



March 3, 2023

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

Re: Illinois Shines (Adjustable Block Program) Stakeholder Feedback Request – Public Schools Category

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on request for feedback for the Public Schools Category.

Land Ownership Requirements

If land where a project participating in the Public Schools category is sited is sold to an entity that is not a public school or public school district, the Agency should only allow such a project to continue to remain under contract and deliver Renewable Energy Credits only under certain limited circumstances. These circumstances may include situations where the participating school district is closed or consolidated with a different school district. In either situation the original school board would no longer be making decisions about the land in question, and the disposition of the solar project did not drive the original school board’s decision-making about the disposition of the land.

If such a circumstance occurs, and the disposition of the land on which the project is sited is not in control of the project owner, the project could be required to retain another public school as the anchor subscriber to the project, and be allowed to switch the anchor subscription to any other public school in the utility service territory.

These allowances should be reviewed on a case-by-case basis, and if approved, the Agency should allow for the land to be sold to another public school and the anchor subscription transferred without any penalty or change in the REC contract delivery payments. By limiting these waivers to circumstances where the previous school district is closed or consolidated, there should not be a time parameter set on when these waivers are provided, as long as the circumstances were out of the control of the project because of a closing or consolidation of the school district.

Anchor Tenant Requirement

The Agency should not allow waivers on the anchor subscription requirement in the first year of the REC contract for a Public School community solar project. At the time of application, a school should be able to reasonably project its electric demand for at least the first year. As electricity demand changes at the public school following the first year, the



Agency should allow waivers in connection with the transfer of shares of the anchor subscription to another public school, so long as the project maintains at least 10% of the system subscribed with qualifying public schools in the utility service territory. In addition, in light of the potential for school downsizing in certain areas of the state, if a school no longer has sufficient demand to meet the required 10% of system production, the Agency should allow waivers for such insufficient demand, perhaps with the requirement that the school is subscribing for the entirety of their existing demand.

Components of the Waiver

We recommend the following edits and clarifications:

1(ii). Percentage of the project that the public school will subscribe to should waiver be granted (should be within 10-40% range as outlined in the Long-Term Plan):

The reason for a waiver would be that the original public school can no longer maintain the minimum 10% subscription. Therefore, in the waiver the original public school should list what percentage it will still maintain, and the waiver should list a public school in the same utility service territory that will replace the lost subscription capacity to maintain at least 10% with a public school.

1(iv). Type of subscribers that will be used to backfill the subscription amount that the public school is diminishing their subscription by:

At least 10% of the subscriptions should be with public schools in the same utility service territory, unless the original anchor subscriber no longer has sufficient demand to meet the 10% minimum.

Respectfully submitted,

Jon Carson
Managing Partner
Trajectory Energy Partners, LLC

