

STATE OF NEW JERSEY  
Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350  
Re: Successor Program Capstone Report Docket No. QO20020184

To whom it may concern:

Proposed Successor Program TREC Factors

The proposed TREC factors incentivizes Subsection T, Subsection R rooftop and Net metered non-residential roof and canopy. The common denominator among these high TREC Factor locations is re-use of space already dedicated to another purpose, or to rehabilitate otherwise unusable land (ie Subsection T).

Absent from the Cadmus report is a specific TREC Factor for floating solar. Floating solar is generally located on reservoirs as the water surface is normally restricted, not accessible in most cases to fishing and pleasure boating and is solely dedicated to storage and treatment of drinking water. As such, use of existing reservoirs for floating solar is similar to Subsection T installation in that the spaces are already not usable for normal development. Additionally, several white papers have linked reservoir shading to reduction in harmful algae blooms. Where water utilities may previously have had to engage chemical control of algae blooms, shading (as that provided by floating solar) has a net positive effect upon the water quality of the reservoir.

Given the above, and that very few floating solar installations are in place, we suggest a TREC Factor of 1.0 to mitigate impediments to growth

Respectfully,



Daniel Grdovic  
*Senior Project Manager*  
*Edison Energy*