



**May 27, 2021**

Aida Camacho-Welch  
Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Trenton, New Jersey 08625-0350

*Re: Enel North America Comments regarding Docket No. QO20020184, Solar Successor Program*

Enel North America appreciates the Board of Public Utilities' ("BPU") initiative in releasing the Solar Successor Program. More broadly, we're grateful for the BPU's focus on ensuring that New Jersey can accomplish its clean energy objectives in a reliable, cost-effective manner. As one of the world's largest utilities and global developer and operator of renewable capacity, we enthusiastically support state policies for rapid decarbonization and clean energy deployment.

Enel Green Power North America is a leading owner and operator of renewable energy plants with a presence in 14 US states and one Canadian province. The company operates 58 plants with a managed capacity of over 6.6 GW powered by wind, geothermal and solar energy. Enel X in North America has around 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW of demand response capacity and over 70 battery storage projects that are operational and under contract. Enel X is revolutionizing the EV charging market with its smart charging solutions deploying over 70,000 charging stations in the US.

Enel has ambitious development plans throughout the PJM region and is eager to expand its clean energy leadership in New Jersey. Enel has been partnering with commercial & industrial customers in NJ for nearly 15 years, helping them monetize their flexibility in the PJM demand response program. Enel also provides electric vehicle supply equipment to customers in New Jersey and is actively developing clean energy projects across the state.

Enel strongly supports the joint comments submitted to this proceeding from the American Clean Power Association (ACP) and the Mid-Atlantic Renewable Energy Coalition (MAREC) and the joint comments from the Solar Energy Industries Association (SEIA) and the Energy Storage Association (ESA). Please refer to these comments for specific issues and recommendations for how to develop a Solar Successor Program that works not just for developers but for ratepayers as well.

Despite our support for much of the Solar Successor Program design, the proposed restrictions on agricultural development threatens the program's potential success and benefits. Here, the BPU proposes to allow no greater than 5% of the grid supply solar facilities planned on unpreserved farmland to be located within a county's designated Agricultural Development Area that includes prime agricultural soils and soils of statewide importance. We urge the Board to consider the impermanent nature of solar installations. Land which hosts a solar array can retain its fundamental character and after 2-3 decades of producing clean, carbon-free energy can be returned to future agricultural use.

Moreover, the stable long-term revenues that a solar lease can provide to an agricultural landowner often contribute positively to helping family farms remain in the family.<sup>1</sup> Many farmers, even those working land that includes prime soils, face difficult economic decisions about how to use their land and some find that even prime soils in Agricultural Development Areas cannot be economically farmed. These landowners often must choose between installing solar panels, which continue to promote beneficial soil and groundwater impacts, and converting even those prime soils to permanent non-agricultural uses. Overly strict limits on participation of projects on prime soils in the Successor Program grid supply opportunities may force more of such lands out of agricultural use permanently and actually impair open-space preservation goals.

Finally, as outlined in the trade association comments, the Board should refine the competitive solicitation program design to account for financing hurdles for developers and the need for reasonable siting requirements.

We appreciate the BPU's careful consideration of the program design and openness to input from industry stakeholders who bring decades of experience developing renewable energy projects across the country. Enel is ready to invest in helping New Jersey meet its clean energy goals, and looks forward to collaborating with the BPU to craft a successful program..

Collectively, these recommendations will help ensure that New Jersey maintains its place as a national leader in solar and achieves the state's aggressive clean energy goals. Thank you for considering these recommendations.

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<sup>1</sup> See North Carolina Sustainable Energy Association, [North Carolina Solar and Agriculture](#), p 9 ("solar installations generate about 30 percent of the income of a whole farm while occupying about 20 percent of the land").

Respectfully,

/s/ Adam Stern

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