International Brotherhood of Electrical Workers

Local Union No. 269

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May 26, 2021

Aida Chamaco-Welsh, Secretary of the Board New Jersey Board of Public Utilities 44 South Clinton Avenue 3rd Floor, Suite 314 P.O. Box 350 Trenton, New Jersey 08625-0350

Email: board.secretary@bpu.nj.gov

RE: In the matter of the New Jersey 2019/2020 Solar Transition Solar

Successor Program: Staff Straw Proposal

DOCKET NO. QO20020184

Dear Secretary Chamaco-Welsh,

My name is Wayne DeAngelo, assistant business manager of the International Brotherhood of Electrical Workers Local 269, and I am submitting comments for the New Jersey Board of Public Utilities' (BPU) solar successor program today. As a leader of IBEW Local 269, we led the implementation of one of the state's first large solar panel systems to encourage energy independence and promote use of alternative sources of energy. Additionally, we partnered with Public Service Electric & Gas ("PSE&G") to build one of the largest State's solar project on a landfill property, providing an economically viable reuse of this otherwise blighted property and sharing its environmental benefits with adjacent communities.

Our members understand the critical role PSE&G and its Solar 4 All® Program play in New Jersey solar market first hand. We worked with PSE&G on the Parklands Landfill solar project, a 10MW power plant that covers 40 acres on a former landfill in Bordentown.

The BPU's solar successor program should continue to encourage these types of investments, repurposing landfills and brownfields that are likely to have significant upfront cleanup costs and low real estate development demand but can serve as a catalyst in expanding solar power and the green economy in New Jersey.

Parklands is one of 12 PSE&G landfill and brownfield sites that together encompass more than 260 acres and include 263,000 solar panels that generate clean, renewable energy for more than 14,000 NJ homes. While landfill and brownfield solar are historically among the most difficult projects to complete, their benefits are far reaching.

In addition to clean, renewable energy, these projects transform unused and often blighted properties into clean energy power plants. And perhaps most importantly, as New Jersey and the national recover from the economic impacts of the COVID-19 pandemic, solar projects create jobs and stimulate economic growth.

New Jersey is embarking on a path to reach 12.2GW of installed solar capacity by 2030, and 17.2GW by 2035, a goal that will require a build rate of 950MW per year, more than triple what the solar market has delivered annually over the past five years.

It is an ambitious target and the experience and technical expertise of utilities like PSE&G will significantly enhance the chances of success. In addition, a utility role in the expansion of solar in New Jersey will also increase participation from underserved and low- to moderate-income communities, and help address environmental justice issues facing many.

With so much at stake this is no time to shut out a tried and tested partner with a track record of delivering large, complex solar projects that serve the public interest. The expertise of our skilled workforce, IBEW LU 269, will further enhance the value of these projects and have a direct interest in the success of the program.

For these reasons, the 1,200 members of IBEW Local 269 supports an active role for utilities and PSE&G's Solar 4 All® Program in the state's effort to vastly expand the solar in NJ. Thank you for your time.

Sincerely,

Wayne DeAngelo