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Illinois Power Agency
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[via electronic mail]

RE: 2026 Long-Term Renewable Resources Procurement Plan

Dear Staff,

Third Pillar Solar is pleased to provide the following comments to the proposed 2026 Long-Term Renewable Resources Procurement Plan (“the Plan”) that was published by the Illinois Power Agency (“IPA”) for comment on August 15, 2025.¹ Third Pillar Solar is a Floating Solar Photovoltaic (“FPV”) focused developer and operator. Third Pillar Solar is an active participant in the Illinois distributed generation and community solar market with approximately 35MWdc on the Illinois Shines waitlist, and more planned for the future. Third Pillar focuses our comments today on the treatment of FPV in the Illinois Shines program which, if clarified, would allow FPV projects to be on equal footing with other projects that do not impact greenfields or prime agricultural land.

Third Pillar would also like to acknowledge Staff’s commitment to supporting and encouraging the solar industry considering HR 1, The One Big Beautiful Bill Act. Whereas some states have relented to the anti-renewable messaging coming from Washington, the IPA continues to be a strong partner to the renewables community.

Floating Solar Photovoltaic Background and Benefits

As described in Third Pillar Solar’s previous filings in response to the 2024-2025 Program Guidebook and 2025-2026 Program Guidebook, 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. A cumulative capacity of over 10GW has been installed globally to date. In the United States, FPV projects are one of the fastest growing segments of the overall solar market, with over 40MW of projects having been deployed to date and hundreds of MWs in development.

¹ 2026 Long-Term Renewable Resources Procurement Plan Draft for Public Comment published August 15, 2025.

Third Pillar focuses on FPV projects that are 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 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 it has evolved from an initial lottery to a modified first come/first serve approach, the Illinois Shines program 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.”² 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.

Third Pillar applauds the IPA for acknowledging that FPV projects fit into the Illinois Shines dual use regime

Third Pillar thanks the IPA for its footnote in the Plan agreeing that FPV projects can be considered to qualify for the dual use points on a case-by-case basis.³ Third Pillar also supports Staff’s decision to increase the scoring available to dual use projects from 1 point to 2 points.⁴ By accepting these proposed changes, Illinois can join several other states, such as New York, New Jersey, and Massachusetts, who have already implemented FPV-specific incentives and preferred siting criteria to ensure that FPV projects are incented for deployment.

² 20 ILCS 3855/1-75(c)(1)(K)

³ 2026 Long-Term Renewable Resources Procurement Plan Draft p. 190.

⁴ *Id.*

The IPA should clarify that FPV projects sited on man-made commercial or industrial waterbodies qualify as “existing structures” for the purposes of Illinois Shines scoring criteria.

Much like the IPA’s acknowledgement that FPV projects can be considered to qualify as dual use for the purposes of Illinois Shines scoring criteria, FPV projects located on man-made commercial or industrial waterbodies should be considered for points as “existing structure.” Third Pillar looks to develop projects on man-made bodies of water such as excavated sand and gravel quarries, man-made industrial reservoirs, wastewater treatment plants, and detention or retention ponds. All these sites deploy FPV on an existing structure that is either 1) no longer being used for its original purpose or 2) complimentary to its original purpose. Furthermore, all these types of sites exist on waterbodies that are not naturally occurring; therefore, the man-made waterbody itself should be considered an existing structure, analogous to the treatment for projects that are mounted on rooftops. By granting “existing structures” points to FPV projects that make use of man-made industrial or commercial water bodies, many of which are otherwise idle, the IPA would further Illinois’s clean energy goals while also protecting greenfield land from being developed. In the Plan, the IPA proposes a subtractor for projects that “do not commit to either agrivoltaics, dual-use solar, or pollinator friendly habitat, and that are not also on contaminated land. The Agency believes that this modification will help ensure projects are considering the built environment in their siting decisions.”⁵ This proposal makes it clear that the IPA wants developers to consider the land they are proposing to develop and penalizing developers who seek to develop on greenfields. By clarifying the eligibility of man-made commercial or industrial waterbodies as “existing structures” the IPA can further this goal. Third Pillar Solar requests that the IPA clarify the eligibility of FPV projects sited on man-made commercial or industrial water bodies as “existing structures” in a similar manner to the clarification that IPA provided for “dual-use” eligibility. Third Pillar Solar requests the following clarification be added to the Plan in Section 7.4.3.1:

Existing structure may include man-made industrial or commercial waterbodies such as, but not limited to, industrial reservoirs, wastewater treatment lagoons, mined lands that have filled with water, or detention and retention ponds.

Third Pillar encourages the IPA to clarify that certain FPV projects are eligible for “brownfield” points in the Illinois Shines program.

Like the discussion above regarding the existing structure definition, Third Pillar believes that certain FPV projects are well suited to be considered as eligible for points under the brownfield definition. The Plan asks for stakeholder feedback to provide insight on factors that could

⁵ *Id.* at 190.

improve development on brownfield sites in Illinois.⁶ Third Pillar would suggest that the IPA clarify the eligibility for brownfield points under the Illinois Shines program to include waterbodies that had been used for excavation, mining activities, or any other industrial, commercial or municipal activity be eligible for the brownfield points.

Third Pillar encourages the IPA to adopt a \$5/REC adder for FPV traditional community solar projects in Illinois as it has for other categories of projects in the past.

In the 2024 Long-Term Procurement Plan, the IPA explained that the vast majority of approved projects for the traditional community solar category were greenfield, ground-mounted projects.⁷ The IPA went on to explain that it was interested in continuing to diversify the types of locations where community solar projects could be built and decided that offering a \$5/REC price adder to rooftop community solar projects would incentivize more of these projects to be pursued and built.⁸ During the comment period for the 2024 Long-Term Procurement Plan, solar developers explained the unique challenges that rooftop systems present and why an adder was needed. These included: higher construction costs, shorter system lives, and lower energy yields.⁹ The benefits of rooftop systems were also discussed and focused on their positive impact on the local distribution grid and their ability to be built in urban environments and communities designated as an Equity Investment Eligible Community.¹⁰

The same rationale that led the IPA to conclude that a REC adder for rooftop projects was appropriate similarly applies to FPV projects because FPV projects share many of the same qualities of rooftop projects. First, and perhaps most importantly, like rooftop projects, FPV projects further diversify the types of locations community solar projects are built, preserving greenfield areas. Second, like rooftop projects, due to their unique siting and construction requirements, as well as the still nascent industry in the United States, FPV projects are also typically more expensive to build.¹¹ Third, like rooftop projects, FPV projects can also be built in urban areas, closer to load, as they do not require large swaths of otherwise undisturbed land to be available for construction. Granting a \$5/REC adder for FPV community solar projects in Illinois would result in more FPV projects, achieving the same policy outcomes that the IPA was seeking when it decided to grant rooftop projects an adder.

⁶ *Id.* at 137.

⁷ 2024 Long-Term Renewable Resources Plan p. 195.

⁸ *Id.*

⁹ Comments on the Draft Long-Term Renewable Energy Resources Procurement Plan on Behalf of the Solar Energy Industries Association, The Coalition for Community Solar Access and The Illinois Solar Energy Association filed Sept. 29, 2023, p 10 https://ipa.illinois.gov/content/dam/soi/en/web/ipa/documents/20231003_joint-solar-parties.pdf

¹⁰ *Id.*

¹¹ Floating Photovoltaic System Cost Benchmark: Q1 2021 Installations on Artificial Water Bodies published by National Renewable Energy Laboratory October 2021 <https://docs.nrel.gov/docs/fy22osti/80695.pdf>

In incentivizing FPV, the IPA would be joining numerous other states, which have taken a variety of actions to incentivize FPV projects. In New York, projects can apply for an adder of \$0.15/W for projects that are “installed on bodies of water such as lakes, reservoirs, and ponds.”¹² In Massachusetts, projects that are “located on a body of water that is currently, or was formerly, used for water treatment, agricultural or industrial activities, and that allows for the continued use of the water body for its intended purpose” can apply for an adder of \$0.03/kWh.¹³ In Maryland, FPV projects that are under 5 MWs and located on “a water retention pond or quarry currently or previously designated for industrial use” are eligible for a certified SREC multiplier of 150%.¹⁴

States around the country are realizing the unique benefits that FPV projects can bring to their communities and have begun to encourage their development. Third Pillar, as noted above, urges the IPA to consider doing the same through clarifying scoring eligibility for “existing structures” and “brownfield” points as well as incorporating a \$5/REC adder for FPV projects.

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

Sincerely,

Andrew Strauss
Manager of Policy and Regulatory Affairs

¹² New York Sun Program Manual Version 19 published by the New York State Energy Research and Development Authority January 2025 p 20.

¹³ 225 CMR 20.07(4)a

¹⁴ H.B. 1111, 2025 Leg., 447th Sess. (Md. 2025).