



June 29, 2023

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**Re: 2024 Long-Term Renewable Resources Procurement Plan – Chapter 8**

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 8, Topic 4  
ILSFA Community Solar Subscription Sizing**

Question 1, *“should Community Solar subscribers be allowed to subscribe to a greater number of kWh than anticipated usage,”*

Trajectory strongly believes that yes, ILSFA Community Solar subscribers should be allowed to subscribe to a greater number of kWhs than anticipated usage. The changes to net-metering in Public Act 102-0662 were intentional to increase the impact of community solar subscriptions, by allowing a subscriber to impact their delivery and other electricity usage costs, and this benefit should not be restricted for low-income subscribers participating in Illinois Solar for All community solar projects.

For low-income families participating in Illinois Solar for All community solar projects, limiting their subscriptions to their last year’s usage ultimately means that the total savings on their utility bills are in the range of 20%. By allowing them to subscribe to a larger subscription size, this overall saving can increase to 40% or higher. The “time-tax” of participating in IL Solar for All is a heavy one, and most truly low-income families do not have the bandwidth to participate in the extensive paperwork exercise that is required for IL Solar for All, and it is not worth it to them for a 20% or less savings. Instead, subscriptions are often focused on retirees, who qualify as low-income based on their annual income, and have more time available. These retirees are deserving participants, but the families who are often thought of as the true targets of



this program are much more involved and better served when the individual subscriber savings are higher.

While it is a valid point to look at the tradeoff between serving more low-income subscribers vs. less with a higher savings, given the very limited nature of the funding for these projects, and the fact that far under 1% of low-income residents in Illinois are ever going to be a part of IL Solar for All, focusing on more deeply impacting a slightly smaller number of customers is the right choice.

Given the broad state and federal efforts to electrify home cooking, heating, and transportation, and the associated federal tax incentives and rebates that are specifically directed towards low-income households, subscribers may reasonably expect that their electricity demand will grow in the coming months and years, and size their subscriptions accordingly. The current limit would prevent subscribers from anticipating their future subscription needs.

Respectfully submitted,

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