



April 3, 2023

Trajectory Energy Partners, LLC
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Re: Illinois Shines Program Guidebook

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the draft Illinois Shines Program Guidebook dated March 14, 2023 (the “Draft Guidebook”). We are generally supportive of the Draft Guidebook revisions, and offer the following comments:

Interconnection and Waitlist Procedure

Trajectory supports the current procedure and the language in Section 1 (G) of the Draft Guidebook, which provides that any project required to have a valid interconnection agreement that has exited the interconnection queue must provide proof of re-application for interconnection. We believe the current language is significantly preferable to any alternative proposals to this procedure, including proposals that would remove projects from the waitlist if a project has had its interconnection agreement expire. The Traditional Community Solar program structure anticipates a project waitlist that necessarily spans a period of time far in excess of the average time period that an interconnection agreement may be valid. Such a retroactive policy change would subvert program participant planning and expectations, and create unnecessary uncertainty for waitlisted projects. In addition, it would create significant additional administrative burden on the Program Administrator in managing the waitlist and reviewing additional project applications that would result from such a policy. As a result, Trajectory supports the current waitlist process in Section 1(G).

Site Control

Trajectory is concerned that Draft Guidebook includes an additional requirement that may seem innocuous, but will create significant operational and financing issues for project developers, new burdens on the Program Administrator and unnecessary difficulties for site hosts. Solar project finance typically requires that a project company is party to the site lease. Under the ABP, that project company is typically a subsidiary of the Approved Vendor. Instating this Approved Vendor signature requirement would not change the obligations of Approved Vendors to comply with program requirements, but would result in significant barriers to financing and burdensome workarounds for all parties involved. Every single project developer may be forced to create a new Approved Vendor for every single project that will apply into the Adjustable Block Program, which would create an incredible compliance and administrative burden for developers, the Program Administrator, and the IPA. Trajectory took this approach in the earliest days of the Adjustable Block Program prior to corrective revisions allowing



assignment of the REC contract, and – simply put – it was an enormous headache for everyone involved, and we are still working with the Program Administrator to clear out these

Trajectory suggests that this requirement be removed, and in the alternative, that the requirement be extended to include affiliates of the Approved Vendor. However, given the difficulties with first defining and then demonstrating affiliate status, we believe it would be far preferable to forego this new requirement.

Part I Project Design

Section 1(G) of the Draft Guidebook contains a new requirement that does not seem appropriate to Community Solar: that if the site map changes between site control and the Part I application, a new customer signature will be required. Site control documentation necessarily occurs takes place before specific designs are completed, and those designs are appropriately updated later in the project development process. Requiring a new signature creates a new burden on the program participants, including site hosts (who, if they are the “customer” intended in the new requirement) will be reasonably confused as to why another signature is requested, when the site control documentation allows for revision of site design prior to construction, and from the perspective of the Program, when site design revisions are allowed prior to the Part II submission. Note that this addition is also reflected in the list of Part I requirements on Page 70 of the Draft Guidebook, and we would recommend that both additions be removed.

Respectfully submitted,

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