

11-4-21

**ILLINOIS POWER AGENCY (IPA)  
RESPONSE TO REQUEST FOR STAKEHOLDER FEEDBACK**

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 member schools build renewable energy solutions. FGEC is dedicated to helping every Illinois public school reduce its carbon footprint and improve the environment.

FGEC is appreciative of the opportunity to provide feedback to the Illinois Power Agency (IPA) regarding the interim period of the new Public School Projects Category of the Adjustable Block Program.

FGEC is also appreciative of the efforts made by the IPA to help ensure priority is given to Tier 1 and Tier 2 public schools in the program, a concept put forward by and championed by FGEC. FGEC recommended this approach to ensure schools with historically fewer resources are given the greatest opportunity to find overall savings through renewable solar energy development.

FGEC agrees with the IPA's proposed dedication of 70% of the block capacity to Tier 1 and 2 schools and the balance to Tier 3 and 4 schools. This reflects the percentage of Tier 1 and 2 schools as an amount of the total schools statewide and sets aside the amount they need to all be engaged in the program.

FGEC believes the 180-day period currently proposed for the 70/30 allocation is too short. It will likely take longer for Tier 1 and 2 school districts to find solutions to structural and systemic issues such as space, contractual constraints and building integrity. We would therefore recommend that the 70/30 allocation remain in place for a period of at least one year.

However, we want to ensure that it is clear no school, regardless of its Tier designation, is prohibited from getting started on building its solar projects as soon as December 14, 2021. We understand this is the date that additional blocks (with REC pricing) will open.

We also note that, while there is no discussion of Adders here, most school districts in Tiers 1 & 2 will have build sizes on the lower end of the spectrum. Given the lack of economies of scale and other economic factors, projects less than 600KW are likely to need Adders to make them viable to build.

We concur that the annual Evidence-Based Funding Distribution process conducted by the Illinois State Board of Education is the best way to determine Tier 1 or Tier 2 status. It is the recognized statewide

standard used to determine a school's fiscal ranking. It should be used here to determine what the tier designations of schools for purposes of this program.

Based on our experience, the majority of school solar project build sizes are 200–750 kW. We do believe there is a need to change the proposed size of the categories to better fit those actual school build sizes. We believe what follows better represents the energy loads of schools.

25% = Under 250 kW

50% = 251 kW-1 MW

25% = Over 1 MW

In other words, the majority of RECs (75%) should be allocated to projects 1MW and below, while 25% or less should be allocated to school projects above 1MW. There are few projects at Illinois schools that will be 1MW in size or greater.

We agree with IPA's position on allocations as they pertain to Group A, Group B and community solar projects.

Sincerely,



President, Future Green Energy Consortium  
Executive Director, IASA

