



Trajectory Energy Partners, LLC  
P.O. Box 310  
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November 3<sup>rd</sup>, 2021

To: Illinois Power Agency

Re: **Public School Projects Category Request for Stakeholder Feedback**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the proposed approach to the Public Schools Projects Category as outlined in the Climate and Equitable Jobs Act. Trajectory supports the proposed approach as outlined in the October 14<sup>th</sup>, 2021 draft.

Responses to specific questions:

*A. Is the proposed 70% (35 MW) for schools categorized as Tier 1, Tier 2, and schools located within Environmental Justice communities and 30% (15 MW) for Tier 3 and Tier 4 schools appropriate? If a different split is proposed, please provide the reasoning behind that split.*

Yes, the 70%-30% split is appropriate. The Climate and Equitable Jobs Act clearly states that Tier 1 and Tier 2 schools and schools in Environmental Justice communities be prioritized. This approach meets that goal, while also allowing for other schools to participate.

*B. Are the prior year results of the annual Evidence-Based Funding Distribution process conducted by the Illinois State Board of Education an adequate and timely source to determine Tier 1 or Tier 2 status? Are there other ways to verify a school qualifies for the Tiers 1 and 2 and Environmental Justice Community categories?*

The combination of using the prior year’s results of the Evidence-Based Funding Distribution process for the Tier 1 and Tier 2 schools, along with including schools in Environmental Justice communities works well to meet the intent of the Climate and Equitable Jobs Act and provides clarity, ease of determination, and avoids unnecessary administrative burdens.



***C. Are the proposed size categories (< 250 kW, 250 kW to 1 MW, over 1 MW) appropriate and allocations to each category appropriate? If not, please suggest alternatives and explain the rationale behind the allocations proposed.***

Yes, these are appropriate categories to ensure funding for smaller systems will not be quickly utilized by larger projects. These size categories match the common categories used in other programs and reflect a reasonable distribution of system sizes.

***D. At this time, the Agency is not proposing specific allocations between projects in Group A or Group B, nor does the Agency propose a specific allocation for community solar projects located at public schools. The Agency expects that such allocations may be proposed in the next Long-Term Plan. In this interim period, should specific allocations be made to groups or to community solar projects?***

The proposed approach is appropriate for the initial window opening. The projects proposed and built during this interim period will provide useful data on the distribution of projects by geography and type, in the event course corrections are appropriate for future procurements. This approach already creates 6 separate funding buckets, and further dividing of the capacity allocation would over-complicate the initial block opening.

Respectfully submitted,

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