics in Illinois. Currently, agrivoltaics projects are awarded only a single waitlist point under the Illinois Shines program. This is not sufficient to drive true growth of agrivoltaics projects, a fast-growing segment of the industry.

To better align program incentives with the state's sustainability goals, we recommend creating a separate Agrivoltaics Category utilizing historical unused capacity in other program categories or utilizing capacity from the Traditional Community Solar Category. By reallocating from the Traditional Community Solar Category, the IPA is effectively replacing traditional ground-mounted solar projects with higher-value, dual-use agrivoltaics developments of similar scale and location.

Projects participating in this dedicated category would need to meet enhanced requirements beyond the current agrivoltaics requirements to promote maximum flexibility to the agricultural user, including:

- The continued requirements for the cultivation of crops and/or commercial livestock grazing for the useful life of the project.
- Array designs that exceed current industry standards, specifically requiring increased height and/or row spacing to accommodate both crop and grazing agricultural activities and buried electrical cable to accommodate farm equipment and/or animal circulation.

### **Justification for a Dedicated Agrivoltaics Category**

1. **Agrivoltaics Provide Greater Economic Value than Pollinator-friendly Habitat Projects**  
Currently, agrivoltaics projects receive equivalent treatment to pollinator-friendly habitats. Pollinator-friendly habitats are valuable, and we commend the IPA for this recognition.



However, agrivoltaics deliver more extensive benefits to farming communities by enabling the continuation of agricultural production. American Farmland Trust’s 2020 report “Farms Under Threat: The State of the States”, noted that between 2001 and 2016, 177,000 acres of Nationally Significant agricultural land in Illinois were converted to urban development. Agrivoltaics presents an opportunity to safeguard land from urban development while allowing it to contribute to the ongoing energy transition.

**2. Economic Development and Rural Revitalization**

Agrivoltaics projects support farming landowners by enabling dual revenue streams: solar lease payments and continued revenue streams from farming. If the land is farmed by a tenant farmer, agrivoltaics may allow for their continued access to the land. Alternatively, payments made by agrivoltaics array owners to farmers for vegetative maintenance services represent a reliable stream of income, immune from variations in market conditions and the effects of climate change on agricultural production. This model promotes agricultural preservation and resilience while creating new business opportunities.

**3. Advancing Public Interest and Workforce Development**

Agrivoltaics enjoy broad public support and present meaningful opportunities for workforce training and local employment. Agrivoltaics present an opportunity to revitalize segments of American agriculture and has the potential to facilitate access to land ownership or, at a minimum, secure long-term tenure for farmers who do not own land. By prioritizing these projects, the Illinois Shines program can further position itself at the forefront of dual-use solar innovation and contribute to a more resilient and inclusive clean energy economy.

**4. Efficient Use of Existing Program Capacity:**

By reallocating historically unused capacity from existing program categories or from the Traditional Community Solar category, this initiative would not change the scale and scope of the Illinois program but rather enhance future projects. Moreover, introducing a dedicated category does not require additional funding. Rather, it better aligns existing incentives to promote high-value projects, improving overall program effectiveness without adding financial burdens.

We appreciate your consideration of this proposal as an effective approach to further strengthen the Illinois Shines Program, benefit agricultural communities, and support the state's long-term renewable energy and sustainability objectives.

Thank you again for your time and consideration. We look forward to continuing this dialogue and supporting a robust clean energy future in Illinois.

Sincerely,



**SOLAR & FARMING**  
— ASSOCIATION —

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