

To: ILLINOIS POWER AGENCY

From: LIGHTSTAR RENEWABLES, LLC

RE: RESPONSE TO ILLINOIS POWER AGENCY "POINT SCORING SYSTEM FOR COMMUNITY SOLAR" REQUEST FOR COMMENTS ON BEHALF OF LIGHTSTAR RENEWABLES, LLC

Date: September 16, 2022

Background

Lightstar Renewables (Lightstar/LSR) is a community solar developer based in Boston, MA focused on solar for both the land and the community. Lightstar has a portfolio of agrivoltaics projects being developed across the nation. Our team is pioneering the farm-centered and cost-effective deployment of community solar sized agrivoltaic systems in markets with decarbonization goals and land-use concerns similar to Illinois. Agrivoltaics is an emerging niche that combines agriculture and solar photovoltaics to provide dual uses for land.¹ The model is increasingly gaining support and recognition nationwide. For instance, the Department of Energy on behalf of the Biden administration recently announced \$8 million in funding into agrivoltaics research and deployment.²

Proposed Approach for Waitlist Acceptance

The IPA is currently proposing a minimum score of 5 points to receive a spot on the waitlist. While Lightstar finds this threshold respectable, we align with the JSP's proposal that the minimum threshold should be lowered to 4 points. It is important that the barriers to entry are not excessively high for developers to participate in the program. Furthermore, with this maximum amount of 4 points, a project can meet with signed IA criteria and qualify for one more criteria as mandated by the Illinois Commerce Commission.

Agrivoltaics Projects

As leading industry experts in Agrivoltaics, Lightstar aligns with the IPA's following definition:

¹ https://energynews.us/2022/06/22/on-washingtons-colville-reservation-solar-powered-microfarm-looks-to-prove-model-to-boost-food-energy-sovereignty/?utm_medium=email

² <https://www.energy.gov/eere/solar/articles/funding-notice-foundational-agrivoltaic-research-megawatt-scale-farms>

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*“[a] configuration where solar photovoltaic energy generation and agricultural production (crops, livestock, and livestock products as defined by 505 ILCS 5/3.02) are directly integrated and simultaneously **producing** within the footprint of the project.*

Lightstar believes that Illinois farmers, municipalities, and ratepayers could benefit from this innovative community solar project type. As the Illinois Power Agency (Agency) moves forward with awarding agrivolatics as part of the points preference, Lightstar agrees with recommendations that suggests the adoption of procedural (though not substantive) compliance requirements that will enable operational flexibility, project development ease and shared learning. One suggestion is of regular reporting requirements once the project starts operation. **However, we do request that agrivoltaics projects should not be treated as pilot programs.** Despite the model being new to Illinois, it exists and works in other jurisdictions and globally.

Lightstar further suggests that this reporting requirement be bundled with the annual reporting requirements that developers of non-agrivoltaics community solar projects are currently mandated to submit. While agrivolatics projects are new to Illinois, these projects exist in other states - there are existing agrivoltaic systems in the United States and worldwide totaling 3GW. These projects also exist overseas (in Germany and Japan). The innovative quality of these projects should not elicit scrutiny of the projects. As previously stated, agrivolatics is growing in popularity. **One reason is because the model can tackle several issues at once, such as: addressing the massive pressure solar has had on agricultural land; solving for pertinent issues at the intersection of energy and food justice; as well as protecting crops from increasingly extreme and frequent heatwaves this past summer.** The US and the rest of the world grappled with heatwaves and scorching temperatures this past summer. The unprecedented heat this past summer affected daily life, including food crops. The intense heat and dry conditions stressed U.S. agriculture, threatening corn, soybeans and other crops, as well as cattle herds.³ The hot weather hit during an important period of Midwest-crop growing season stressing crops and ranchers' herds. Experts have claimed that due to climate change, the frequency of heatwaves will intensify for years to come.⁴ As crops wilt from the extreme heat, agrivoltaics can be leveraged to address this phenomenon. The height and angles of the panels can protect crops from excessive heat and can affect the shade and sunlight reaching each row of crops. It's worth noting that not all crops need sunlight all

³ <https://www.wsj.com/articles/heat-wave-hits-u-s-farms-stressing-crops-and-ranchers-herds-11658568602>

⁴ <https://www.nytimes.com/2022/06/24/climate/early-heat-waves.html>

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day, and some do better when shaded some of the time.⁵ Suffice to say, the arrival of agrivoltaics in Illinois could not come at a better time. Lightstar is excited to be spearheading this innovation into the market.

In response to the IPA's question regarding whether grazing should be considered part of agrivoltaics, **Lightstar recommends that grazing should NOT be considered agrivoltaics unless the land had previously been used for grazing or as a livestock enterprise.** This ensures that the integrity of the agrivoltaics definition is maintained. For grazing operations, Lightstar further recommends that grazing projects provide a livestock management plan to the IPA prior to commercial operation. A suggestion is to engage the Illinois Department of Agriculture on this effort. Regarding the proposed 75% threshold for activities, the Lightstar recommends that this threshold be maintained.

Maintaining the Integrity of the CEJA negotiations

During the CEJA negotiations last fall, the Agency and legislators alike pointed out some endemic gaps with community solar such as the pressure it has had on agricultural lands. Other criticisms included the concern of community solar being concentrated in rural areas and the same counties; taking over prime farmland; not being sited in environmental justice communities; being expensive and a general lack of innovation. Since the legislation passed, the IPA released the initial long-term plan with project selection points that maintain the integrity of these concerns. **Lightstar is new to the market but is actively listening and values the criticisms and concerns lobbied at community solar. We are working to ensure that our Illinois projects address all of these concerns to the best of our abilities.** We are also very aware of the cost concerns; we are able to propose agrivoltaic projects using off-the-shelf racking systems. We aim to be able to use market-ready systems that don't increase project costs and still have positive crop production outcomes. It is paramount that developers new to the market such as Lightstar have a fair and equitable opportunity to compete in the upcoming traditional community solar blocks. We want to ensure that developers new to the Illinois market are given ample and equitable opportunity to set ourselves apart and prove that community solar can in fact work and meet Illinois' residents' needs. As such, it is important that the point selection process maintains the integrity of the CEJA negotiations and does not inadvertently skew towards more "mature projects" from entrenched developers.

⁵ https://energynews.us/2022/06/22/on-washingtons-colville-reservation-solar-powered-microfarm-looks-to-prove-model-to-boost-food-energy-sovereignty/?utm_medium=email

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Signed Interconnection Agreement and Project Maturity

Lightstar recognizes that the Illinois Commerce Commission has accepted the JSP's request that a signed ICA be included in the interconnection category of the project scoring criteria. However, the Commission did not make a finding on the appropriate number of points to assign to this criterion, and leaves that decision to the IPA, in consultation with stakeholders. **Lightstar is pleased to see that there is now an opportunity for projects with a signed interconnection agreement to receive a point regardless of the recency of the agreement. This ensures that developers new to the market (CEJA regime) can equitably participate in the program. Lightstar is appreciative of this new development. Likewise, a high queue position should receive 1 point.** This is to ensure that the program is still accessible and equitable to developers new to the Illinois market, while ensuring that the interconnection queue matches the program queue. Thus, awarding one point for high queue position provides an additional method to better align the program queue with the interconnection queue. As previously stated, the program was not created to be weighted towards long-time developers in the market.

Equity Eligible Contractors (EEC)

Regarding the commitment and verification aspect of the EEC category, **the JSP recommends this commitment be demonstrated in a flexible manner, such as through an attestation during initial application from the AV** that they will use an EEC and an attestation from the EEC that they are capable of doing the work, with proof required at Part II. Lightstar also supports the JSP's stance that encourages the IPA to publish a list of EECs or EEC-certified designees to continue to encourage collaboration between EECs and non-EECs and make it more likely more projects will meet the goals in this point section.

Finally, *Lightstar is curious to see if the IPA will consider facilitating a pre-block opening workshop* to answer any clarifying questions developers may have and to provide a sounding board for pre-CEJA and post-CEJA developers alike to engage with the IPA. We humbly hope that the IPA takes all of Lightstar's concerns and recommendations under consideration as the traditional community solar project selection process are being finalized.

Sincerely,

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Theodora Okiro



Manager, Policy and Strategy
Lightstar Renewables, LLC