

## Successor Solar Program Comments

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Thank you for the opportunity to offer comments on the New Jersey Solar Successor program.

To avert the rapidly approaching climate crisis, recent climate science tells us that greenhouse gas emissions from electricity must be reduced by 70% from today's levels by 2030 - worldwide, and certainly in New Jersey and our region. To responsibly address this new reality, New Jersey will need to increase the share of clean electricity it consumes beyond the current 50 by 30 RPS goals, to at least 90% clean energy, by the end of this decade.

It is also essential, for the sake of the climate and all its effects on our environment and our economy, that electricity remain affordable during this transition -- and it is abundantly clear that this can be done. Responsible GHG emission reductions and affordable electricity can both be achieved by choosing a careful mix of both New Jersey's internal solar and wind resources, which are relatively costly, and enough lower cost regional clean energy to ensure cost-effective emission reductions and affordable electricity. This choice must be made now, starting with keeping the Solar Successor program within a reasonable budget, and continue to be made until New Jersey has done its full share to avoid climate catastrophe.

Let me be clear - NJCF and our environmental allies support continued solar development in New Jersey as part of the clean energy mix needed to achieve aggressive climate goals while keeping clean energy affordable.

But currently, New Jersey solar is the most costly of all the available options. In addition to honoring the Clean Energy Act's cost caps, it is also critically important to keep clean energy affordable for consumers and to help spur rapid electrification of transportation and buildings.

The "sweet spot" that provides continued solar growth, rapid and deep emission reductions, and affordability will be a combination of New Jersey solar, offshore wind, and regional wind and solar. Finding this sweet spot will ensure that the environment gets a big emissions bang for each dollar spent and that costs remain affordable for consumers and for electrification - while cost-effective in-state solar deployment continues to grow.

The solar successor proceeding is central to addressing these very issues. Decisions about the quantity, type and timing of new solar resources in New Jersey can either support efforts to avert climate disaster or undermine them. It is a choice that must be made, starting with the Successor program.

We strongly support the budget-based, competitive framework developed by BPU staff for the solar successor program as the best way to make the right choice. Using this framework, the Board can determine the best combination of growth in New Jersey solar and new regional resources that fit within a reasonable budget. This budget-based approach is required to keep costs affordable, both in meeting the current 50% goal and in taking all the additional, rapid steps needed to avoid climate catastrophe.

So, why does affordability matter so much to the environment?

Clean electricity is the core engine required to remove emissions from New Jersey's building and transportation sectors, which account for 68% of New Jersey's greenhouse gas emissions. Affordable electricity means that consumers will save money when choosing electric vehicles, and heat pumps for their homes and businesses. The sooner consumers adopt electric vehicles and heating equipment, the sooner we will see emissions go down to the levels needed to avert the climate crisis.

For this reason, higher priced renewable energy is actually a barrier to achieving the GHG reductions needed in time to avert the crisis. So, for the sake of the environment, the state's policies must support the deployment of a highly cost-effective, competitive mix of clean energy resources to ensure rapid electrification.

Clean electricity generation also is what reduces CO2 emissions from fossil generators. Low-cost new clean electricity resources are essential because of the vast number of tons of CO2 - we estimate some 30 million metric tons each year -- emitted by generating the electricity we consume in New Jersey in the next decade.

Climate science tells us most of these electric sector emissions need to be eliminated in this decade. That simply won't be possible if we spend all of our clean energy budget on the most expensive resources. So again, for the sake of a safe and healthy climate, state policies must support and develop a highly cost-effective, competitive mix of clean energy resources, starting now. The successor program builds on the last three years of hard work by the BPU Commissioners, staff and our solar colleagues in crafting much more competitive and cost-conscious solar incentives, which will drive continuous cost reductions in solar power and ensure continued growth in New Jersey of this important resource. It hasn't been easy, but it is essential for our collective future.

We look forward to providing more detail in our written comments.