



July 19, 2019

Trajectory Energy Partners, LLC
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Re: 2019 Long-Term Renewable Resources Procurement Plan Update

Trajectory Energy Partners appreciates the opportunity to provide comments on the 2019 Long-Term Renewable Resources Procurement Plan Update released for review on July 3, 2019.

Trajectory Energy Partners has comments and suggestions on the following item:

B. June 20, Afternoon Session: Illinois Solar for All

4. **Anchor tenants.** A low-income community solar project may have a single anchor tenant which currently must be identified at the time of project application and may be later changed. Another approach to interpreting the statutory idea of an anchor tenant would be to have the anchor tenant not just be identified at the time of project application, but also serve as the host of the community solar project. This could help to ensure that low-income community solar projects are more closely tied to their community by being located in the same area as the intended subscribers. Would this be an appropriate refinement of the definition of anchor tenant? What other approaches could be taken to help ensure that ILSFA community solar projects demonstrate strong community involvement, engagement, or support?

Trajectory supports the intent of the proposal to have the anchor tenant for a low-income community solar project also serve as the host of the community solar project. However, to ensure that the outcome matches the intent of strong community involvement and ties to the community, we provide the following suggestions:

By itself, requiring that the site host also serve as an anchor subscriber would not accomplish the goal of projects more closely tied to their community. Nearly any landowner could also serve as an anchor subscriber whether they are a residential electricity customer living in the same service territory as the site, a corporation, or business, especially as there is no minimum size for an anchor subscriber. As an

example, if the requirement simply stated that “the anchor tenant not just be identified at the time of project application, but also serve as the host of the community solar project” this could be met by an absentee landowner living anywhere in the same distribution service territory signing up as an anchor subscriber on the project, even if they are just a residential electricity customer and not connected to the community where the project is sited. To achieve the goal of selecting projects with deeper community involvement and community ties, it is important that this requirement be one part of a larger set of criteria.

In the existing project selection protocol, an extra point is given if the anchor subscriber is a non-profit or public entity. We believe this focus on non-profit or public sector entities is important, and is the key to closer community ties. Having a non-profit or public sector site host that also serves as the anchor subscriber is the best way to ensure closer community ties and community engagement.

We propose the following approach to ensure the intended outcome:

Incorporate the site host/anchor subscriber connection into existing project selection protocol scoring:

- a. Add additional points for the site host also serving as the anchor subscriber.
- b. Add additional points for the site host being a non-profit or public sector entity.
- c. Retain the points for the anchor subscriber being a non-profit or public sector entity.

Because only the highest scoring projects are likely to receive funding, this approach would result in nearly all projects selected having non-profit or public sector site hosts that also serve as the anchor subscriber. These are all facts knowable at the time of the application, and will result in projects with closer ties to their community and subscribers in the project area.

If instead, the IPA believes it is important to establish the connection between site hosts and anchor subscribers as a requirement, we believe it would be important to also require that they are non-profit or public sector entities.