

June 11, 2025

Via email

Illinois Power Agency
Attn: 2026 Long-Term Renewable Resources Plan Stakeholder Feedback
105 W. Madison St., Suite 1401
Chicago, IL 60602

Re: Comments on Topic #2 – Community-Driven Community Solar (CDCS) Developer Cap

Dear Illinois Power Agency,

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on Topic #2 of the May 19, 2025 stakeholder questions for Chapter 7 of the forthcoming Long-Term Renewable Resources Procurement Plan (“LTRPP”), specifically as it relates to the idea of a developer-level cap for the CDCS Category. For the reasons outlined below, we respectfully oppose establishing a developer-level cap for the CDCS category.

TOPIC 2: Community-Driven Community Solar (CDCS) Developer Cap

Questions:

1. *Given the information above, and assuming the Group A and Group B block sizes will remain fairly consistent with the 2024 Long-Term Plan, what are the advantages and risks of establishing a developer cap process for CDCS consistent with the other categories?*

Implementing a developer cap for CDCS category risks undermining the impact of the category. The CDCS program is designed to reward projects that demonstrably serve their host communities through a variety of scored categories, including local subscription and workforce commitments, alongside partnerships with local non-profit entities. Therefore, and as intended by the General Assembly and implemented by the IPA, the diversity within the CDCS project category is realized at the project level, not by the number of developers who receive REC awards for CDCS projects.

The question provided data on the results of the 2024 procurement, which demonstrate that every qualifying project that applied was accepted into the program for this program year. Thus every Approved Vendor that submitted a qualifying CDCS project was granted a REC Contract for each of their qualifying projects. The data do not appear to identify an issue that needs to be resolved in order to effectively ensure the delivery of the benefits of the CDCS program to host communities.

CDCS projects require extensive local organizing, including local outreach and development of agreements to deliver community benefits. Approved Vendors that develop successful approaches can deliver more benefits on a project-by-project basis, and are more likely to ultimately deliver on those benefits with a completed project. Given the already modest size of the CDCS procurement, further limiting developers to a small handful of projects a year will mean that each project has a greater risk of not ultimately delivering on the promised community benefits and would disincentivize the development of the specialized outreach and engagement strategies necessary to successfully complete a CDCS project.

Finally, the project scoring rubric sorts projects based on the extent to which they accomplish the goals of the CDC S program. A developer cap could therefore result in the selection of lower scoring projects that deliver fewer benefits to their communities being selected over projects that deliver more benefits in line with the goals of the program.

2. *If a developer cap process for CDCS is appropriate, should the threshold be set at 20% or is there an alternative percentage that should be considered? Please provide any reasoning to support a different percentage level, if possible.*

We do not believe a developer cap for the CDCS category is appropriate. We urge the IPA to maintain the current, merit-based approach and focus instead on scaling CDCS capacity and sharing best practices so that more qualified projects — from any Approved Vendor — can succeed.

Respectfully submitted,

Josh Bushinsky

Partner

Trajectory Energy Partners