

January 7, 2018

Trajectory Energy Partners, LLC
P.O. Box 310
Highland Park, IL 60035

Re: Illinois Solar For All - Approved Vendor Registration Process

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the proposed Approved Vendor registration assessment criteria, and the thoughtful work that has gone into preparing the proposed assessment approach. Trajectory generally supports the assessment approach proposed by the Program Administrator and offers the follow feedback in response to the questions posed by the Program Administrator below. Please note that our comments throughout are focused on the community solar portion of the Illinois Solar for All program, although some of our comments are applicable more broadly.

1. *Are there any perceived barriers or concerns with the proposed two-stage registration process; i.e. first qualifying for the Adjustable Block Program, then registering for IL Solar for All?*

Based on our experience with the Approved Vendor process for the Adjustable Block Program, we believe the two-stage registration process will not be held up by requiring initial qualification with the Adjustable Block Program.

2. *Will the online portal approach streamline or complicate the registration process?*

As above, the online portal approach current in use for the Adjustable Block Program appears to have functioned appropriately thus far, and should provide transparency for applicants.

3. *Does the proposed Approved Vendor registration assessment rubric approach allow for the right level of detail and expectation?*

The proposed approach appropriately identifies the required criteria for assessment, and ensures that applicants will provide the necessary information for evaluation by the Program Administrator. As detailed below, however, the rubric provides too much room for, and weighting towards, submitting detailed plans that may not be carried out, or carried out in partial performance of what is promised. The rubric should provide additional focus on applications demonstrating that they have met or are in the processes of the obligations and spirit of the Future Energy Jobs Act and Illinois Solar For All.

4. *The administrator evaluated several methods for developing assessment criteria for individual registration questions, including 1) binary, pass/fail, 2) a weighted score and 3) a rubric approach. Are there other assessment methods not accounted for here?*

5. *Are the category weights used in the proposed rubric appropriate?*

The proposed rubric too heavily weights plans for outreach and engagement, disadvantaging participants who have made significant efforts to advance Illinois Solar for All projects in specific communities. While the rubric and other materials provided by the Program Administrator have only been available for the past month, the requirements of FEJA as they pertain to Illinois Solar for All have been law in the state for two years, and have been set forth in the Long-Term Renewable Resources Procurement Plan for over nine months, since its approval by the Illinois Commerce Commission on April 3, 2018. Potential participants in the Illinois Solar for All have long had notice about the program requirements for community targeting, outreach, and engagement. In addition, with the initial application window opening in April, and strong demonstrated interest in FEJA broadly, as well as Illinois Solar for All in particular, the Program Administrator should focus assessment of both Approved Vendors and particular projects on the actual, demonstrated activities of the Approved Vendor, rather than the plans of the Approved Vendor. While Trajectory recognizes that this rubric is focused on Approved Vendor registration, we believe it is important to set a precedent that demonstrated efforts are prioritized over written proposals for outreach. The LTRRPP requires that “priority shall be given to projects that demonstrate meaningful involvement of low-income community members in designing the initial proposals”. If Approved Vendors have not yet demonstrated a commitment to abiding by the requirements of Illinois Solar for All, it seems too late for at least the initial Illinois Solar for All projects to be supported by the program in 2019. In addition, the rubric appears to put the onus on the Program Administrator to determine the likelihood of whether the Approved Vendor will complete their proposed outreach, as well as the likelihood that those outreach efforts are successful.

In short, the rubric prioritizes those applications that can successfully draft lengthy, detailed plans for outreach over those applications that reflect actual outreach and engagement efforts. At a minimum, rubric question 7(c) should be tripled in weight, or other sections adjusted downward accordingly, in order to ensure appropriate weight is given to demonstrated activities. In addition, the Program Administrator could require the submission of letters from partner community organizations.

6. *Is it realistic that Approved Vendors will know the communities they will target at the registration stage?*

If an Approved Vendor intends to apply for a community solar project in the initial program in April 2019, Approved Vendors should have identified targeted communities long before registration opens. Community solar project development is a process that takes anywhere from 18 months to multiple years even without specific community engagement

effort. In order to be successful, at the time of registration a community solar project should be in an advanced stage of community engagement, site diligence, engineering, zoning and other permitting, and business model development.

7. *Is it appropriate to weight the future engagement plan higher than past experience?*

Per our comments above, we do not believe it is appropriate to weight future engagement higher than either past experience or demonstrated engagement thus far. The process of drafting engagement plans is quite different than the process of successfully implementing an engagement plan, and adjusting said plan as circumstances change and communities learn about, engage with, and ultimately shift the direction of a proposed solar project.

8. *Is the “probability of meeting requirements” an appropriate measurement for the required responses to the Applicants proposed outreach and engagement plan?*

It is not clear how the Program Administrator could be expected to accurately predict the probability of meeting these requirements. The cost of failure will be high, as it will significantly delay another project that might have otherwise had the opportunity to move forward. The Program Administrator is in a much better position to evaluate evidence of current efforts, either at the Approved Vendor registration stage or in consideration of the actual project applications. Trajectory would recommend that the “probability of meeting requirements” be replaced with an assessment of the demonstrated internal resources, ongoing efforts, and existing community partnerships in order to more accurately determine whether the Applicant has a serious and achievable outreach and engagement plan.

9. *With what degree of accuracy can vendors project the ratio of low-income subscribers for community solar projects at registration? Is this an appropriate indicator to be measured?*

10. *Are the intended anchor types likely to be known at registration?*

11. *Is a three year plan for meeting job training requirements realistic at registration?*

12. *Is it more appropriate to ensure job training plans are detailed or realistic? Can these be appropriately measured at registration?*

Particularly for solar project developers who do not provide installation services (as anticipated by rubric question 15), it may be difficult to provide detailed or realistic job training plans, as these developers are not directly supervising or engaging in these services. In addition, it may be difficult for appropriately measure whether job training plans are detailed or realistic without specific input from organizations directly engaged in such efforts.

13. *What is the right level of detail for submitting proposed business models, including illustrating approaches to savings, no upfront costs and financing terms?*

14. *Attestations are required for minimum site suitability and for sharing resources with participants. Is this understood and appropriate?*

This attestation is appropriate, particularly to demonstrate compliance with both the spirit and letter of the Illinois Solar for All program, as well as to demonstrate the Approved Vendor's progress in project development.

15. *Is the minimum score requirement of at least 70% of total possible score realistic and appropriate considering the rubric?*

Respectfully submitted,

/s/ Josh Bushinsky

Josh Bushinsky

Partner

Trajectory Energy Partners, LLC

P.O. Box 310

Highland Park, IL 60035

jbushinsky@trajectoryenergy.com