



January 21, 2020

New Jersey Board of Public Utilities
44 S. Clinton Ave
Trenton, NJ 08609

Re: The need for substation transformer data and timely updates on Electric Distribution Companies' hosting capacity maps, and preliminary interconnection applications, for success of the Community Solar Energy Pilot Program

To the New Jersey Board of Public Utilities:

The Coalition for Community Solar Access (CCSA) writes to alert the Board of a potentially major issue with the Electric Distribution Companies' hosting capacity maps. The Codes and Standards section of the Community Solar Energy Pilot Program Rules (14:8-9.9 of 51 N.J.R. 265) states "The EDCs shall make available and update, in a commercially reasonable fashion, capacity hosting maps, within 90 days of the beginning of PY1." While the four EDCs of New Jersey did publish hosting capacity maps within 90 days of the beginning of Program Year 1, only Atlantic City Electric's map shows both i) feeder available capacity and ii) substation transformer available capacity. The other three EDCs – PSE&G, JCP&L, and Rockland Electric Company – provided hosting capacity maps that do not provide substation transformer available capacity.

Both the feeder and substation transformer must have available capacity for a project to interconnect successfully and therefore commercially useful capacity maps should provide information about both feeder available capacity and substation transformer available capacity. Unless and until this information is provided, it is impossible for either the applicant or the Board of Public Utilities to realistically assess interconnection viability for any proposed community solar project in PSE&G, JCP&L, or Rockland Electric Company territories. This poses a serious risk that a great number of awarded projects will drop out of the program after award, once the project files a formal interconnection application and the true interconnection viability is learned.

As an example, as of January 21, 2020, feeder NJ0424 on Atlantic City Electric's hosting capacity map shows 3,000.00 kW listed for "Max large system size restriction for feeder" and 8,908.00 kW listed for "Max large system size restriction for sub transformer." A solar developer looking at this listing has a commercially reasonable understanding that a community solar project up to 3,000.00 kW will viably connect to the substation transformer listed here, because the hosting capacity map provides both feeder and substation transformer information. On the other hand, at an interconnection point on the JCP&L hosting capacity map that only has one data point, called "Remaining kW", even if the dot is green and the capacity listed is, say, 3000 kW AC, nobody looking at this information knows whether the substation transformer that this feeder leads to has any available hosting capacity. The person viewing the map may take the one data point at face value, especially with no alternative information because the EDCs are not processing preliminary interconnection applications for community solar projects, and then go on to spend significant time and money on lease or purchase option payments, permitting



diligence, community engagement, and other diligence and application preparation. Only after the project is selected into the Community Solar program would it become commercially reasonable to submit a formal interconnection application, costing approximately \$1 to \$2 per kW, and then after this interconnection application is processed, the applicant will finally gain a realistic understanding of interconnection cost and viability. For this reason, of the four EDCs, only Atlantic City Electric is currently providing a commercially reasonable capacity hosting map.

The CCSA respectfully requests the Board of Public Utilities to require all the EDCs to include substation transformer data on their hosting capacity maps. While the CCSA understands and acknowledges that the hosting capacity maps are not meant to provide exact final interconnection cost estimates or viability details from an engineering or construction point of view, the fact that Atlantic City Electric has provided substation transformer data on their hosting capacity map – and should be applauded for doing so – implies that this data is known or calculable to the EDCs. Furthermore, the CCSA respectfully requests the Board of Public Utilities to require all the EDCs to update their hosting capacity maps every month.

In addition, CCSA respectfully requests the Board of Public Utilities to require all the EDCs to offer preliminary interconnection applications, a service that is generally available from other utilities across the country. Although this entails a little more upfront work for the EDCs, a “pre-app” saves time for all parties—the EDCs, the applicant, and the Board of Public Utilities—by quickly eliminating non-viable interconnection requests.

We request that these updated requirements be made in a timely manner, in time for the Program Year 2 Application Deadline. This is for the benefit not only of applicants into the program, but also for the benefit of the Board of Public Utilities in the process of determining which applications are viable, and for the benefit of the Community Solar Energy Pilot Program as a whole.

Respectfully submitted,

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Coalition Community Solar Access