



June 29, 2023

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**Re: 2024 Long-Term Renewable Resources Procurement Plan – Chapter 7**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the questions posted by the IPA in preparation for the draft 2024 Long-Term Renewable Resources Procurement Plan. We offer the following comments:

**Chapter 7, Topic 2**

**CS Small Subscriber Limit at 25kW Across All Projects in the Program**

Question 1, *“What are other ways that the IPA can ensure compliance with the statute?”*

Trajectory believes that the statute is clear that a single account is permitted to have more than one individual 25kW subscription, so long as the subscriptions are not to the same individual project. The statute appropriately allows individual customers to choose to subscribe to more than one project, which ensures that customers have the flexibility to subscribe to projects sufficient to meet their electricity demand.

Trajectory believes that adding an additional limit on subscriptions beyond that required under the statute would prevent individual customers from exercising their ability to support additional solar projects, and that compliance with statutory language simply requires that each project ensure each of its small subscribers is limited to 25 kW from a single account.

**Chapter 7, Topic 6**

**Public Schools Category Uptake**

Question 2, *“Are additional provisions needed to preserve (i.e., rollover) capacity in this category in future years? If yes, please explain why and the provisions that the Agency should utilize to increase participation in this category”*



Based on our experience with the long decision-making cycle typical of public schools, Trajectory supports holding back capacity in this category for future procurement years to ensure that Public Schools have the opportunity to carefully consider their participation in the program before the capacity is transferred to other categories.

## Chapter 7, Topic 13

**Question 1,** *“Should the Agency consider another approach to discourage the development of TCS projects on greenfields or land that is available for conservation? Please provide details on what approach the Agency might use to ensure development does not coincide with this type of land.”*

Trajectory does not believe the Agency should consider another approach to discourage the development of projects on greenfields. The current scoring system provides an additional point for projects that are not greenfield projects, which should be maintained. But the Conservation Opportunity Area concept was meant by the Illinois Department of Natural Resources as an area to focus future conservation efforts, not to restrict solar development in those areas. The Illinois General Assembly has clarified this point, and the Agency should follow this new law.

**Question 2,** *“Are there any changes that stakeholders can suggest that may reduce the administrative lift of scoring TCS projects, while still accomplishing the goal of differentiation between projects.”*

Trajectory suggests that one approach would be to identify existing maps issued by state or federal agencies for each of the geographic criteria in the scoring system, instead of relying on individual project documentation.

**Question 3,** *“Does the interconnection fractional point process provide enough differentiation between projects? Should this process be revamped at all? If so, please explain why.”*

Trajectory believes the Agency should consider a change in the point system for interconnection status in the next LTRRPP. Currently 1 point is given for a signed interconnection agreement, and 2 points are given if the project is first or second in queue on a given substation. While this approach had its merits earlier in the program



as an indication of project validity, at this point a change is merited. There are many substations in Illinois that can support many more than 2 community solar projects, particularly in ComEd territory. The additional 2 points should be given under the following circumstances:

- Project has a signed interconnection agreement, and has placed the full deposit for the interconnection agreement with the utility at the time of Part 1 application. At the time of Part II application, the project should verify that the project remained in queue with its deposit placed until the time of construction.

*Question 5, "Please provide any other feedback on changes to the TCS scoring guidelines that might be relevant to ensuring that the multiple goals of TCS project development – encouraging solar development state-wide, best utilizing land in the state that cannot be otherwise utilized for conversation/farming/etc., and diversifying project attributes amongst TCS projects."*

Trajectory believes current scoring guidelines should all be retained. The scoring criteria for attributes such as public sector/non-profit ownership, located in EJ and R3 communities, and prioritizing projects in new counties or townships, etc. are all helpful to reach the goal of diversifying project attributes among TCS projects.

Respectfully submitted,

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