



Illinois Power Agency
Illinois Shines Program Administrator
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RE: 2024–25 Program Guidebook Feedback

April 11, 2024

Lightstar Renewables, LLC (“Lightstar”, Illinois Shines Approved Vendor #1101) appreciates the opportunity to provide feedback on the draft changes to the 2024–2025 Illinois Shines Program Guidebook. Lightstar recognizes the due date for comments was March 27, 2024, and apologizes for this late submission due to key staff being out of the office during the short comment window. We hope the following comments can be considered as the Agency finalizes the 2024–2025 Program Guidebook in the interest of advancing the IL Shines Program goals.

On page 174 of the draft Program Guidebook that the IPA provided for comments, Lightstar would like to comment on the following footnote (Footnote 311) related to agrivoltaics (AgPV) and Part II applications:

“311 Projects utilizing crop-based agrivoltaics should not submit the project’s Part II application until the crops are planted and documentation of adherence to commitment to utilize agrivoltaics can be proved. Approved Vendors will be asked to prove the progress of planted crops and/or other agrivoltaics activities in the Part II application.”

Lightstar is a forward-thinking developer, and as such, the company has committed to providing additional value to many of our solar projects in Illinois by incorporating agrivoltaics. Lightstar appreciates the IPA’s recognition of the dual benefits AgPV provides through local food production and clean energy generation by including AgPV in the project scoring for the Traditional Community Solar (TCS) block. However, the proposed footnote highlighted above has the potential to create significant problems for AgPV projects through delayed REC incentive payments. At a high level, our recommendation is for the IPA to allow a year for crops to be established, and in that year the array can be generating electricity and should receive RECs while demonstrating agriculturally relevant activity.

Lightstar interprets Footnote 311 as restricting the ability of an Approved Vendor to receive REC incentive payments until Part II Applications are approved. This would require crops at facilities that secured points for AgPV to be planted and progress toward AgPV commitment to be “proved.” Lightstar has consulted with experienced AgPV experts and determined this requirement may be problematic due to a variety of factors that affect crop planting schedules. We outline these potential problems below and note these have the potential to apply to all AgPV projects with the exception of those solely growing hay:

1. Lightstar makes every effort to minimize land disruption and damage during project construction. However, if there may be unavoidable disturbance to soil during construction, planting crops within the first year (to comply with Part II Application requirements) could be setting the solar farm up for a challenging time managing soil health and weed pressure in the first year, which can then spread onward into the future. It could be more challenging if land not already in production is switching to vegetables depending on soil fertility and conditions. Therefore, delaying or modifying planting in the interest of long-term sustainability of the AgPV project may impact our ability to comply with Part II Application requirements and thus delay REC incentive payments. Typically, though in some states and projects it differs, cover cropping is necessary to reestablish soil stability before planting crops. Although, on its face, this is not revenue creating agricultural activity, it is important to save revenue and costs down the road for the farmers. Therefore, the Program Guidebook should allow a year for crops to be established, and in that year, the array can be generating electricity and receive RECs while demonstrating agriculturally relevant activity.
2. If the project site was an existing vegetable farm and if construction wrapped up in the summer, it may be possible to plant a late season vegetable crop, but likely the best move would be to plant a cover crop and implement the full growing season the following year. Therefore, if there are unavoidable construction delays, planting may have to be adjusted, which would impact our ability to comply with Part II Application requirements and thus delay REC incentive payments.
3. If the land was originally in hay production and switching to vegetables, it would be best to leave the grass (i.e. do not grade) for construction to avoid compaction and erosion. Then, work can begin on incorporating the sod and planting vegetables when construction is finished. Transitioning hay land to vegetable production in spring is very challenging if the weather is too wet. The sod makes the soil take longer to dry out, and it can be very clumpy, which is not ideal for small-seed crops or sensitive

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transplants. This scenario could require an additional project timeline of 6 months to a year if transitioning from hay to vegetables, extending the time by which Lightstar could submit a Part II Application and qualify for REC payments. This also impacts the timing of payments to the farmer. The alternative is to work on incorporating the sod before construction, but that would increase compaction, weed pressure, and risk of erosion during construction and the first growing season, reflecting the same potentially long-term negative consequences as Item 1, above.

Due to these potential challenges, Lightstar recommends the IPA recognize the phrase in Footnote 311 "until crops are planted" as including cover crops or other fast-growing crops that can help stabilize the soil and prepare the site for long-term production after construction. Under this, Lightstar would recommend the Part II Application submission requirements include a description of the need for the cover crop as a bridge toward full production crops in the future. Lightstar also recommends the IPA amend the language in Footnote 311 to read "*...until crops are planted **OR** documentation of adherence to commitment to utilize agrivoltaics can be proved.*" As part of this change, an Approved Vendor could submit documentation outlining the need to allow the land to rest or re-set post construction pre-planting to ensure long-term viability. This would prevent the arbitrary delay of REC incentive payments due to technicality.

As an additional item, Lightstar would like to take this opportunity to reiterate a related challenge between AgPV and incorporating pollinator habitat (and, thus, qualifying for scoring points in both categories). Currently, AV's who may seek to incorporate pollinator habitat into AgPV projects within the program, are prevented from doing so, as the state Solar Siting Pollinator Scorecard (Scorecard) dramatically penalizes use of insecticides (often required at some level for significant food production, even if organic in composition), which results in projects unable to qualify as "pollinator friendly." This challenge has been discussed with the Illinois Department of Natural Resources Office of Resource Conservation, who as of January 2024, have declined to make revisions to the Scorecard.

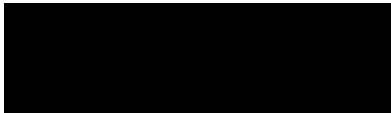
Lightstar sees this as a missed opportunity to expand the combination of pollinator habitat and food production within solar projects, a mutually beneficial arrangement, as pollinators are often crucial for production yields. Lightstar's corporate partner, American Farmland Trust (AFT), which advocates for smart solar siting, also recognizes this challenge and has worked with us to advocate for a solution. TCS sites can be designed to incorporate beneficial pollinator habitat that are minimally, if at all, affected by targeted pesticides in other areas of the array. The current Pollinator Scorecard does not distinguish between broad application of pesticides or targeted use. The unintended consequence of utilizing the scorecard without

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exception is that practically, the only application of both pollinator and agPV is hay production. This pigeon-holes participating farmers into a single crop. Lightstar encourages the IPA to consider an exception to allow AgPV projects to also receive points for pollinator habitat and include this exception within the updated Program Guidebook. Lightstar is happy to convene AFT and IPA to craft appropriate exception language.

Thank you again for the opportunity to provide this feedback and we reiterate our apologies for the lateness. Please feel free to contact me with any questions.

Sincerely,



Brianna Fiorillo
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