

Trajectory Energy Partners, LLC  
P.O. Box 310  
Highland Park, IL 60035

October 26<sup>th</sup>, 2021

To: Illinois Power Agency  
Re: Proposed Approach to Community-Driven Community Solar Request for Stakeholder Feedback dated October 20, 2021

Trajectory Energy Partners, LLC (“Trajectory”) appreciates the opportunity to comment on the Proposed Approach to Community-Driven Community Solar.

Responses to specific questions:

- 2. How should the Agency define community group for this selection process? Should the Agency use the definition of community-based organization used for the Illinois Solar for All Program (see Section 8.6.2 of the current Long-Term Plan), or should a different standard be used?**

The Agency should use the definition of community-based organization used for the Illinois Solar for All as outlined in Section 8.6.2 of the current Long-Term Plan. This approach has worked well for ILSFA and is directly applicable to the community-driven community solar program.

- 3. The purpose of the point awarded to projects developed in response to a site-specific RFP is to demonstrate community engagement and involvement. Are there other ways community engagement and involvement could be demonstrated beyond a site-specific RFP? How could such engagement/involvement be verified?**

The use of a site-specific RFP to demonstrate community engagement creates a strong bias towards wealthier and more resourced communities, contrary to CEJA’s intent of expanding access to the benefits of community solar. Only local governments and community organizations with sufficient full-time staff, existing sustainability departments, or large consultant budgets have the resources to develop, issue, and manage an RFP for a community solar project.

The issue of verifying community engagement and involvement is one that has been successfully addressed in the Illinois Solar for All program by prioritizing community solar projects located on sites that are owned by entities providing critical services to local non-profit and public sector entities that can also serve as anchor subscribers to a project. This approach has been in place since the LTRRPP dated April 20, 2020. This has been translated into a point allocation system for the project selection protocol used for community solar projects in ILSFA:

Anchor Type	Anchor is a non-profit or public facility (NP/PF). The anchor institution must provide a Letter of Intent (LOI), and the anchor tenant subscription must be at least 10% of project size, and not more than 40% of project size.	2
Project host	Additional if the Anchor NP/PF is also the project host (PH)	0.75
Critical Service Provider	Additional if the Anchor NP/PF is also a critical service provider (CSP)	0.5

The Agency should apply this scoring approach to the community-driven community solar program which is both verifiable and captures the intent of the Climate and Equitable Jobs Act.

### **Length of Initial Application Window**

The proposed length of the initial application window of 180 days is too long. The Climate and Equitable Jobs Act made clear that certain sub-programs of the Adjustable Block Program were to open 90 days after the effective date of the law. For the community-driven community solar sub-program, the law specified that project selection for the initial block opening would be based on criteria published in the April 20, 2020 LTRRPP. These criteria were associated with a procurement plan that included a 60-day notice period and a 60-day window for project applications. Community groups, local government entities, and other interested parties had been aware of this program and preparing for it for over 18 months at this point. As a result of such a long application window, once the qualification and selection process has run, and the ICC has approved the REC Contracts, at least a year may have elapsed between the effective date of CEJA and the date the first REC Contract is executed for community-driven community solar. Delaying the awarding of REC Contracts by this length of time runs counter to the intent of the Climate and Equitable Jobs Act to begin this program quickly.



Respectfully submitted,

/s/ Jon Carson

Jon Carson  
Managing Partner  
Trajectory Energy Partners, LLC