



February 28<sup>th</sup>, 2022

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**Re: 2022 Long-Term Renewable Resources Procurement Plan**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the 2022 Long-Term Renewable Resources Procurement Plan. Trajectory is broadly supportive of the comments provided by the Illinois Solar For All Working Group and the Joint Solar Parties. We provide specific comments below on a few particular subjects below:

**7.4.3 Traditional Community Solar**

Trajectory supports the “same day” definition of “submitted at the same time.” No matter when the IPA opens the application window for new Traditional Community Solar projects, there will be a large number of projects submitted. Considering applications submitted on the same day as “submitted at the same time” is a common-sense interpretation of the goals of the legislation and will reduce the potential for technical submission issues caused by using shorter timeframes.

Trajectory also supports the utilization of a scoring system to rank projects that are submitted on the same day. Alternative proposal to rank projects by arbitrary project attributes such as date of interconnection would only serve to benefit specific Approved Vendors and would fail to achieve the other policy goals of CEJA.

Trajectory supports the scoring system as outlined in the draft LTRRPP. We offer a few suggestions to clarify the intent of the scoring criteria proposal, and suggest one additional proposed criterion (#7). Proposed additions for purposes of clarifications are underlined below.

1. Projects that are sited on brownfields. (3 points)
2. Projects that are committed to agriculturally-sensitive provisions, such as providing a pollinator friendly habitat. (2 points)
3. Projects that increase the geographic diversity of community solar by being located in a county or township that does not contain other approved community solar projects. Absence of any approved projects in a Township or county is determined at the time of application and defined as any project with an ICC approved REC contract. Any project located in a township or county without a project with an ICC approved REC contract, previously approved project will receive points regardless of how many projects apply in a given Township or County at the same time. (2 points)

4. Projects submitted by equity eligible contractors (2 points) or that can demonstrate contractual commitments for at least 50% of project development work to be performed by eligible equitable contractors (1 point).
5. Projects that commit to 100% of projects subscriptions being met through small subscribers (below 25 kW). (1 point)
6. Project applications that were eligible for inclusion in the blocks of capacity that opened in December 2021 (e.g., were on waitlists as of December 31, 2020) Only Projects applying at or below their original capacity size will be awarded points. (2 points).
7. Projects for which the land is owned by a non-profit or public sector entity. (2 points)

Regarding #6 – Trajectory supports the clarification that points are awarded only for projects resubmitted at their original capacity instead of at a larger size. Increasing a project from 2MWac to 5MWac requires updated site control documentation, new zoning approvals, and a different interconnection agreement. By definition this would constitute a different project than the original application. Awarding points to projects at their original capacity on the initial waitlist will prioritize more mature projects and reflect the legislative intent. Developers who wish to upsize their projects can do so, but they may not do so and receiving additional priority.

Regarding #7 – Awarding points to projects sited on land owned by non-profits or public sector entities will help increase the direct benefits to Illinois residents.

Trajectory strongly encourages the IPA to include in the LTRRPP the procedures for random selection if tie breaking is necessary after points are awarded. No matter when the initial application window is opened, it is a near certainty that there will be a high volume of applications, and providing certainty in short order for developers will ease concerns over long-term uncertainty. In particular, Trajectory recommends that the IPA consider using the existing and successful protocol under the Illinois Solar for All program to facilitate random selection in the event that a tie breaker is needed.

#### 7.9.1 Technical System Requirements

Trajectory suggests a clarification on the requirement for interconnection. Suggested additional language underlined below:

- For systems over 25kw, an Interconnection Agreement signed by both the interconnecting utility and the interconnecting customer. At the time of project application, this Interconnection Agreement must be valid. If a deposit was required for the continued validity of the interconnection agreement, that deposit must have been placed. Expired Interconnection Agreements are not valid for purposes of project application.



#### 7.9.4 Co-Location of Community Renewable Generation Projects

Regarding the definition of “contiguous”, previous LTRRPP documents have clarified that “Additionally, parcels that are separated by a public road, a railroad, or other right of way accessible at all times to the general public are not contiguous.”

The new LTRRPP should clarify parcels separated by a public road, railroad, or other right of way accessible at all times to the general public are contiguous or not.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Jon Carson'.

Jon Carson

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