



**December 10, 2018**

Trajectory Energy Partners, LLC  
P.O. Box 310  
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**Re: Trajectory Energy Partners Comments to Adjustable Block Program Guidebook Draft dated 11/28/18.**

Trajectory Energy Partners (“Trajectory”) appreciates the opportunity to comment on the Adjustable Block Program Guidebook Draft dated 11/28/18 (the “Draft Guidebook”), and the work of the Illinois Power Agency (“IPA”) and InClime to develop the Draft Guidebook. Trajectory is generally supportive of the approach laid out in the Draft Guidebook, and would like to offer the following solution to one issue.

Page 25 of the Draft Guidebook states:

“Note that variations of less than 5% (or less than 1 kW, if 1 kW exceeds 5%) in size or capacity and variations in plot placement that impact less than 5% of the total surface area covered by the solar array(s) will not require project reapproval.”

Trajectory appreciates the IPA’s interest in ensuring that the project proposed is the project built, and in particular in ensuring that as between co-located Community Solar projects, the project selected is the actual project built. However, developers will typically and reasonably not pursue significant local geotechnical and drainage diligence until a REC or offtake contract is secured, as these studies are expensive, invasive, and potentially disruptive for landowners. A change of more than 5% of the total surface area covered by the solar array may be necessary in order to accommodate necessary drainage improvements, avoidance of problematic soil formations, or otherwise improve the design to balance landowner, developer, environmental, and regulatory interests. In order to achieve the IPA’s goals but provide reasonable flexibility consistent with solar development best practices and regulatory requirements, Trajectory would recommend that the metric be calculated based on the area enclosed by the project fence line, and be slightly more flexible than the 5% limit proposed in the Draft Guidelines. A fence is required for ground-mounted solar projects pursuant to the National Electric Code and therefore will be a consistent feature on all submitted site plans. It is also a more simply calculated area than “total surface area covered by the solar arrays” which will depend on the ultimate panels and other equipment selected.

To that end, Trajectory would recommend the following edits to that language on Pg. 25, with conforming changes elsewhere in the Draft Guidebook and Opening Lottery Procedure.



~~“Note that variations of less than 5% (or less than 1 kW, if 1 kW exceeds 5%) in size or capacity and variations in project area enclosed by a fence in plot placement that impact less than 520% of the total surface project area enclosed by a fence covered by the solar array(s) will not require project reapproval.”~~

Thank you for your consideration.

Respectfully submitted,

/s/ Josh Bushinsky

Josh Bushinsky

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