

May 10, 2021

Ms. Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

**RE: New Jersey 2019/2020 Solar Transition
Solar Successor Program: Staff Straw Proposal
DOCKET NO. QO20020184**

Dear Secretary Camacho-Welch:

Mercer County Improvement Authority (the "MCIA") appreciates the opportunity to comment on the New Jersey Board of Public Utility's (the "NJBPU") Staff Straw Proposal on the Solar Successor Program. The mission of the MCIA is to serve the needs of Mercer County (the "County"), improving the quality of life for the residents by providing programs and services for the County, Municipalities, school and fire districts, and not-for-profits in the areas of financing, project management, redevelopment, solid waste, and recycling. As part of this mission, MCIA desires to increase solar development in the County, hence our interest in this matter.

Upon review of Staff's Straw Proposal, the MCIA has serious concerns that the figures in the proposal will handicap the opportunity for the MCIA to pursue solar energy projects. Unfortunately, if the MCIA cannot capture sufficient savings from a solar project, the MCIA cannot justify using precious resources and bandwidth towards solar development. This will be the situation under Staff's 15% savings assumption. The loss of this opportunity will deprive residents of the County of energy savings and harm our effort to support green energy. To make this endeavor worthwhile, solar projects must see savings more in the range of 30 to 35%.

Furthermore, the Straw Proposal does not properly encourage and reward the development of solar canopies. The NJBPU has made clear that land use is a serious consideration when it comes to solar development in New Jersey. Solar canopies are suspended over a parking lot, and as such, they offer a more efficient use of space than ground installations. The incentive value of \$85 is simply not reasonable or sufficient to incent solar development, especially in conjunction with the 15% savings assumption.

Ms. Aida Camacho-Welch

May 10, 2021

Page two

The MCIAs offers these insights from the position of a utility customer and a public entity serving the approximately 370,000 residents of Mercer County. As such, our perspective deserves special consideration. For the sake of the residents of Mercer County, we urge Staff to increase the savings assumptions of the Straw Proposal to 30-35% and increase the \$85 incentive value of solar canopies.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip S. Miller". The signature is fluid and cursive, with the first name being the most prominent.

Phillip S. Miller

Executive Director