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Ms. Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Ave, 9th Floor
P.O. Box 350
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(Sent only by electronic mail)

Comments regarding Docket No. QO20020184, Solar Successor Program

To Ms. Camacho-Welch and the NJ Board of Public Utilities,

I am writing to provide comments on the Solar Successor Program, with special attention to question #39 in the comments prompt: *“39. Please comment generally on whether the Board should consider maintaining the competitive solicitation for community solar projects in the Permanent Program, or if it should adopt strict qualifications and otherwise establish a first-come, first-served model (detailed as Option 1 and Option 2 on pages 40-41).”*

Soltage supports the competitive solicitation for community solar projects in the Permanent Program. There are two major reasons that Soltage supports the competitive solicitation rather than a first-come, first-served model:

1. The NJBPU received 800MWdc of applications for Year 2 of the Community Solar Energy Pilot Program, all applying for the 150MWdc of Year 2. This implies an excess of 650MWdc worth of community solar projects, and implies that only about 19% of applicant megawatts will be approved. With a competitive solicitation process, the quality of the projects determines which projects are approved; with a first-come, first-served process, most applicants will apply their projects right away when the application submission period begins, and the determining factor of which projects are approved may very well be the internet speeds of the applicants and/or the distance of the applicants' computer servers from the application web portal servers. Using Year 2 of the pilot program as an example, even if we assume that half of the applications do not meet the stricter qualification requirements contemplated for a first-come, first served process, that would still be 400MWdc applying for 150MWdc per year (or 400MWdc applying for 37.5MWdc per quarter), and the determination of which projects are awarded could come

down to internet speeds and distance between computer servers. Surely this is not how such a vital and substantial state program should select its winners and losers. One solution to this issue could be to consider all applications received on the same day to have been received at the exact same time; that is, to disregard minutes and hours on an application's timestamp and instead defer to the day of the application submittal. However, even this would likely result in a tie between hundreds more MW worth of applications than any given quarterly solicitation can approve, for example 300MWdc of applications could be submitted on the first day of the application period for a quarterly application period of 37.5MWdc. (Perhaps a compromise here is to use a day-based rather than minute- or hour-based application timestamp, *plus* a point-based system in order to break ties between applications submitted on the same day.)

2. The ancillary community benefits of New Jersey's community solar program are substantial and have been driven largely by the point-based competitive solicitation process. Some of these benefits could be made requirements in a first come, first served program, such as committing 51% of a project's allocation to low- and moderate-income residents, but other various benefits, such as extra discounts or free energy to local nonprofit groups, job training workshops, pollinator habitats, electric vehicle charging stations, and any number of other ancillary benefits, would be cumbersome and perhaps non-financeable to require of all projects through the entire permanent community solar program. Instead, the competitive solicitation process that allows for qualitative evaluation of an applicant's ancillary benefits to the communities they serve is the best way to ensure that these benefits are maximized and meet the specific needs of the local communities.

Besides this particular question #39, Soltage generally supports the position of the Coalition for Community Solar Access in its comments letter regarding the SREC Successor Straw Proposal, especially but not limited to the needs to re-allocate unused capacity from one solicitation period to future solicitation periods and across project types, as well as the vital requirement for EDCs to include both feeder hosting capacity data *and* substation transformer data on their public hosting capacity maps, the need for EDCs to keep their hosting capacity maps updated on a monthly basis, and the need for all EDCs to provide pre-application reports. Of all the ways to protect New Jersey's community solar program from unfeasible projects that become "queue-squatters," these simple changes to EDC requirements are the best way to protect the program while keeping the program financeable with a barrier-to-entry low enough as to be in line with the energy equity goals that makes New Jersey's community solar program an exemplary program for the entire nation. Requiring applicants to complete lengthy and expensive interconnection studies before even being approved into the community solar program would have the opposite effect; it would discourage development, increase barrier-to-entry, and hurt the program at large.

Soltage appreciates the opportunity to participate in New Jersey solar programs and its stakeholder processes.

Sincerely,

Zac Meyer

