



**CITY COUNCIL  
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**COMMITTEE MEMBERSHIPS**

**CHAIRWOMAN  
COMMITTEE ON WORKFORCE DEVELOPMENT**

Budget and Government Operations  
Committees and Rules  
Education and Child Development  
Ethics and Government Oversight  
Finance  
Health and Human Relations  
Special Events, Cultural Affairs, and Recreation  
Workforce Development

February 10, 2021

Ms. Anne Evens  
CEO  
Elevate Energy & Program Administrator  
Illinois Solar for All  
322 S. Green St., Suite 300  
Chicago, IL 60607

Dear Ms. Evens,

As the Illinois Solar for All program enters its fourth year, there are opportunities now before us to update and improve the Project Selection Protocol based on the lessons learned over the past three years. If we, as a state, seize the moment and implement these changes, more public agencies and people within the low income (LI) and environmental justice communities (EJC) for which ILSFA was created will benefit.

As the Alderwoman for the City of Chicago's 10<sup>th</sup> Ward, I am calling for adjusting the ILSFA scoring rubric to encourage more community solar projects in heavily LI and EJ communities. The data is unshakably clear the change is needed and would benefit urban historically underserved minority communities, such as I represent. Also, I advocate for a priority in the selection process for projects located on sites owned or controlled by public agencies as this may lead to economic gains for public agencies, repurposing of public sites, and ultimately benefits to constituents.

For example, only one ILSFA community solar project has been built in all of Cook County since the program began in 2018 despite Cook County's significant density and largest absolute numbers of LI and EJC households in the state. The solution is direct: Score projects higher based on LI and EJC household density within the county to encourage community solar projects to be built where more of the community lives. Furthermore, project sites located on publicly owned land may help the public agency improve their budget from the received lease revenues and make otherwise lower valued sites useful.

This important scoring adjustment would ensure that any community solar facility targeted for heavily concentrated LI or EJC areas has a higher likelihood of success without severely penalizing other projects. This change may even encourage more projects to be proposed in these areas as solar developers would be more willing to invest time in project scoping if there is a greater likelihood that the project could move forward with ILSFA funding.



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Although rate paying customers in LI and EJ communities have access to community solar anywhere within their utility's broad service territory, locating these projects that are intended to serve these communities work best when close to home including public sites.

Community solar facility construction can create jobs in the communities where the facilities are being built and generate lease revenues for public entity landowners. Densely populated LI and EJC areas of our state need jobs, especially in growing fields such as renewable energy development. With the projects visible and accessible, residents understand the community solar subscription model and cost-saving benefits. Community members will see the physical solar gardens through the course of their daily lives and understand where their subscription dollars are going.

While realigning the scoring rubric, there must also be a recognition of the potential higher costs of obtaining and preparing the land and sizing systems to fit in smaller irregular sized tracts in densely populated areas, such as Cook County. In the interest of equity, ILSFA should consider higher incentive payments based on certain community solar locations to compensate developers for the added cost to site solar in these deserving communities.

My sincere hope is that by modifying the scoring rubric, ILSFA demonstrates its commitment to the communities this program is designed to serve.

Sincerely,

A handwritten signature in cursive script that reads "Susan Sadlowski Garza".

10<sup>th</sup> Ward Alderwoman  
Susan Sadlowski Garza

**From:** Chris McDermott <cmcdermott@amp.energy>  
**Sent:** Tuesday, January 19, 2021 10:09 PM  
**To:** Illinois Solar Comments <comments@illinoisfa.com>  
**Subject:** Request for Comments on Project Selection Protocol

Amp respectfully submits the following comments in relation to the EJ and LI community selection criteria raised in the request for comments.

The community solar arrangement, where the project site is geographically different from the location of the project's subscribers, fundamentally calls into question the current approach to project selection based on EJ and LI communities.

Indeed, the presence of a project geographically located in an LI or EJ community does not guarantee direct project benefits to those communities. While the township encompassing those communities may benefit from property taxes associated with the community solar system, those benefits may not be passed to the LI and EJ communities within those townships. Many members of these communities do not own property and can therefore cannot benefit from any offset in property tax on their residences enabled by the tax revenues from the community solar system.

Without question, the biggest benefit to communities comes from the reduction in electricity prices from the community solar system relative to retail rates. Therefore, if the program policy objective truly is to create benefits for LI and EJ communities then the policy design should be focused on the location of the subscribers, not the location of the solar system.

We recommend removing the geographic criteria regarding the location of the solar system and replace it with criteria related to the location of the subscribers. For example, points could be awarded in the Project Selection Protocol for projects that commit to having a subscriber base – both residential and not for profit – located in the LI and EJ communities as they are geographically defined by ILSFA.

This approach would also be more consistent with emerging approaches surrounding low income community solar in states where community solar is advanced in scale such as New York and Massachusetts. We copy references to those programs for information and consideration.

Regards,



**Chris McDermott**  
Senior Director, US Markets & Strategy

M 201.956.3559

[cmcdermott@amp.energy](mailto:cmcdermott@amp.energy)  
[amp.energy](http://amp.energy)

**From:** Chad Tady <Chad.Tady@sunpower.com>

**Sent:** Tuesday, February 16, 2021 10:57 PM

**To:** Illinois Solar Comments <comments@illinoisfa.com>

**Cc:** Courtney Welch <Courtney.Welch@sunpower.com>; Jan Gudell <Jan.Gudell@elevateenergy.org>

**Subject:** IL SFA Selection Protocol Comments

Dear Program Team,

Thank you for soliciting feedback and considering potential improvements to the IL SFA PY4 Selection Protocol! While the Selection Protocol does capture a number of important elements to prioritize EJs and LI communities, we do not believe it goes far enough. Having a higher allocation of points for communities with a higher degree of impact may help further prioritize those communities impacted most. One factor which does not seem to be addressed in the Selection Protocols is adverse conditions of a site such as the presence of hazardous materials, brownfield characteristics, or existing features which cause blight on the community. Sites which have less viable present beneficial use due to past use caused conditions are often located in EJs and LI communities and may negatively impact the community's prosperity. To have a prioritization allocated to sites which convert otherwise low value property to host renewable energy should receive some incremental credit in the Selection Protocol as this enhances those EJs and LI communities which often are impacted by tarnished, abandoned, or hazardous properties. We kindly request the Program Team consider adopting a new category in the Selection Protocols which values projects located on sites with adverse site conditions caused by past use.

Best regards,

Chad Tady | Project Developer

2125 East Katella Avenue, # 220, Anaheim, CA 92806 | (312) 841-2423 | [Chad.Tady@sunpowercorp.com](mailto:Chad.Tady@sunpowercorp.com)

**SUNPOWER®**

**To:** Illinois Power Agency & Program Administration Team

**From:**

Central Road Energy LLC

Balance Solar LLC

YellowLite, Inc

Hawk-Attollo

SunVest Solar Inc.

StraightUp Solar LLC

**Date:** 2/16/2021

**Re:** Comments on Project Selection Protocols (2021)

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Dear Illinois Power Agency & Program Administration Team:

The signatories to this memorandum appreciate the considerable thought and effort the program administration team has put into developing and refining the Project Selection Protocol in the past program years. We are submitting this memorandum to register our support for the comments submitted by the Illinois Solar for All Working Group. We appreciate your consideration of our position.

**From:** Michelle Knox <marley2557@gmail.com>  
**Sent:** Wednesday, January 20, 2021 11:06 AM  
**To:** Illinois Solar Comments <comments@illinoissfa.com>  
**Subject:** EJ/LOW INCOME DESIGNATIONS

My feedback is relative to the EJ and Low Income maps. I have been dismayed to find, in several situations (Pana and Lawrenceville) that part of a community is designated as low income and/or environmental justice, but that the projects to serve their municipal water treatments centers are not eligible because the facility itself is not in the mapped area. I respectfully ask that these parameters be reevaluated. If a community has received the Low Income/Environmental Justice designation, the facilities/service providers serving that community should be eligible projects under the program in my opinion.

I also wonder how the east side of Springfield, our capital city, is not designated as a low income/environmental justice area. There are presently four coal-fired plants operating on the east side of Springfield that have been operational for years. I believe this region should be reevaluated and more opportunities should be afforded. Thank you!

Best Regards,

Michelle

**Michelle Marley-Knox**, Founder  
WindSolarUSA, Inc.  
ph. 217.825.4206  
[michelle@windsolarusa.com](mailto:michelle@windsolarusa.com)  
[www.windsolarusa.com](http://www.windsolarusa.com)

**To:** Illinois Power Agency  
**From:** Jay Corgiat  
& Participants in the Illinois Solar for All Working Group  
**Date:** 02/16/2021  
**Re:** Illinois Solar for All Working Group Comments on PY4 Project Selection for IL Solar for All

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Dear Illinois Power Agency & Program Administration Team:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the PY4 Project Selection for the Illinois Solar for All Program. This memo describes an overview of the Illinois Solar for All Working Group.

Background: Illinois Solar for All Working Group

The Illinois Solar for All Working Group (the Working Group) formed from a subset of members of the Illinois Clean Jobs Coalition, who had comprised an Environmental Justice-Solar-Labor Caucus (the Caucus) during the negotiation of policies that would become the Future Energy Jobs Act (FEJA). The group formed in order to bring the best practices and policies to the Illinois energy landscape that would serve to maximize benefits to the economically disadvantaged households and communities that targeted programs are intended to serve. The group was co-facilitated by a representative of a solar company, Amy Heart of Sunrun, and a representative of an environmental justice group, Juliana Pino of the Little Village Environmental Justice Organization.

Following passage of FEJA in December 2016, the Caucus expanded into the Illinois Solar for All Working Group, an open membership group including experts on environmental justice, environmental advocacy, consumer protection, solar business, low-income solar policy, energy efficiency, job training, program design, and other areas, who have substantive research and experience to bring to bear on implementation of Illinois Solar for All. Currently, the Illinois Solar for All Working Group is co-facilitated by Juliana Pino of Little Village Environmental Justice Organization and MeLena Hessel of Environmental Law and Policy Center. Over 75 participants include representatives from the following organizations and others:

Architectural Services Group, Inc.	ONE Northside
Central Road Energy LLC	Prairie Rivers Network
Environmental Law & Policy Center	SustainRockford
Green Energy in Motion, Inc.	Trajectory Energy Partners
Little Village Environmental Justice Organization	Vote Solar

Working Group Process

The Working Group began convening in January 2017, and has had monthly full-group meetings until the present time. From time to time, the Working Group operates with sub-teams or break out groups that focus on specific areas relevant to the policies at hand and future work on the program. These sub-teams have included: Program Administration & Evaluation, Consumer Protection & Financing, Education & Engagement, Job Training, and Project Workshop.

### Working Group Commenting and Engagement History for IL Solar for All

- A draft White Paper was delivered to the IPA on May 5, 2017.
- Many Working Group participants attended IPA's May 2017 workshops and helped develop responses to IPA's June 6, 2017 Request for Comments on the Long-Term Renewable Resources Procurement Plan.<sup>1</sup>
- A final White Paper was published on July 11, 2017 on [lowincomesolar.org](http://lowincomesolar.org).<sup>2</sup>
- The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.<sup>3</sup>
- Additionally, the group has engaged in stakeholder sessions and submitted comments on:
  - Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClima on December 10, 2018;
  - Grassroots Education and Approved Vendor components on January 9, 2019;
  - Environmental Justice provisions on January 30, 2019;
  - Job Training provisions and Third-Party Evaluation provisions on February 7, 2019;
  - Project and Participant Eligibility and Verification Processes on March 13, 2019;
  - the Low-Income Community Solar REC contract on April 2, 2019;
  - Project Selection on April 15, 2019; and
  - Consumer Protection on April 19, 2019.
- Many Working Group participants also attended IPA's June 2019 workshops and helped develop the Working Group's response to IPA's July 3, 2019 Request for Comments on the Long-Term Plan Update.
- The Working Group continues to provide input to comment and stakeholder processes initiated this year to implement the Revised Long-Term Plan, including via May 2020 comments on project selection and July 2020 comments on Approved Vendor reporting.

### Program Principles for Illinois Solar for All

During the negotiation of FEJA, the Caucus membership collectively agreed upon the following policy principles to guide our work moving forward. These principles were rooted in the *Low-Income Solar Policy Guide*<sup>4</sup> authored by GRID Alternatives, Vote Solar, and the Center for Social Inclusion; further adapted through iterative deliberations in the Caucus; and ultimately adopted by the Working Group. The principles include:

- **Affordability and Accessibility.** Offers opportunities for low-income residents to invest in solar through a combination of cost savings and support to overcome financial and access challenges. Creates economic opportunities through a job training pipeline. Supports skill development for family-supporting jobs, including national certification and apprenticeship programs.
- **Community Engagement.** Recognizes community partnerships are key to development and implementation, ensuring community needs and challenges are addressed. Strive to maximize projects located in, and serving, environmental justice (EJ) communities. Allows for flexibility for non-profit/volunteer models to participate, and strives to meet potential trainees where they are, with

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<sup>1</sup> <https://www.illinois.gov/sites/ipa/Documents/ILSfA-Working-Group-Response-RequestforComments.pdf>

<sup>2</sup>

[http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper\\_Final\\_wAppendices.pdf](http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper_Final_wAppendices.pdf)

<sup>3</sup>

<https://www2.illinois.gov/sites/ipa/Documents/2018ProcurementPlan/2018-LTRenewable-Illinois-Solar-for-All-Working-Group-Comments.pdf>

<sup>4</sup> [www.lowincomesolar.org](http://www.lowincomesolar.org)

community-led trainings.

- **Sustainability and Flexibility.** Encourages long-term market development and will be flexible to best serve the unique low-income market segment over time and as conditions change. Program administrator ensures community engagement, statewide geographic equity, and flexibility to meet goals. Job training program includes all training partners in design and implementation. Training offerings should come through diverse channels including utilities, unions, tech schools, non-profits, government agencies, and existing community-based job training organizations.

- **Compatibility and Integration.** Low-income program adds to, and integrates with, existing renewable energy and energy efficiency programs, and supports piloting of financing tools such as PAYS (pay-as-you-save), on-bill financing, PACE or community-led group buy programs. Jobs training programs will strive to ensure low-income solar installations incorporate workforce development, including coordinating opportunities for job training partners and individual trainees from the same communities that the low-income solar program aims to serve.

The Working Group researched and prepared the enclosed comments to deliver high quality information and recommendations on considerations for the Illinois Solar for All Program and the Long-Term Renewable Resources Procurement Plan. The contents are not intended to reflect universal consensus on any point amongst working group members. These contents reflect extensive deliberation regarding aspects that the Working Group believes are important to the Program's success moving forward.

In closing, we make these recommendations and comments to ensure high-quality implementation for Illinois communities. Communities throughout Illinois need the opportunities and services the Illinois Solar for All Program will provide and the support of groups with substantive experience in the solar industry and low-income solar in particular. Please do not hesitate to contact us with questions or comments in regards to this matter.

## Illinois Solar for All Working Group Comments on Proposed Project Selection Protocol (2021)

### Introduction

The Illinois Solar for All (ILSfA) Working Group (“Working Group”) appreciates this opportunity to comment on the revised Project Selection Protocols put forward by the Illinois Power Agency (IPA) and Elevate Energy in its role as Program Administrator. We also appreciate the considerable thought and effort the program administration team has already put into developing and refining this protocol over the three previous program years.

That said, **we are deeply disappointed at the late start date for this important effort.** We are now less than four months from the start of PY4. Yet, as our working group members that develop ILSfA projects have told us, the development process for community solar (CS) is at least a one year process with non-profit/public facility (NP/PF) and low income distributed generations (LI DG) typically taking at least six months from project inception to a completed Part 1 Application. For project selection criteria to best incent desired outcomes, clearly defined selection criteria should be made available to Approved Vendors and developers before this development process starts. We find ourselves caught in the same predicament as the last program year - change that would better advance a diverse range of projects cannot be implemented in time to change developer behavior and could thus disrupt the reasonable expectations of developers and the communities they work with that the program is meant to serve.

The scoring in the current proposal is identical to the current Project Selection Protocol, with the majority of the changes related to definitions and clarification of procedures. Consequently, many of the concerns that we expressed in our previous comments on the proposed selection protocol for PY3 that we asked to be pushed off to PY4 remain. Because of the short turnaround between the finalization of these protocols and the PY4 program year opening, many of these suggestions are now targeted to PY5. While we understand the concerns regarding 2022 LTRRPP revisions and potential unforeseeable impacts on the PY5 project selection protocols, **it is absolutely critical that the Solar for All Program Administration team figure out how to make important, meaningful changes to project scoring in PY5 with enough lead time to matter.**

Consequently, we suggest that the IPA and the Program Administrator publish appropriately caveated guidance for PY5 scoring with our suggested changes and any other relevant anticipated changes. This guidance should include the caveat that LTRRPP revisions may result in further changes. We intend to request that the LTRRPP be amended such that selection protocols be finalized at least 12 months prior to the program year start, that any changes to the protocols resulting from changes to the LTRRPP not take effect for at least 12 months (i.e., until PY6), and that the PY5 project selection protocol guidance be accepted as the final protocols for PY5. We request that both the PY4 Selection Protocols and the PY5 Selection Protocols Guidance be issued concurrently.

A key thrust of the Future Energy Jobs Act's creation of both the Long-Term Renewable Resources Procurement Plan and the Illinois Solar for All Program was creating the long-term market signals necessary for a market to thrive. The status quo in which changes to project selection occur and have an impact only within a very short time window surely frustrates the intent of that Act.

## **Response to Questions for Stakeholder Comment**

***Q: Given this data, do you feel the location criteria of the community solar program is working well to provide the benefits of solar to EJs and LI communities? If not, what communities are not being served?***

We do not feel the location criteria of the CS program - or the NP/PF program, for that matter - are working as well as they should to provide the benefits of solar to Environmental Justice (EJ) and Low Income (LI) communities.

Based on the data provided, namely that 83% and 99% of the value of the 11 CS Renewable Energy Credit (REC) contracts awarded have gone to projects in EJ and LI communities, respectively, we believe the current selection protocols have been successful in focusing development in LI and EJ communities. However, when we look at where projects are being located relative to the populations living in EJ communities (EJCs), we start to see some concerning results. For example, 80.8% of the households that live in EJCs in Illinois are located in Cook County but only 3.5% of the total value of the CS REC contracts have been awarded to projects located there. Meanwhile, Champaign County with less than 1% of households living in EJCs in Illinois has received 31% of the total value of the CS REC contracts. Consequently, we feel that the EJCs in Cook County are underserved and would like to see the location criteria altered to target projects in Cook County and in other/future underserved areas. .

The Solar for All Working Group does appreciate the provision of this data, in the first place. It has furthered our understanding of project diversity across the state and we hope to see it or similar data provided in the future.

- ***What type of location criteria would better direct funds to the areas you define as underserved?***

We are advocating for location criteria changes for PY4 in the CS and NP/PF subprograms. For PY4, we want to see the Group A vs Group B utility scoring eliminated and replaced by a more targeted approach that rewards project development in underrepresented areas of the state. Given our expectation that developers would have limited to no capacity to respond to this scoring change for PY4, we would keep the point awards quite low. However, for PY5 protocol guidance, we want the potential

points increased to effectively incentivize project development in underserved areas going forward.

The Program Administrator has divided the state into five sectors for the purpose of showing what areas Approved Vendors are willing to work in. As we suggested in comments on the PY3 selection protocols, this division of the state provides an appropriate level of granularity for enhancing geographic diversity within the subprograms.

For example, the LI EJC populations of these five sectors could be estimated and used to calculate an ILSfA subprogram funding per capita metric (over all time). The sectors that are significantly underserved for the CS and NP/PF subprograms could then be prioritized with (an) extra point(s). We advocate using *% Households in EJC* divided by the *% of total REC contract funds* allocated to that sector as a proxy for the LI EJC population. The *% Households in EJC* would be calculated by dividing the number of households living in EJC in the sector by the total number of households living in EJC in the state. The *% of total REC contract funds* would be calculated by dividing the subprograms dollar amount of REC contracts awarded to that sector to date divided by the total subprograms contracts awarded to date.

For PY4 we recommend the following scoring:

*% Households in EJC / % of total REC contract funds*  $\geq 10$  receives 0.5 Points  
*% Households in EJC / % of total REC contract funds*  $\geq 5$  and  $< 10$  receives 0.25 points  
*% Households in EJC / % of total REC contract funds*  $< 5$  receives 0 points

In this scenario, Cook County, defined as a program sector, would score a metric of 23 in the CS subprogram and CS projects located there in PY4 would receive 0.5 points.

The sectors would then be ranked by *% Households in EJC* from largest to smallest. Subprogram projects located in a sector that has not yet been awarded a REC contract in that subprogram would get the same points as the same subprogram project would get in the sector ranked above them.

With the longer lead time going into PY5, we advocate that these scores be increased in PY5 protocol guidance to better direct development. we suggest the following

*% Households in EJC / % of total REC contract funds*  $\geq 10$  receives 2 Points  
*% Households in EJC / % of total REC contract funds*  $\geq 5$  and  $< 10$  receives 1 point  
*% Households in EJC / % of total REC contract funds*  $< 5$  receives 0 points

This metric would be recalculated after the REC contracts are awarded during a program year and made available to grassroots educators, Approved Vendors, and developers with sufficient lead time ahead of the next program year open. This would allow

Approved Vendors and stakeholders the opportunity to focus their efforts in the areas that have the best chance of being selected for projects while better targeting incentives to underserved areas.

- ***For example, would tiering within existing designated EJC's be a method of interest, in order to provide additional point spread in the EJC selection round? An example of tiering could be giving more weight in the first round of project selection to projects located in EJC's in the counties with the highest percentage of households in EJC's (reflecting EJC density).***

We do not advocate adding more tiers. Based on our evaluation of the results, the current tiered system does not appear to significantly change the results from what a non-tiered system would provide. Additional tiers would only further complicate the ability to, understand, predict, and communicate how projects are prioritized and selected.

***Q: Funding for PY4 is available beginning June 1, 2021. The project submission window timelines haven't yet been determined, but, for reference, the windows opened July 6, 2020 for Non-Profit/Public Facilities and Low-Income Distributed Generation projects and on August 24, 2020 for Low-Income Community Solar projects in PY3, and dates for PY4 could be similar. Given project development timelines, how far in advance of the PY4 project submission window opening is a finalized Project Selection Protocol needed? Please note that waiting to implement more substantive changes for PY5 (starting June 1, 2022), so as to allow more advance notice for Approved Vendors, may not be a viable option because the Long-Term Renewable Resources Procurement Plan will be updated prior to the start of PY5 and may include additional changes impacting ILSFA's project selection process.***

The Working Group requests that the application window open as soon as practicable after the June 1st, 2021 PY4 open for all of the subprograms subject to the project submission window process. The suggested protocols are substantially similar to the previous version and the changes for which we are advocating do not materially change that fact. Consequently, we believe that developers will have had adequate guidance for successful project development and that an additional one or two months would not alter the type of projects that developers will be submitting. We are concerned that any delay in the window opening longer than two to three months would result in negative consequences to the Qualified Trainees that have been hired to work on ILSfA projects. The solar industry is already suffering from the effects of the current "solar cliff" funding issues and substantial delays of the one program with funding would exacerbate, not help, those issues.

While it is difficult to know exactly when the smart inverter DG capacity rebate amount will be changed, it is likely to happen in early 2022. The CS projects that are currently under development have assumed that their projects will receive the current smart inverter rebate. Opening the ILSFA project application window as early as allowed gives these projects a strong

chance of receiving the current rebate amount, while any delay could make the projects financially unfeasible and put the program and the communities the projects are meant to serve at risk of losing those projects.

## **Additional Issues**

### ***System Size Scoring***

The proposed project selection protocol takes a different approach to scoring system size for nonprofit and public facility projects vs. community solar projects. We will comment on each separately.

#### *Nonprofit and Public Facility*

As we noted in our 2020 selection protocol comments for PY3, we continue to recommend awarding higher points to smaller projects. While the Working Group does not have complete consensus on such a proposal, a majority of active participants have a preference for smaller projects over larger projects with the overarching goal of getting more projects out to more communities throughout the state. At the same time, we recognize the potential demerits of such a proposal, including effectively decreasing the total amount of solar capacity (i.e., kW) that is built by the funding available to the program and entirely boxing out larger projects and customers from the program. Nonetheless, and particularly given the small size of the NP/PF subprogram annual budget relative to the incentive value of a single large NP/PF project, we feel the benefits of incentivizing small projects in this subprogram outweigh the costs.

The projects awarded REC contracts to date indicate that the NP/PF projects are somewhat constrained by the size of the property/roof and the energy usage of the NP/PF. Segregation of the results of PY1, PY2, and PY3 into relatively equivalent amounts of funding results in the following “bins”:

Size	Number of Projects	Total REC \$ Awarded
0 – 100 kW	30	\$3.2MM
>100 – 275 kW	4	\$2.6MM
>275 – 500 kW	4	\$2.2MM
>500 – 1,000 kW	2	\$2.3MM
> 1,000 kW	1	\$1.5MM

Based on this analysis, we suggest the following subdivisions and point scores, which favor smaller projects:

0 – 100 kW	1 Point
>100 – 275 kW	0.75 Points
>275 – 500 kW	0.5 Points
>500 – 1,000 kW	0.25 Points
> 1,000 kW	0 points

We recommend implementing these changes in the PY5 scoring protocols guidance.

For PY4, we ask that the current demarcation between small and large projects increase from the current 100 kW to 200 kW. We ask this mainly to support slightly larger projects than just those less than 100 kW that would target some larger NP/PF like schools. The current lower limit lumps these medium sized projects into a class that includes very large projects. We hope that this will spur some larger projects to limit the array size while still proving to be worthwhile to the participant.

### *Community Solar*

As with the NP/PF subprogram, the majority of the Working Group supports the advancement of more and smaller CS projects spread across the state. We believe the benefits communities derive from CS projects located within and meaningfully connected to the community are significant. These benefits include local jobs during construction and operation, project visibility, and enhanced community engagement. And we agree with the Agency and the Solar for All program administration team that projects located within communities and with deep community roots are often smaller projects.

However, we do want to caution that small project size is not an effective substitute for directly scoring a community-connected project. Small projects can be an indicator of community connectivity when all else is equal, but as soon as it is not equal, i.e. as soon as small projects are advantaged, such projects will be much more likely to be developed regardless of their community connectivity and thus project smallness will no longer be a fair proxy for community connection. The Working Group urges the program administration team to keep this in mind when making final decisions regarding project selection and consider what other criteria (e.g. non-greenfield status) might be paired with project smallness to maintain size as an indicator of community connectivity. We also advocate that any changes to CS size scoring be included in the PY5 Protocol Guidance.

### ***Anchor Tenant and Project Host Definitions***

We support the definitions more carefully defined in this version of the Project Selection Protocols.

**Funding Sources and Allocations**

The proposed language in this section is consistent with the Program Administrator’s and Illinois Power Agency’s September 11, 2020 Clarification Regarding Allocation of RERF and Utility Funds memorandum and the language of the LTRRPP. Specifically, the LTRRPP states that, “[f]or each of the three non-competitively procured sub-programs, approved project applications within a program year will be first funded by the utility funds, and then by the RERF funds.” While we understand the need for clarification in the project selection protocols, we do not agree that this is the best method for allocating funding. In our LTRRPP 2021 revision comments, we will suggest that the allocation take place in such a way as to maximize the use of the utility funds. We suggest that this section of the Selection Protocols be left out of the PY5 Protocols Guidance so that a change to the LTRRPP would not result in a change to the PY5 Protocols Guidance.

**Waitlist**

We do not feel that individual waitlists for EJC, LI and general tiers are necessary. Because of the way the scoring protocols are arranged, the highest scoring and thus the project that best fulfills the goals of the program will be at the top of the unfunded projects. We feel the system described in the draft is unnecessarily overcomplicated and should be removed.

**Nonprofit/Public Facility Participant Savings**

We suggest some minor changes to the NP/PF participant savings that should be included in the PY4 protocols and the PY5 protocol guidance.. We feel these minor adjustments would incentivize many developers to stretch for additional points by passing on additional savings to their NP/PF participants.

Min Savings	50%	65%	50%	65%
	Current Criteria		Suggested Criteria	
0.25 points	>50% to <=60%	>65% to <=75%	>50% to <=65%	>65% to <=80%
1 point	>60% to <=80%	>75% to <=95%	>65% to <=75%	>80% to <=90%
2 points	>80%	>95%	>75%	>90%



January 28<sup>th</sup>, 2021

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

**Re: Illinois Solar for All Project Selection Protocol Request for Stakeholder Comments**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the proposed Project Selection Protocol for Program Year 2021-2022 (PY4). We support the updated draft as proposed on January 19<sup>th</sup>, 2021 and agree with the assessment based on the locational analysis that “the ILSFA program is meeting its goals of awarding funding to projects in EJs or EJ-adjacent areas above and beyond the required 25%”.

Trajectory’s request on the timing of the PY4 submission window is that the application window should open on the first allowed date, June 1<sup>st</sup>, 2021. The primary reason for this suggestion is that any delay in the program for 2021 would put the selected projects at risk of being ineligible for the smart inverter DG capacity rebate administered by both ComEd and Ameren. While it is difficult to know exactly when the current rebate amount in place will be changed, it is likely to happen in early 2022. Opening the ILSFA project application window as early as allowed gives these projects a strong chance of receiving the current rebate amount, while any delay could put both the rebate and the overall economics of these projects at risk. In addition, the proposed PY4 project selection protocol is nearly identical to the PY3 selection protocol, meaning that approved vendors will have had well over a year to develop projects under the existing criteria.

Additional responses to specific questions:

- 1. Given this data, do you feel the location criteria of the community solar program is working well to provide the benefits of solar to EJs and LI communities? If not, what communities are not being served?***

Trajectory believes that the current project selection criteria is working and has resulted in a diverse geographic distribution of community solar projects in EJs and LI communities. Based on the projects entered into the program thus far, we believe that the program will continue to benefit additional EJs and LI communities in PY4 and beyond, and that the location criteria will result in continued diverse project selection.

- 2. For example, would tiering within existing designated EJs be a method of interest, in order to provide additional point spread in the EJ selection round? An example of tiering could be giving more weight in the first round of project selection to projects located in EJs in the counties with the highest percentage of households in EJs (reflecting EJ density).***



Trajectory believes that changes of this magnitude that add additional locational criteria should be part of the stakeholder process for the Long-Term Renewable Resources Procurement Plan revisions that will be conducted by the IPA in 2021.

- 3. Funding for PY4 is available beginning June 1, 2021. The project submission window timelines haven't yet been determined, but, for reference, the windows opened July 6, 2020 for Non-Profit/Public Facilities and Low-Income Distributed Generation projects and on August 24, 2020 for Low-Income Community Solar projects in PY3, and dates for PY4 could be similar. Given project development timelines, how far in advance of the PY4 project submission window opening is a finalized Project Selection Protocol needed? Please note that waiting to implement more substantive changes for PY5 (starting June 1, 2022), so as to allow more advance notice for Approved Vendors, may not be a viable option because the Long-Term Renewable Resources Procurement Plan will be updated prior to the start of PY5 and may include additional changes impacting ILSFA's project selection process.***

As stated above, Trajectory requests that the PY4 project submission window open at the first allowable date, June 1, 2021. Given that the proposed criteria have no substantial changes over the PY3 project selection criteria, Approved Vendors will have had over a year to develop projects under the current criteria. Critically, opening the window as early as is allowed will give these projects a reasonable chance of being eligible for the current smart inverter DG capacity rebate.

As noted, Program Year 5 for ILSFA will take into consideration any updates to the Long-Term Renewable Resources Procurement Plan. As part of that process, the IPA and stakeholders will have to consider the implications of any substantial changes to the locational criteria for projects. Based on Trajectory's experience over the last four years, community solar projects that must meet highly specific selection criteria attributes often take over 12 months to develop, particularly when working with non-profits and government-sector entities in EJC and LI communities. In addition, community solar projects require significant lead time to complete the community engagement that is both an industry best practice and an ILSFA requirement.

Respectfully submitted,

A handwritten signature in black ink that reads 'Jon Carson'.

Jon Carson  
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