info@thirdpillarsolar.com

Third Pillar Solar
4201 Main Street Suite 200-206
Houston TX, 77002

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Illinois Power Agency
105 W Madison St
Chicago, IL 60602
IPA.Solar@Illinois.gov

[*via electronic mail*]

RE: Draft 2025-26 Program Guidebook Feedback

Dear Program Administrator,

Third Pillar Solar is pleased to provide the following comments to the "Program Guidebook, Draft Version Released March 7, 2025, for Stakeholder Feedback" published by the Illinois Power Agency (the "Draft Program Guidebook"). Third Pillar Solar is a Floating Solar Photovoltaic ("FPV") project developer and operator pursuing community solar and other distributed generation projects in Illinois and other markets in the United States. Third Pillar Solar focuses its comments on the treatment of FPV in the Traditional Community Solar point-scoring rubric, which (if clarified) would ensure that FPV projects are placed on equal footing with other projects that do not impact greenfields or prime agricultural land.

Floating Solar Photovoltaic Background and Benefits

FPV projects consist of conventional solar PV panels mounted on robust high density polyethylene plastic and metallic floating docks that are mechanically stabilized on water. More than 500 Projects have been installed worldwide with a cumulative capacity of 2.5GW. In the United States, FPV projects are one of the fastest growing segments of the overall solar market, with over 30MW of projects having been deployed to date.

Third Pillar Solar, like other developers in the field, focus on FPV projects built and operated on man-made industrial, commercial or municipal waterbodies. Such FPV projects are a true "dual-use" application of solar, thus eliminating the need to remove land from agricultural or other productive uses.

Third Pillar Solar estimates that there are upwards of several gigawatts of potential FPV capacity in Illinois alone on man-made bodies of water.

Development of FPV in Illinois is consistent with the aims of Illinois Shines and its enabling statute to reduce impact to land.

As the program has evolved from an initial lottery to a modified first come/first served approach, the Illinois Shines Traditional Community Solar Block has been designed to incentivize development of solar projects away from undisturbed greenfield properties. In its enabling statute, the General Assembly directed the IPA to design Illinois Shines to "ensure that renewable energy credits are procured from projects in diverse locations and are not concentrated in a few regional areas."[1] FPV projects on commercial and industrial properties or municipally owned waterbodies represent one of the most achievable pathways to meeting this objective. By utilizing man-made industrial, commercial, or municipal waterbodies that do not currently have public access or recreational uses, FPV projects represent a completely new category of locations for community solar projects, increasing the diversity of locations sought after in the Illinois Power Agency Act. Moreover, FPV projects can be sited closer to urban areas and population centers as they can be sited on man-made waterbodies with no public access uses in populated areas where land costs a premium and rooftop space may not otherwise be available or large enough to support a community solar project. By specifically targeting man-made industrial or commercial waterbody structures, Third Pillar Solar actively screens out and avoids sites that host public recreation, present viewshed concerns for surrounding residents, and/or have significant value as habitat to flora or fauna.

As defined by the Department of Energy, FPV projects serve as a prime example of Dual Use Photovoltaic Technologies.[2] FPV projects provide significant additional benefits to waterbody owners that are not otherwise compensated to the FPV project. These include savings due to significantly lower evaporation in the waterbody[3] and reduced algal blooms.[4] As such, much like rooftop projects provide certain additional value to the landowner and receive additional points for siting, FPV projects should be treated similarly and at least have the certainty of receiving two points in the siting category for Traditional Community Solar Projects. As a reference, several other states, such as New York, New Jersey, and Massachusetts, have implemented FPV-specific incentives and preferred siting criteria to ensure that FPV projects are incented for deployment.

In addition, FPV projects are consistent with the Illinois Power Agency's objective of avoiding siting solar projects on greenfield sites and incentivizing siting projects at locations that are otherwise developed. In August 2023, in seeking comment on the 2024 Long-Term Procurement Plan, Illinois Power Agency actively sought feedback on incentives and criteria to encourage siting community solar projects on "non-greenfield" sites and otherwise "away from undeveloped greenfield sites."[5] By utilizing man-made industrial, commercial or municipal waterbodies, FPV projects are precisely the type of project the Illinois Power Agency sought to incentivize in the 2024 Long-Term Procurement Plan.

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[1] 20 ILCS 3855/1-75(c)(1)(K)

[2] Source: https://www.energy.gov/eere/solar/dual-use-photovoltaic-technologies

[3] https://onlinelibrary.wiley.com/doi/10.1002/er.5170

[4] https://www.researchgate.net/publication/371005986_Floating_Photovoltaics_FPVs_Impacts_on_Algal_Growth_in_Reservoir_Systems

[5] Draft Long-Term Renewable Resources Procurement Plan for Commission Approval dated October 20, 2023, pp 159-60.

However, even though FPV projects on commercial, industrial, and municipally owned artificial bodies of water with no public access or recreational uses meet the geographic diversity objectives and are on land that is currently in use, the Traditional Community Solar scoring guidelines are not clear that such FPV projects in fact qualify for points pursuant to Section 1(a), Section 1(b), Section 1(c), or Section 1(d) of Appendix E to the Draft Program Guidebook. The Draft Program Guidebook describes points-scoring opportunities for projects sited on "existing structures", "brownfields", or "dual-use." FPV projects achieve the same end as such listed projects in avoiding the need to be sited on greenfield land. As such, recognizing the value of FPV projects toward meeting the objectives of the statute, Long Term Procurement Plan and Draft Program Guidebook favors clarifying that FPV sited on commercial, industrial, or municipally owned man-made bodies of water with no public access uses should be eligible for points pursuant to Section 1(a), Section 1(b), Section 1(c), or Section 1(d) of Appendix E to the Draft Program Guidebook.

Third Pillar Solar requests clarification that certain man-made waterbodies are eligible for points under the IL Shines Scoring Criteria for Traditional Community Solar Projects so that FPV projects are considered on equal footing with other types of solar projects.

For FPV projects to participate in the Illinois Shines program on equal footing with rooftop and ground mount community solar projects that equally meet the goals of CEJA, and to enable FPV projects to contribute to the aims of the Illinois Shines program, Third Pillar Solar requests the following clarifications to be made to Appendix E to the Draft Program Guidebook:

Third Pillar Solar requests the following clarification to be made to Section 1(a) of Appendix E to the Draft Program Guidebook:

> Sited "contaminated lands" as defined by the United States Environmental Protection Agency **(including abandoned and inactive mine lands that have filled with water), or man-made industrial, commercial or municipal waterbodies with no public access use.** (Add 2 points)

Third Pillar Solar requests the following clarification to be made to Section 1(b) of Appendix E to the Draft Program Guidebook:

> Sited on rooftops or other existing structures, **including commercial, industrial, or municipally owned man-made bodies of water with no public access.** (Add 3 points)

Third Pillar Solar requests the following clarification to be made to Section 1(c) of Appendix E to the Draft Program Guidebook:

> Sited on a brownfield, as defined in Section1-10 of the Act and further clarified in Section 5.4.2 of the Plan, **or man-made industrial, commercial or municipal waterbodies with no public access use**. (Add 2 points)

Third Pillar Solar requests the following clarification to be made to Section 1(d) of Appendix E to the Draft Program Guidebook:

> Commitment to utilize agrivoltaics or dual-use solar. **Dual-use solar will include projects on sites with existing commercial, industrial, or municipal use that will not be impeded by the operation of the project**.

Third Pillar Solar requests the following clarification to be made to footnote 103 of Appendix E to the Draft Program Guidebook:

> Dual-use refers to the co-location of photovoltaic electricity generation and a non-energy use on the same land**, or man-made industrial, commercial or municipal waterbody with no public access use,** at the same time.

These clarifications provide FPV projects with the certainty to achieve parity with both rooftop and other solar projects that meet the objectives of the program that incentivize projects that are not located on greenfield sites. Third Pillar Solar is actively working with landowners in Illinois to develop FPV projects across the state and scoring clarity would allow Third Pillar, as well as the landowners, security to move forward.

Third Pillar Solar appreciates the IL Shines Program Administrator's support of our point scoring submission for our first floating solar application, Oasis Solar 1 LLC – Applicant ID 147641. The outcome of the scoring review confirms our view on Exhibit E Section 1(b) and Section 1(d) of Third Pillar Solar's submission. Our requested changes would serve to remove any remaining ambiguity around these criteria.

Clarifying the language in the Draft Program Guidebook will support the responsible development of FPV in Illinois. Better defining the ability of a FPV project to reach the five-point threshold to be put on a waitlist for a REC contract, or to better compete with the many projects submitted with more than five points, is likely to support development of FPV projects which further the goals of the Illinois Shines Program. These changes to the Draft Program Guidebook will provide enough certainty for developers that a REC contract will be awarded.

Finally, FPV projects, much like rooftop solar, projects face cost and energy yield related challenges compared to traditional ground mounted solar projects. In order to receive the same treatment as rooftop solar projects, FPV projects should have the certainty of receiving points in the siting criteria for community solar projects under the Illinois Shines program.

Thank you very much for the opportunity to provide these comments on the Draft Program Guidebook. For any questions or concerns regarding the above, please contact me at Astrauss@thirdpillarsolar.com.

Sincerely,

Andrew Strauss
Manager of Policy and Regulatory Affairs