

September 9, 2022

Trajectory Energy Partners, LLC  
P.O. Box 310  
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To: Illinois Power Agency  
[IPA.Solar@illinois.gov](mailto:IPA.Solar@illinois.gov)

Re: Traditional Community Solar Project Selection Strawman Proposal Request for Stakeholder Feedback

Trajectory Energy Partners, LLC (“Trajectory”) appreciates the opportunity to comment on the proposed Traditional Community Solar Project Selection Strawman Proposal.

In general, Trajectory strongly supports the proposed approach, and believes it will result in selecting projects that meet the policy goals of the Climate and Equitable Jobs Act for the Traditional Community Solar project category.

Trajectory responses to specific items in the proposal:

***1. Proposed minimum point threshold for waitlist acceptance – 5 points***

Trajectory strongly supports the minimum point threshold of 5 points to remain on the waitlist. This policy is consistent with the ICC Final Order and will ensure that only viable projects that meet the policy goals of CEJA will be waitlisted for future year capacity, and prevent marginal projects from receiving funding simply based on early application into the program.

***2. 1(a) - Sited on “disturbed land” as defined by United States Geological Survey***

- a. Trajectory recommends that the IPA approve a map of “disturbed” and “contaminated” areas and allow for a process to amend the map similar to the EJ designation process under IL Solar for All. Without such a map, the Program Administrator will face the enormous administrative burden and bottleneck of adjudicating this determination on a project-by-project basis.

***3. 1(c) – Commitment to utilize agrivoltaics or dual use solar.***

- a. Trajectory supports the inclusion of livestock as a form of agrivoltaics. Key points to consider:
  - i. Livestock grazing under solar is an established practice in other locations that should be encouraged in Illinois.
  - ii. Livestock grazing at community solar projects across the state of Illinois will be a strong positive factor in gaining local support for these projects and play an important role in the future of solar in Illinois.
  - iii. Avoiding the use of gasoline driven lawnmowers by maintaining solar sites through livestock grazing has the additional positive impact of reducing greenhouse gas emissions associated with solar operations and maintenance.
- b. 75% of project site to be used for Agrivoltaics – Trajectory supports this threshold. A 75% threshold allows for some sensitive equipment to be kept back from dual use areas, while



ensuring that there is no gaming of this requirement by only planting a small garden in a portion of a setback area. This metric will also be straightforward to verify at Part 2 application as well.

- c. Verifying viability of commitment to agrivoltaics. Trajectory supports requiring a contractual commitment in order to demonstrate the viability of agrivoltaic commitments.

4. ***2(c) – Sufficiency of Project Application Reports for Information on a County or Township without a community solar project***

- a. Trajectory supports the IPA position that existing public information is sufficient for approved vendors to determine if other previously approved projects exist in a given county. If a project indicates in its application that a project earns these two points, the IPA can verify this information for that County or Township.

5. ***4. – Interconnection Points***

Trajectory supports the proposed IPA scoring system for interconnection.

- a. Prioritizing projects in first or second position on a substation will result in the most viable projects being selected.
- b. The scoring system for recency of interconnection agreement is an appropriate tie breaker for projects having an equal score in all other aspects. The IPA's proposal to keep this particular criterion at 1 point or less is the right approach, and this particular criterion should not be increased above 1 point.

Respectfully submitted,

/s/ Jon Carson  
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Trajectory Energy Partners, LLC