

Future Green Energy Consortium (FGEC)

Illinois Power Agency (IPA)

Response to Request for Stakeholder Feedback – November 12, 2021

Future Green Energy Consortium (FGEC) is a not-for-profit initiative of the Illinois Association of School Administrators, the Illinois Association of School Boards, and the Illinois Association of School Business Officials created after the 2017 passage of the Future Energy Jobs Act. Since then, FGEC's mission has been to lower the overall energy costs for Illinois school districts and help those member schools build renewable energy solutions. FGEC is dedicated to helping every IL public school reduce their carbon footprint and improve the environment.

FGEC is appreciative of the opportunity to provide feedback to the Illinois Power Agency (IPA) and answer questions. Please see response below.

Illinois Solar for All Program Questions – p. 4 Question # 18

Public Act 102-0662 of the IPA Act (as modified by Public Act 102-0662) expands the Adjustable Block Program in Section 1-75 (c)(2)(K)(iv) directing the creation of a block dedicated for solar projects installed at public schools, with priorities for projects located within environmental justice communities.

Since the Adjustable Block Program will now include a category specifically for public schools should public schools no longer be eligible to participate in ILSFA?

The overall intent of the ILSFA program is to facilitate the development of new solar generation assets in Illinois and should not deny eligibility of any public schools to participate in ILSFA. There may be a circumstance where it may make sense to be in the ILSFA rather than the Adjustable Block category for Public Schools.

In fact we want to ensure that schools in municipal utility/coop territory are included. As the IPA is aware, there is legal precedent in IL (Commonwealth Edison Co. v. Illinois Commerce Commission, 2nd App, 2019) that schools located within Muni/Cooperative territories should be included in the REC program.

Illinois Solar for All Questions – p. 4 Question # 19

Are there types of schools that wouldn't qualify under Section 1-75(c)(2)(K)(iv) that should still be considered eligible for ILSFA?

The only ones we need some clarity on are Private schools, trade schools, for profit colleges and public schools located in municipally owned power areas?