

From: [REDACTED] on behalf of [IPA.ContactUs](#)
To: [IPA.Solar](#)
Subject: COMMENTS - EnPower Solutions, LLC - Response to Public Schools Feedback Request
Date: Thursday, February 23, 2023 2:53:58 PM

COMMENTS - EnPower Solutions, LLC - Response to Public Schools Feedback Request

From: Cody Doores [REDACTED]
Sent: Thursday, February 23, 2023 2:04 PM
To: IPA.ContactUs <IPA.ContactUs@Illinois.gov>
Subject: [External] EnPower Solutions, LLC - Response to Public Schools Feedback Request

Questions for Feedback on Land Ownership Requirement

1. Under what circumstances, if any, should the Agency consider allowing land where a project participating in the Public School category is sited be sold to an entity that is not a public school or public school district, and the project be allowed to continue to remain under contract and deliver Renewable Energy Credits for payment? *I don't see a scenario where this is needed. However, we have seen that Public School Boards (PSB) are leery to tie up the school's land for 20+ years. Being able to access additional land would allow PSB to be more motivated to pursue this block.*
2. If the Agency does allow for land where a project participating in the Public School category is sited be sold to an entity that is not a public school or public school district, what should be the parameters around such an allowance? *I'm not sure if that scenario would be necessary. The only case I could see is if the school merged or was consolidated. I would imagine the school district would then have the desire to sell the property.*

Questions for Feedback on the Anchor Tenant Requirement

Components of Waiver

1. The Agency proposes the following items as requirements for the waiver request:
 - i. Reason for waiver request (i.e., explanation of circumstances that prevent the public school from continuing to act as an anchor tenant)
 - ii. Percentage of the project that the public school will subscribe to should waiver be granted (should be within 10-40% range as outlined in the Long-Term Plan)
 - iii. Timeline under which the Approved Vendor thinks that the project will be 90-100% subscribed if/when waiver is granted to diminish the subscription size of the public school
 - iv. Type of subscribers that will be used to backfill the subscription amount that the public school is diminishing their subscription by
2. What additional information should be required in a waiver request that the Agency does not contemplate here? *none*

Permissible Reasons For Waiver Request

3. What are permissible reasons that a waiver from the anchor tenant might be requested? The Agency is looking for feedback on specific examples of circumstances that should or should not be considered qualifying for this waiver. *As mentioned above, the only case I could see is if the school merged or was consolidated. Potentially could see a school's energy load profile dropping, due to lower attendance but highly unlikely.*

Review of Waiver

4. What documentation should an Approved Vendor need to provide with a waiver request?

A letter from school board, yielding school merger/consolidation and a news article.

5. How can a school demonstrate with existence of a situation that would give rise to the need of a waiver? none

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