



New Jersey Community Solar Energy Pilot Program
BPU Docket No. QO18060646

Additional Comment from Gabel Associates in response to the BPU Notice of July 9, 2020

Dear Secretary Camacho-Welch:

Please accept this additional comment, which was inadvertently left out of the comments filed by Gabel Associates on August 9, 2020. My sincere apologies for the late submittal.

Question 13: Please provide feedback on Appendix C: Evaluation Criteria from the PY1 Application Form. In particular, please discuss:

- c) Are there criteria that were not considered in PY1 that should be considered in PY2? If yes, how would the Board evaluate, score, and verify these criteria?**

Response: The Board should add de-commissioned mining sites to the preferred siting evaluation criteria and score Applications accordingly. Just as landfills/brownfields are considered unique, so is the opportunity to bring useful-ness back to mining sites that are currently wasted space. A major benefit of siting on former mining operation is the location is already zoned for industrial use and have existing interconnection and electrical infrastructure. Furthermore, former mining sites are mainly located in rural South Jersey – offering the opportunity to bring Community Solar to the rural LMI without imposing on preserved lands, wetlands, forested areas, farmland. Or other open space. In sum, the application should 1) recognize the category of mining sites and 2) award them materially higher “preference” points.

Thank you for your consideration.

Sincerely,

Belle Gabel, Associate

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