



SUBMITTED VIA EMAIL
board.secretary@bpu.nj.gov

May 27, 2021

Aida Camacho-Welch, Secretary of the Board
Board of Public Utilities
Trenton, NJ 08625-0350

RE: Docket No. QO20020184 – Solar Successor Program

Dear Secretary Camacho-Welch,

KDC Solar LLC (KDC Solar) has been an active member of the New Jersey solar marketplace since 2010. Our area of business focus has been net-metered C&I, institutional (public & private) and grid supply landfill/brownfield. In addition to development and construction management, KDC Solar has maintained ownership in number of the developed projects. Since our inception the company has also focused on policy and education at the local and state levels.

The purpose of this correspondence is not to reiterate comments KDC Solar has made during the Workshops held over past 2 months, but to highlight four areas we believe most impact the industry in NJ and our specific segment focus.

Cost Cap

We continue to seek “full credit” for solar to be included in any calculations pertaining to the “cost” of solar energy. In addition to assigning economic value to the environmental attributes resulting from solar generation, the financial savings in market Energy, Capacity and Compliance costs for consumers need to be fully recognized when determining the “NET” cost to consumers/ratepayers of New Jersey domiciled solar energy.

Preferred Siting

Dating back to the origins of the SREC program and highlighted in subsequent Energy Master Plan landfills, brownfields and carports have been highlighted as areas desirable for solar development to be focused. Given the respective nature, these projects (constructing on a landfill or solar project 12’ in the air) are more expensive to complete compared to ground mount and roof projects. We would argue the benefits more than offset the incremental economic costs and as such should continue to be incentivized with a multiplier in the Successor Program and set initial incentives at current TREC levels.



Completion Date

We ask the Board to consider a longer period of time for C&I and grid-supply projects to reach COD while preserving its incentive qualification. The interconnection and permitting lead times are lengthy and not expected to change in coming years. DEP and CAFRA approvals can take more than six months for a project. We ask that the Board reconsider finite timelines and, in its place, consider proof of progress for projects to maintain project eligibility for the incentive it was awarded.

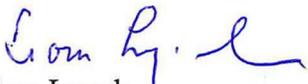
Net-metered Projects

We believe that ALL net-metered projects should be in an administratively set incentive program regardless of project size. We would also point out that just because a project may be larger does not necessarily mean that its cost/watt is lower. Larger projects will have prevailing wage minimums and typically higher interconnection costs compared to projects under 2MW. These projects offer dual benefits to NJ, benefits of renewable distributed generation and lower cost of electricity to an employer located within the state.

SEIA / NJSEC have shared with KDC Solar their joint submittal and we would like the Board to know that KDC Solar agrees with the conclusion and recommendations set forth in their document.

We look forward to continuing to have a role in NJ solar and appreciate the opportunity to voice our thoughts and submit written comments.

Respectfully submitted,


Tom Lynch
Executive Vice President & COO