



May 27, 2021

Via Board's External Access Portal only

New Jersey Board of Public Utilities
c/o Board Secretary Aida Camacho
44 South Clinton Ave, 9th Floor
PO 350
Trenton, NJ 0825-0350
Board.secretary@bpu.nj.gov

Re: Comments Regarding Docket No QO20020184 Solar Successor Program

Dear Secretary Aida Camacho and Commissioners,

CS Energy is pleased to submit the following comments on the New Jersey Solar Successor Program Straw Proposal (Straw Proposal). We appreciate the hard work and leadership from BPU Staff in developing the Straw Proposal and thoughtful questions for the industry to comment. We look forward to working with the BPU to ensure a successful Successor program that creates a strong renewable industry for small BTM and large-scale utility markets.

Governor Murphy's Energy Master Plan ("EMP") outlines the goal of achieving 12.2GW of solar renewable energy to be installed by 2030 and 100% clean energy by 2050. These goals require that New Jersey install more than 950 MW per year, which would be a threefold increase over installation rates during the previous five years. Given this is a very ambitious target it requires input, participation, and collaboration from the many stakeholders within the State to allow for the successful implementation of the Successor Program.

Headquartered in Edison, NJ, CS Energy is the industry-leading engineering, procurement, and construction (EPC) energy firm that designs and builds optimized projects in solar, energy storage, and emerging energy industries. We have been a long standing participant in the NJ markets since 2007 and have installed many flagship projects in the State, including the first landfill project in 2011, the largest single interconnection project under Subsection (r), multiple subsection (t) projects, and developed and built the soon to be operational Linden Landfill Community Solar Project, among the first community solar projects completed. CS Energy has successfully designed and installed over 1.3 GW of solar projects across the United States, of which over 160MW have been in NJ. We are especially experienced in landfill solar having installed 180 MW of the solar projects have been on landfills of which 75 MW have been in New Jersey landfill projects.

CS Energy is a participating member of the New Jersey Solar Energy Coalition ("NJSEC") and have collaborated with NJESC on their written comments. However, given the importance of creating a successful Successor program and our specific experience and grid-scale market

Building a Cleaner Future

participation, we are compelled to submit the enclosed comments to underscore and reiterate comments provided by NJSEC and also provided additional specific suggestions.

Our comments are organized with an opening narrative section explaining our positions followed by specific answers to the questions posed by the BPU. These answers are designated using [blue text](#). Unless otherwise specified, failure to comment on any specific question should be interpreted to mean that our organizations do not take a position on the matter at this time.

Overall Program Design

CS Energy agrees with many comments provided by NJSEC and offer the following additional points and reiteration of NJSEC's comments. We believe that: 1) the administratively set incentives are too low to support these projects, 2) the straw proposal has overly restrictive solar siting requirements, 3) the tranches for competitive solicitation are inadequate, 4) Brownfield or Subsection (t) Projects, or otherwise "contaminated sites" must not be placed in a competitive solicitation, and 5) more specific details are needed with respect to encouraging the deployment of energy storage resources.

Administratively Determined Incentives

CS Energy believes that the following project categories should have administratively set incentives

1. Brownfield / Landfill / Historic fill / "Contaminated Sites" / etc. – These projects are preferred by the State and communities in which they are developed. They often include some level of remediation or improvement to the environmental to receive their DEP permits, are often municipally owned – allowing private industry to support remedial action on sites that would otherwise be left unaddressed, re-develops land that otherwise would not be able to utilized, and is in-line with the States objectives. However, these sites are especially risky, time consuming, and considerably more expensive to develop and build. For this reason, these projects require certainty in the form of a sufficient fixed incentive to encourage development of these risky sites.
2. Community Solar – For similar reasons as projects on contaminated sites in (1) above, community solar should also have a fixed incentive. Securing LMI subscriptions and development of these projects is challenging and expensive. Additionally, at this time the industry does not know what the attrition and subscriber management will be for operational projects. There is significant risk from subscriber loss and even policy changes as the BPU rolls out the permanent program that could negatively impact the early adopters of community solar projects. The community solar program must have a steady incentive to balance the risk of the risk of subscriber management. Additionally, providing

a fixed incentive would align with the Murphy Administration’s goal of making this segment a priority.

3. Behind the meter / Net Metered Systems. – we agree with the comments of NJSEC in this category.

Competitive Solicitations

CS Energy shares NJSEC’s recommendations and add, as noted above, that “Subsection (t)” projects should not participate in the competitive solicitation because it would not provide the certainty required to justify the additional cost and risk of developing these important and priority sites

We further recommend that competitive solicitation be broken into specific tranches where projects would compete against other similar projects in order create a level playing field across the different project types. We suggest the competitive solicitation have two distinct tranches whereby projects in a specific tranche compete only against other projects in the same tranche:

- a) Preferred Siting – including projects located on rooftops, carports, and non-agricultural ground mounts
- b) Non-Preferred Siting including projects located on non-preserved agricultural land

We believe that establishing these two competitive tranches would enable projects to compete fairly against other similar projects, would provide adequate incentive to stimulate development, and would provide good value to ratepayers.

Finally, we encourage the BPU to establish reasonable thresholds that developers would need to exceed in order to be eligible to participate in the competitive solicitation. This will ensure that projects that are awarded contracts in the solicitation have a high likelihood of being built and will minimize the risk of developers bidding in very early stage projects that never materialize and turn into “ghost projects”.

Establishing Reasonable Solar Siting Requirements

We agree with the comments provided by NJSEC and would like to underscore their points on overly strict siting requirements and urge the board to expand the land available grid size development

There are simply not enough parcels to develop to achieve the RPS goals under the siting criteria in the Straw Proposal. We have performed a GIS based analysis to align parcel screening with the straw proposal for the development of larger 10MW+ grid tied projects. The analysis used similar site requirements as used in the Straw Proposal and removed all parcels that were forested, encumbered by wetlands or flood hazard areas or other ecological barriers, open space, pinelands, highlands, preserved farmland, in a County ADA, and 20 or more acres so they could

support a grid tied project. The analysis yielded only 280 parcels, of which only 5 are reasonable to develop – the non-developable areas included sites like schools, cemeteries, shopping centers, active landfills, seaports, sport centers etc. Removing the agricultural development exception would better align with the State’s RPS goals while also protecting all preserved farmland.

Solar for All:

One of the involved parties that plays a role in the achieving the State’s energy target are Utilities. CS Energy would like to support the involvement of utilities like PSE&G participating in New Jersey’s solar market across various project types while continuing to grow the robust industry of private developers and related companies that has been established in New Jersey. Stakeholders working seamlessly together will create an environment where various project owners can play a key role and contribute to the achieving the overall renewable goals of the State.

CS Energy has worked with PSE&G since 2011 to support the build out of their Solar 4 All® Program. This partnership has yielded the construction of 42+ MW of landfill solar projects that PSE&G owns and operate. All of these projects have been built on existing closed landfills utilizing the local NJ union workforce creating job opportunities in the State. We would support a continuation of the Solar 4 All program.

Conclusion

We appreciate the hard work by BPU to design a durable successor solar incentive program and believe these comments capture recommendations that will help ensure that the Successor program will continue to create jobs in the New Jersey, support local economies, and help businesses, homeowners, schools, hospitals, and local governments save on their electricity bills. CS Energy strongly recommends that BPU consider our enclosed recommendations and set appropriate incentive values for the commercial solar, carports, community solar, and “Subsection (t)” market segments, create competitive solicitation with appropriate barriers for entry that encourage development but do not fill the queue with losing projects and separate between preferred and non-preferred siting, and adjust siting requirements that will actually support a grid tied solar sector which will be **critical in achieving the ambitions RPS goals**. Thank you for considering these recommendations.

Sincerely,



John Ervin
Director of Development
CS Energy
jervin@csenergy.com
732-354-2184

Part II- Answers to Specific BPU Questions.

Overall program design: Staff proposes to establish a bifurcated Solar Successor Incentive Program in which residential projects, community solar projects, and non-residential net metered projects 2 MW or smaller are offered and administratively set \$/MWh incentive. All other projects would participate in the competitive solicitation.

1. Please comment on the benefits and consequences of this suggested division. Does this program design provide a pathway to maximizing solar development while minimizing ratepayer costs and supporting the industry? Please explain and include alternative suggestions if you believe there is a better approach that Staff should consider.

With SEIA and NJSEC, CS Energy generally supports the Straw Proposal’s recommendation to establish a bifurcated Solar Successor Incentive Program in which some projects participate in an administratively set program and some in a competitive solicitation. However, we believe that projects located on contaminated sites (i.e. “Subsection (t) type” projects), regardless of their size, must be included in the administratively set incentive. These projects are preferred by the state and communities where they are developed. They often include some level of remediation or improvement to the environmental to receive their DEP permits, are often municipally owned – allowing private industry to support remedial action on sites that would otherwise be left unaddressed, re-develops land that otherwise would not be able to utilized, and is in-line with the State’s objectives. However, these sites are especially risky, time consuming, and considerably more expensive to develop and build. For this reason, these projects require certainty in the form of a sufficient fixed incentive to encourage development of these risky sites.

Administratively determined incentive for small net metered and all community solar projects

2. Please comment on the proposed breakdown of market segments in the administratively set program (e.g., net metered residential, net metered non-residential rooftop and canopy, net metered non-residential ground mount, community solar, and LMI community solar). Would you suggest any changes, and if so, why?

We believe that all net metered, community solar, and “Subsection (t) type” projects be administratively set, regardless of their size.

Other projects may be competitively solicited, with appropriate barriers for entry, and with separate tranches for projects with preferred siting and those with non-preferred siting.

The administratively set incentive will continue to drive the market segments that have been so important to the renewable energy development in the State – residential, commercial, and contaminated sites. These markets have supported many jobs in the state and have been the backbone of the industry thus far. Further, administratively set incentives should be aligned with the States goals so that the industry is encouraged to focus their efforts with the State’s preferences. This means supporting community solar, the large job creator in residential and commercial solar, and development of barren, contaminated, and underutilized land.

3. As currently proposed, all net metered projects in the administratively set program would qualify for an incentive of \$85/MWh for the first three-year period (EY 2022-2024); community solar projects would qualify for an incentive of \$70/MWh, and community solar LMI projects would receive an incentive of \$90/MWh. Please comment on these proposed incentive levels and if you disagree, please reference specific concerns with the modeling or historic performance assumptions used to develop the proposed levels.

[We are supportive of the comments provided by NJSEC.](#)

4. The Straw proposes that selected projects would receive a 15-year qualifying life, consistent with the TI Program. Staff seeks comments on whether this is the appropriate term due to the nature of heavily discounting outer-year incentives, as well for consistency with the proposed competitive solicitation program. Please comment on this proposal and explain any alternative suggestions.

[We are supportive of the comments provided by NJSEC.](#)

5. Staff proposes to establish annual capacity allocations for each market segment on an annual basis, as discussed in the Cost Cap section. The annual program capacity allocation would be divided (by four) into a quarterly allocation. Developers would then be able to reserve a spot within each quarter’s capacity allocation.
 - a. Staff proposes to allow projects to reserve capacity against the quarterly capacity allocation on a first-come, first-served basis. Please provide any comments on this proposal.

[We are supportive of the comments provided by NJSEC](#)

- b. Staff anticipates that there may be situations in which a quarter’s allocation becomes over-subscribed. How should the Board handle over-subscription?

[We are supportive of the comments provided by NJSEC](#)

- c. What different or additional measures could the board take to ensure that there is sufficient opportunity to participate in the incentive program throughout the year?

[We are supportive of the comments provided by NJSEC](#)

6. Concern of “ghost projects” or “queue sitting” threatens the productive functioning of the incentive program. Please comment generally on the slate of project maturity requirements as proposed on page 13 of the Successor Straw or suggest alternative bidding requirements, including minimum criteria to demonstrate project maturity, site control, or escrow amounts to discourage speculation.

[We are supportive of the comments provided by NJSEC](#)

7. Staff proposes that projects awarded within a quarterly window pay a fee to the program administrator to cover the costs of administering the program. The fee would vary based on project size (under 25 kW, between 25 kW and 500 kW, and over 2 MW). Please comment on what fee should be required for the three project sizes.

[We are supportive of the comments provided by NJSEC](#)

8. Staff proposes that developers seeking an extension beyond the initial 12-month deadline must submit a deposit, refundable upon project completion, equal to 10% of the project cost and not to exceed a value determined with stakeholders. Please comment on how Staff should determine the deposit fee for a deadline extension request.

[We are supportive of the comments provided by NJSEC](#)

9. Staff proposes to set incentives every three years to provide market certainty. However, using an administratively set incentive risks the potential for market under or over performance in any particular sub-market. What measures could be used to stop an overheated market and prevent inefficient use of incentive funds? Should the Board consider implementing measures such as a declining block structure, downward adjustments on the quarterly capacity allocation for the market segment, or others? How should the Board consider and assess market underperformance?

We are supportive of the comments provided by NJSEC

10. What are the benefits and consequences of allowing or prohibiting behind-the-meter projects in non-EDC territories to register in the Successor Program?

We are supportive of the comments provided by NJSEC

Competitive solicitation model for all grid supply projects and large net metered projects

11. Staff proposes to divide the competitive solicitation into four tranches to allow like projects to compete against like projects. The four tranches are designed to enable the Board to set policy preferences through the design and project requirements of the tranches, thereby enabling cost to be the single deciding factor in awarding bids in each tranche.
 - a. Please comment on the overall approach of using a cost-based bid determination within the four described tranches, rather than a single solicitation with a Staff-led scoring process, such as is currently used for the Community Solar Energy Pilot Program. What eligibility or other solicitation criteria could be established to enable competitive bids from a diversity of project types and market segments with divergent cost structures?

We are supportive of the comments provided by NJSEC and add that we strongly believe that it is inappropriate to include landfills and contaminated sites in the competitive solicitation. As stated earlier, these projects should be administratively set. The competitive solicitation should be limited only to grid-tied projects and may be broken out between 'desirable' and 'un-desirable' tranches. We do not feel that further granularity is necessary with our recommendations

- b. Please comment on the four proposed tranches: basic (i.e., open space) grid supply; desired land use (e.g., contaminated land, built environment); solar + storage; and net metered projects greater than 2 MW. Is this the optimal configuration for the competitive solicitation? Would you suggest any changes?

As stated before, we support a broad "preferred siting" category to include roof top, carport, etc. and a "non-preferred siting" tranche for more green-field type grid projects that are on agricultural land. It is important to acknowledge that this

recommendation is strictly paired with our suggestions in the administratively set categories.

12. Staff proposes to hold an annual competitive solicitation. Please comment on this proposed schedule. Specifically

a. Would you advise running the solicitations more or less often, and if so, why?

We believe solicitations should be more often. This will aid in creating a steady development / build timeline to meet RPS goals.

b. Can all four tranches be administered on the same schedule, or should one or more be run more or less often than the others?

We think it is most important to have transparency and visibility for when we can expect solicitations to be released for each of the tranches. We are less concerned with how they are staggered.

c. Should the program vary the solicitation frequency schedule based on liquidity in any given tranche? For example, if a given tranche fails to attract sufficient bids in one period, should the program provide extra time before holding the next procurement in that market segment?

We are supportive of the comments provided by NJSEC

d. Staff is particularly interested in determining if the net metered tranche should run more often than the grid supply tranches, and if so, why?

We are opposed to any competitive solicitation for net metered projects for reasons already posited, herein.

13. In the interest of procuring the maximum amount of solar energy and the lowest possible price, Staff requests feedback on whether projects awarded within the competitive solicitation should be paid-as-bid or receive a single clearing price.

We are supportive of the comments provided by NJSEC

14. Staff proposes that selected projects would receive a contract for REC off-take in a term of 15 years, due to the nature of heavily discounting outer-year incentives, as well for

consistency with the administratively determined program. Please comment on this proposal and explain any alternative suggestions.

[We are supportive of the comments provided by NJSEC](#)

15. Staff proposes that projects applying to the competitive solicitation must post a deposit equal to \$40/kW of DC nameplate capacity of the solar facility in an escrow account. Projects proposed with energy storage would be required to place an additional deposit of \$40/kW of nameplate capacity of energy storage offered. The escrow amount would be reimbursed to the applicant in full upon either (i) the project not being awarded a contract through the competitive solicitation, or (ii) upon attainment of PTO for the solar electric power generation facility. If a project is selected, the escrow will be forfeited to the State on a pro rata basis for any kW capacity that remains unbuilt after 2 years, plus any applicable extensions.

- a. Please comment on the proposed deposit fee(s) as they relate to the solar facility, whether it should be lower or higher, and why?

[We are supportive of the comments provided by NJSEC](#)

- b. Please comment on the proposed deposit fee(s) as they relate to the storage facility, whether it should be lower or higher, and why?

[We are supportive of the comments provided by NJSEC](#)

- c. The Straw Proposal seeks to ensure both strict project maturity requirements as well as general program accessibility. Please comment on whether the deposit should be required upon initial application or upon acceptance of a bid. In the alternative, should the Board require a lower deposit for initial application, followed by the balance due upon award?

[We are supportive of the comments provided by NJSEC](#)

16. The Straw proposes to include a tranche restricted to hybrid systems (solar and energy storage) in the competitive solicitation. Staff seeks commentary on the following:

- a. The Straw proposes establishing a \$/MWh incentive for hybrid systems would be administratively simpler than establishing separate contracts for the storage and solar components. Please comment on this approach.

We are supportive of the comments provided by NJSEC and add that we do not think that a separate tranche for solar + storage projects is beneficial, instead we believe that the inclusion of storage should be a fixed added incentive per MWh. i.e. if storage is a component of a project, whether it be participating in the administrative set incentive categories or competitive solicitation categories, the inclusion of storage would be an adder to the solar incentives based on the characteristics (duration or capacity or some combination as utilized in the California SGIP incentive) of the storage project.

- b. How should the competitive solicitation account for battery degradation? For example, should applicants be required to commit to minimum performance metrics in order to qualify for the solicitation? Should applicants be required to commit to maintaining their stated capabilities until the end of the term? What criteria and documentation should the program administrator require as evidence?

We are supportive of the comments provided by NJSEC

- c. Please address how the competitive solicitation should normalize bids associated with different MW and MWh capabilities. Should the Board require pricing based on specific battery sizes to enable clear bid comparisons, or should the Board allow flexibility?

We are supportive of the comments provided by NJSEC

- d. Please comment on the potential for allowing distributed storage developers to place offers that aggregate a pool of distributed resources into a single “virtual power plant” bid that can participate in the grid supply paired with an energy storage tranche. Please address whether this is technically feasible for implementation in the first round of auctions or whether it should be deferred for possible consideration in future development cycles.

We are supportive of the comments provided by NJSEC

New Programs and Technologies

- 17. For solar projects proposed on farmland that allow for continued farming on the same parcel, known as “agrivoltaics” or “dual-use programs,” is it likely that there is a market for dual-use projects smaller than 2 MW, or should Staff presume that all dual-use projects would be larger and enter the competitive solicitation?

We are supportive of the comments provided by NJSEC

18. If dual-use projects are permitted into the competitive solicitation in future years, should they be permitted as a fifth tranche or into the basic grid supply tranche with an adder? If with an adder, how should the Board determine the adder?

We are supportive of the comments provided by NJSEC

19. Should additional siting restrictions be established for dual-use projects, for example, by limiting dual-use projects only to farms that meet certain soil characteristics or that are used for a certain type of herding, grazing, or crop type?

We have no comment at this time.

20. What rules and regulations should be established to ensure either no loss, or a reasonable loss, of agricultural productivity for dual-use projects? What should be considered a “reasonable loss” of agricultural productivity?

We have no comment at this time.

21. Are there additional solar technologies or use cases for which this Successor Straw has not yet considered that may be considered for the Successor Program, either now or in the future? Please explain.

We continue to reiterate the need for an energy storage incentive or support mechanism to spur the growth of energy storage in New Jersey.

Solar Siting

22. Please comment on Staff’s proposed methodology for (a) limiting solar development on the areas specified on page 20 and (b) establishing a path forward for projects seeking to be developed on desired land uses that fall within otherwise prohibited siting areas.

We are supportive of the comments provided by NJSEC and further add that there are simply not enough parcels to develop to achieve the RPS goals under this siting criteria. We have performed a GIS based analysis to align parcel screening with the straw proposal for the development of larger 10MW+ grid tied projects. The site requirements removed all parcels that were forested, encumbered by wetlands or flood hazard areas or other ecological barriers, open space, pinelands, highlands, preserved

farmland, in a County ADA, and 20 or more acres so they could support a grid ties project. The analysis yielded only 280 parcels, of which only 5 are reasonable to develop – the non-developable areas included sites like schools, cemeteries, shopping centers, unclosed landfills, seaports, etc. Removing the agricultural development exception would better align with the State’s RPS goals while also protecting all preserved farmland.

Additionally, we recommend that the BPU allow the administration of Pinelands lands and Highlands lands be left to those agencies. Both of which have their own management plans that identify how solar may be permitted in their territory. If a project is compliant and permissible under their standards, it should be permitted to participate in state incentives.

23. Has Staff overlooked any siting categories for which solar development should be either expressly prohibited or otherwise limited as described in the Successor Straw and noted in the question above?

We have no comment at this time.

24. Has Staff overlooked any siting categories for which solar development should be considered a desired land use?

We are supportive of the comments provided by NJSEC

25. How should Staff consider relatively new land uses for solar development, such as floating solar, former mines, and quarries? Others?

We are supportive of the comments provided by NJSEC

26. Please comment on a proposed methodology for qualifying “contaminated lands.” Please cite objective federal or state standards.

We have no comment at this time.

Section IV: Megawatt Targets

27. Should the annual capacity targets for the administratively set program be set broadly for the whole program, or should the administratively set program be further subdivided into market segments with individual cost caps? In other words, should the

Board set cost caps for the residential sector, net metered commercial rooftop, net metered commercial ground-mount, etc., or simply allocate a certain amount of money to the whole net metered program? Staff notes that the community solar segment will have its own cost cap.

[We are supportive of the comments provided by NJSEC](#)

28. Should the annual capacity targets for the competitive solicitation tranches be set with flexible parameters, such that the Board may accept more or fewer projects into any particular tranche based on viable project applications and pricing, as long as the total projects accepted into the competitive solicitation don't exceed the overall annual budget cap?

[We are supportive of the comments provided by NJSEC](#)

29. Please comment on Staff's proposed megawatt targets for the first year (EY 2022) (see page 22).

[We are supportive of the comments provided by NJSEC](#)

Section V: Cost Cap Calculation

30. Staff proposes to include the total amount of expenditures by electricity customers on annual retail bills and the costs associated with all net metered and other solar projects – whether host-owned or third-party owned – when calculating the denominator of the cost cap, as to accurately reflect the total amount of money paid by New Jersey customers for electricity (see details beginning on page 24 for details).

- a. Do you agree with Staff's proposed categories for inclusion? Should any category be omitted? Has Staff overlooked a category that should be included?

[We are supportive of the comments provided by NJSEC](#)

- b. Please comment on the sources of information, calculations, and assumptions underlying the categories.

[We are supportive of the comments provided by NJSEC](#)

31. Please consider the benefits and consequences of using the moving three-year average of annual electricity demand versus annual amount.

We are supportive of the comments provided by NJSEC

32. For the purposes of forecasting future electric costs to estimate the cost cap in later years, Staff proposes using a 0.5% growth factor based on consumption patterns, presumptive expenditures for future and continued clean energy incentives, such as energy efficiency programs, ORECs, and ZECs, as well as increased demand due to vehicle electrification in particular, and cost declines due to increasing energy efficiency. Please comment on Staff's assumptions.

We are supportive of the comments provided by NJSEC

33. Staff proposes to include the following elements in calculating the numerator of the cost cap to reflect the cost of incentives paid by ratepayers: the annual costs of SRECs, TRECs, and Class I RECs, minus the DRIPE benefits of solar (see section beginning on page 29 for details).

- c. Do you agree with Staff's proposed categories for inclusion? Should any category be omitted? Has Staff overlooked a category that should be included?

We are supportive of the comments provided by NJSEC

- d. Please comment on the calculations and assumptions underlying each of the components of the cost cap.

We are supportive of the comments provided by NJSEC

- e. How should the Board consider the assumed annual value of SRECs, which is not fixed?

We are supportive of the comments provided by NJSEC

Section VI: Implementing the Successor Program and Transitioning from the Transition Incentive Program

34. Please comment on the Staff proposal that, following the close of this stakeholder process, the Board will issue an Order directing Staff to close the Transition Incentive Program within 30 days. After that 30-day period, the administratively set program will open immediately. The competitive solicitation is targeted to commence in the second half of 2021. Staff notes that there will be a seamless transition for residential, community solar, and net metered projects at 2 MW or less, but there will likely be a gap between the end of the TI Program and the start of the competitive solicitation that will affect large net metered and grid supply projects.

We are supportive of the comments provided by NJSEC, except in that the new “Subsection (t)” projects should be administratively set incentives.

Ensuring State Policy Priorities

35. Should “adders” or “subtractors” be used to further differentiate incentives by project attributes in both the administratively set incentive program and the competitive solicitation, only one program, or neither? Explain why.

We support an adder for projects that include energy storage.

36. Would adders make the administratively set incentive program too complex when coupled with the anticipated differentiation envisioned for residential, non-residential roof, non-residential ground, community solar LMI, and community solar non-LMI? How could they be used most effectively?

We support an adder for projects that include energy storage. The Massachusetts SMART program included an energy storage adder and that is having the desired result – a significant deployment of new energy storage projects. We believe the NJBPU can establish a similar robust build out of energy storage in New Jersey as part of the successor program.

37. Should the administratively set incentive program include an adder for projects that benefit environmental justice communities? For the competitive solicitation? If so, should there be criteria to select the projects with the highest benefits? How can “benefits” for these communities be quantified?

We are supportive of the comments provided by NJSEC

38. How else could the Board consider designing the program to encourage broader participation among traditionally underrepresented groups?

We have no further comments at this time.

Section VII: Community Solar Permanent Program

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).

We are supportive of the comments provided by NJSEC

40. Please comment on the Pilot Program rules (detailed beginning on page 41) and discuss which, if any, the Board should consider modifying for the Permanent Program, and why.

We are supportive of the comments provided by NJSEC

41. Currently, community solar projects must be sited in a single location and are not permitted to include aggregated rooftops.

- f. Should the Board consider revising this policy to allow aggregation of rooftop projects, up to the 5 MW capacity limit? Please comment on this general policy, and if you agree, what kind of limitations should the Board set with respect to the proximity of the rooftops, site control or ownership, etc.

We are supportive of the comments provided by NJSEC

- g. What should the Board consider with respect to the competing value of rooftop space, particularly on multi-unit residential and small commercial buildings, in locating HVAC or other equipment necessary for future energy efficiency and building decarbonization measures?

We have no comments at this time

Bonus Question

42. Staff is seeking feedback on its proposal to call the Successor Renewable Energy Certificate a “UREC” to differentiate it from the Solar Renewable Energy Certificate (SREC) and the Transition Renewable Energy Certificate (TREC). In the alternative, please provide additional acronyms or program names for consideration

We have no comments at this time