

To: Illinois Power Agency

From: Lightstar Renewables, LLC

RE: Response to Illinois Power Agency (IPA) Stakeholder Feedback – Public Schools Category

Date: March 2, 2023

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 is pleased to respond to the IPA's request for comments and firmly believes that further efforts can be made to optimize the Public Schools category. In the IPA's "Application Processing Update" released on February 6, 2023, Lightstar noted that the Public Schools category (schools) was undersubscribed with only three applications to the block.

This was not a big change from the December 14, 2021, block, which received just one public school project application during the reopening block period. In the Long-Term Plan, the IPA noted that this did not necessarily mean that there was little interest in the development of public schools projects, but rather might indicate that the market was still getting attuned to this new project category within the program and project applications were still being developed. However, a year later at the November 1st, 2022 block reopening, only three projects were submitted. In contrast, the Community-Driven Community Solar (CDCS) block was newly created alongside the schools category, yet over 60 projects applied for the CDCS block.

It is now clear that there may be aspects of the program design with the schools category that developers find difficult to navigate. For the success of the schools bucket, Lightstar believes that the requirements must be feasible and fine-tuned to garner participation in the category. It is imperative that the schools category is successful because the intention of the program was to promote clean energy access to schools, particularly in environmental justice communities.

To optimize the schools category and increase its participation, Lightstar recommends the following:

1. **Define the term “adjacent” and introduce an equitable proximity exception.** To qualify for the schools category, projects must be developed “on or adjacent” to public school land or district-owned land. The 2022 Long-Term Plan states that “community solar projects developed on land adjacent to a public school or on school district-owned land are eligible to participate in this category.” Lightstar proposes adding two proximity exceptions to the “adjacent” definition for schools where adjacent development may be impossible or impractical due to land constraints or interconnection viability.

Should this be the case, as a part of the project application, approved vendors must establish how they will provide access to and from the project for the school staff and students. Students and staff may desire to regularly visit the project for learning purposes. Additionally, this flexibility in the proximity rule will not impact the subscription requirement for the category.

- a. **Allow for projects to be sited further for schools in densely populated areas.** The public schools that stand to financially benefit the most from subscribing to a project are primarily located in low-income and environmental justice communities in urban areas. However, trying to find land (school-district owned or otherwise) to develop around public schools, particularly those in Chicago and other densely populated areas has proven onerous. From land availability to interconnection cost-prohibitions, it is a narrow set of opportunities that often leave schools in densely populated areas unable to benefit from the program. As such, it is important for the category to be flexible in the proximity of projects to public schools. We further propose that schools in designated urban areas, [as determined by the US Census](#), be allowed to partner with a community solar project within a 20 mile radius.

- b. **Allow for rural schools to participate in projects within the same district.** We propose that rural, [as defines by the US Census designation](#), schools where adjacent development may be impossible, due to ineligible land or interconnection viability, be allowed to partner with a project that is within the same school district. We believe that this flexibility will allow *all* schools, regardless of location, to more equitably benefit from Community Solar.
2. **Promote innovation.** *Show preference for innovative dual-use model such as community gardens and urban farming* – An exciting emerging model of community solar is the dual-use/agrivoltaics model where solar + agriculture are combined on the same plot of land. Lightstar is leading on this farm-centered and cost-effective deployment of community solar in other states with decarbonization goals and land-use concerns similar to Illinois. Incentivizing an innovative concept such as dual-use will provide additional community benefits in food access, gardening skills and after-school activities for students.

The CDCS is quite innovative in program design. The requirements accept indirect and direct community benefits to range from bill savings to revenues from project ownership to cultural and environmental benefits. This encourages project applications to leverage different resources and employ an innovative “out-of-the box” approach to promoting community benefits. It is no wonder that the CDCS category was oversubscribed. Another illustration of this innovative approach was noted in the LMI bonus credit section of the US Department of Treasury’s recently [released IRA guidelines](#). In the guidelines, the federal government suggests that projects will be prioritized that provide more “substantial benefits” than financial benefits to communities. As such, the schools category should be expanded to promote more than subscriptions as a community benefit, such as agrivoltaics and other partnerships.

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In conclusion, the public schools category is a newer subset of the Adjustable Block Program but unlike other new categories, it has not seen high-levels of participation. For the schools category to practically work, it must be designed to be economically, locationally and financially feasible. This can be achieved by encouraging innovation and increasing flexibility in where projects can be located in relation to the public school, particularly those constrained by land and may need the benefits of clean energy most.

Lightstar would like to thank the IPA for carefully considering these requests. Should the Agency have any questions or need clarification on any of these items, Lightstar can be reached at [REDACTED].

Sincerely,

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