



New Jersey Environmental Lobby

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May 27, 2021

Ms. Aida Camacho-Welch
Board of Public Utilities
P. O. Box 350
Trenton, NJ 08625-0350

Sent by email to: board.secretary@bpu.nj.gov

Subject: Comments Regarding Docket No. QO20020184, Solar Successor Program
by Anne O. Poole, President, New Jersey Environmental Lobby

Dear Ms. Camacho-Welch:

For almost fifty years, the New Jersey Environmental Lobby (NJEL) has been an advocate for clean air and clean water. With a few other environmental partners, NJEL promoted and explained renewable energy to the public, before most had heard of the concept. Since then, NJEL has lobbied for public policies that would increase the share of renewables in the State's energy portfolio and has educated the public about the need to reduce the use of fossil fuels. Most of this was in the interest of clean air. Now, it is also about reducing the impacts of climate change.

We welcome the BPU's Notice of the Solar Successor Program as a tool to reach the State's renewable energy goal. The vision of the Straw Proposal is clearly to make solar power more accessible to consumers. We do note, however, that the Proposal does not recognize that the solar initiatives of the State's electric distribution companies (EDCs), as well as their unique positions in their service areas, could be used to expand solar power generation expeditiously.

The solar installation target for 2030 alone would require an annual build rate of 950MW. This is almost triple the rate of the last five years. The Straw Proposal, while carefully crafted, is based on assumptions of developer and community behavior. The EDCs already have a history of performance in solar development, knowledge of the unique needs and preferences of New Jersey's communities, and expertise in industry standards. Yet, New Jersey's grid supply of solar power lags behind that of other leading solar states: average grid supply of solar is 60%, while New Jersey's is only 20%. This is a logical place to expand solar capacity. With the impacts of climate change that New Jersey in particular is facing, every possible market sector must be utilized to reach the renewable goal. The Globe and the State are experiencing a crisis.

Based on our knowledge of PSE&G's Solar 4 All Program, as well as PSE&G's previous initiatives in renewable energy and energy efficiency, we believe that Solar 4 All is an obvious vehicle for expanding New Jersey's solar generation. We respectfully ask that the Board include the Solar 4 All Program and EDCs in general, in the Solar Successor Program. The EDCs have the technical expertise, customer relationships, and--because of their regulated status--the transparency, to contribute substantially to the solar goal, and to contribute quickly.

NJEL particularly endorses utilization of contaminated sites for solar arrays. We also strongly approve of the prohibition of utilizing preserved farmland, Green Acres-funded land, and other categories enumerated on page 21 of the Proposal. We are concerned about the language regarding petitions for permits on otherwise prohibited lands. We understand that there may be valid reasons for siting on such areas, but New Jersey's history shows that "consultation" with other agencies does not always result in the best land conservation decision. We would expect that local residents, conservation and wildlife experts, and the public at large would be included in those decisions, with adequate notice and time to comment.

PSE&G's extensive experience with brownfield-solar conversions is also a reason that the Solar 4 All Program should be part of the Successor Program. Solar 4 All® has built 158MW of landfill, brownfield, rooftop, parking lot and pole-attached solar in New Jersey. That portfolio includes 12 solar farms on landfill or brownfield sites that encompass more than 262 acres and include 263,000 solar panels that can generate more than 86MW of power. One landfill project includes an energy storage component, a technological advancement that helps integrate solar into the electric grid. PSE&G's Solar Loan financed more than 145MW of residential, commercial and brownfield installations.

Landfills and brownfields have historically been difficult to redevelop. PSE&G has worked with landfill and brownfield owners to repurpose sites with solar and return impacted properties to productive use as clean energy power plants. This is particularly important in New Jersey, with its industrial legacy and an overwhelming number of contaminated sites in proximity to overburdened communities. While regulated utilities have become sensitive to the needs of urban and disadvantaged communities in their service areas, there is no guarantee that other solar developers will have that sensitivity or will be interested in those sites. The Pennsauken Solar Farm, built on a former manufacturing site, was recognized as a "Brownfield Success Story" by the NJ Brownfields Assistance Center at New Jersey Institute of Technology. The regulated utilities are in a unique position to accomplish the dual goals of solar expansion and community revitalization.

Thank you for considering these comments.

Sincerely,

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