

Comments related to Community-Community Solar projects

Response to request for Stakeholder Feedback, Adjustable Block Program

a. Related to Item (1), what does community ownership look like? The Agency is interested in different community ownership structures and/or minimum criteria for a project to qualify as community owned.

Municipal and county governments, and other special use taxing bodies like joint action water agencies, have experience owning and managing utilities, and distributing services to community residents and businesses. These government agencies own and manage water and waste-water utilities. Some municipalities own and manage electric and gas utilities. Community ownership by these local governments, could be collectively referred to as municipally owned. For these models, community ownership means that physical assets are procured using public funds and maintained by public employees, or by private companies under contract by the public agency to manage these utilities. Revenues from the sale of the service (water, electricity) support the operation of the utility. Excess revenues are used to support other public services that benefit the community.

Under this model, decision making about the development of assets, investments, and ongoing operations are made through democratically elected and accessible civic leaders. Public governance is transparent and accessible by existing state and local statute. These existing structures and assurances of public benefit should be valued highly in evaluating community-driven community solar projects.

b. Related to Item (1), how should the Agency define community wealth-building? Should the project continuously build wealth in the community? Or is a one-time influx of wealth into the community sufficient? Should there be requirements regarding the recipient(s) of the wealth the project builds?

A municipally owned community solar project would provide transparent and accountable community wealth-building. As with other types of public utilities, benefits are incurred regularly, assuming operations are successful and cost-effective. Community-driven community solar projects should be required to provide transparent accounting and reporting mechanisms for wealth-building, as local governments do.

c. Related to Item (2), how should the Agency evaluate direct and indirect community benefits? The Agency is interested in proposals to define and/or establish minimum requirements for both direct and indirect community benefits.

d. Related to Item (2), how should the Agency evaluate and score community benefits, whether direct or indirect? What might minimum requirements for community benefits look like?

The Illinois Municipal Code (65 ILCS 5/) grants municipalities authority to create a comprehensive plan for “the present and future development or redevelopment of the municipality”, including solar energy systems. Plans are usually developed with stakeholder input in a public process, then approved by the village board or city council. These plans include recommendations to reach the desired vision of the community. Evaluation of community-driven community solar projects should address the goals and vision articulated in the municipal comprehensive plan. Proposals for community-driven community solar projects that conflict with goals expressed in municipal comprehensive plans should not be favored.

e. Related to Item (3), how should the Agency define meaningful involvement as it relates to project organization and development? What documents may be available that would demonstrate meaningful involvement? How can the Agency verify meaningful involvement?

Municipalities and counties offer transparent and accessible avenues for meaningful community involvement through citizen commissions. Citizen commissions are established and governed by municipal code, and plan commissions are additionally authorized and governed by state municipal code. See example here <https://www.hpil.org/454/Boards-Commissions>

Citizen commissions may have the purview of land use, sustainability, economic development, and other community concerns. Commissioners are community residents who volunteer their services and operate within the requirements of local public meetings (5 ILCS 120/). This verifiable and public record would assure “*engagement in project operations and management by nonprofit organizations, public entities, or community members*”.

(8) otherwise meaningfully advance the goals of providing more direct and tangible connection and benefits to the communities which they serve or in which they operate and increasing the variety of community solar locations, models, and options in Illinois.

Consideration should be given projects that address goals local sustainability plans or climate action plans. Dozens of municipalities and some counties have community-driven sustainability, energy, and/or climate action plans. One-hundred thirty-six northeastern Illinois communities and 4 counties have formally endorsed the sustainability goals of the [Greenest Region Compact](#). Community-driven community solar projects that align with these plans and the compact should be understood to “*meaningfully advance the goals .. and benefits to the communities which they serve*”

Thank you for the opportunity to comment. I can be reached at emakra@mayorscaucus.org

Respectfully submitted, December 3, 2021

A handwritten signature in black ink, appearing to read "Edith Makra". The signature is fluid and cursive, with the first name "Edith" written in a larger, more prominent script than the last name "Makra".

Edith Makra
Director of Environmental Initiatives