



Aida Camacho-Welch
Secretary
New Jersey Board of Public Utilities
Post Office Box 350
Trenton, New Jersey, 08625

RE: Successor Program Capstone Report Docket No. OO20020184

Dear Ms. Camacho-Welch,

ECA Solar is pleased to submit comments regarding the above-referenced Successor Program Capstone Report Docket No. QO20020184. ECA Solar, a leading solar developer and installer in the Northeast and mid-Atlantic, that specializes in large commercial rooftops, brownfields, and parking canopies. We are proud to be a contributor to the growth of the New Jersey solar market.

We are writing to encourage the Board of Public Utilities to consider certain policy changes for the Solar Successor Program. In particular, to embrace the Successor Plan Design Criteria “with an emphasis on community solar, rooftop and landfill resources, while minimizing use of productive agricultural and or forested lands.”

It is possible that the Capstone Report underestimates the potential for solar rooftops in New Jersey. For instance, getting to the 12.2 GW target of solar by 2030 as outlined in the Integrated Energy Plan could be done exclusively thru New Jersey rooftops. Previous testimony to the Board of Public Utilities has compared Saudi Arabia and their oil reserves, to New Jersey and the vast amount of roof space. Some of the largest roofing companies in the world are headquartered in New Jersey.

Under the current regulations and rules, a large majority of commercial rooftops in NJ are simply being unused and will remain that way under the current policy regime. The question is why? For one, the majority of the commercial buildings in New Jersey do not have a significant on-site load and the current regime essentially requires behind the meter solar. Second, the average ground mounted system will produce much more energy than a rooftop because a ground mounts are typically directed due south, up to 25-30 degrees tilted south, and often include tracker racking systems that follow the sun. Whereas roof mounted and carport arrays, are always fixed tilt and up to 10 degrees tilted south. As a result, of this “production gap,” the ground mounted arrays always dominate programs and the communities are forced to deal with the aftermath. We would



encourage the authors of the Capstone report to offer charts on the cost per kwh of output; instead of cost per watt, which is less valuable for modelling.

Under the current incentive regime. The Commonwealth of Massachusetts now has over 80-85% of the megawatts mounted on the ground; the majority of those are on greenfields. This fact has caused significant land-use controversy and backlash from rural communities that have been overrun with ground mounted arrays. Without the appropriate caps the ground mounted solar will inevitably dominate the State's landscape given they are cheaper to build and dominate the production gap. This is not the highest best use of these lands, whether it be farming, residential commercial or industrial. In addition, solar is not a useful land use for job creation.

We have the following recommendations to unleash the power accessory-use projects, including rooftop, in New Jersey while preserving open lands for conservation and higher uses.

- Establish a fixed incentive instead of a tradeable REC. Given the policy options listed on page nine (9) of the Capstone Report, we would recommend either the "Fixed Incentive" or "Feed in tariff", either could provide the fixed nature.
- Establish a long-term incentive with twenty (20) year duration; even if the incentive is less.
- Provide a dedicated carve-out for commercial rooftop solar, ideally with categories up to 500kw AC and up to 5 Megawatts AC. We would recommend that this for at least thirty percent (30%) of the Successor Program. This carve out is less important for the residential sector since the vast majority are already roof mounted.
- Establish a meaningful rooftop adder, at least \$0.045 cents/kwh or more depending on size. Rooftop is one of New Jersey's largest untapped resources. This should be one of the highest adders, not the lowest.
- Eliminate any requirements for behind the meter systems and enhance the size of the Community Solar program. Most of the large commercial buildings and distribution centers have no significant energy usage on site, there is a need for a program that allows export-only arrays. These large buildings are in effect blocked from participating in the current program and wasting their vast space. "Standalone" roof mounted systems that are in front of the meter should be encourage with a carve-out and adder.
- Differentiating between Direct Owned ("DO") and Third Party Owned ("TPO") is largely irrelevant; this also has no bearing on the Renewable Portfolio Standard.



The implementation of the above policies within the Successor Program will have long lasting positive effects on the growth of the solar industry in New Jersey. They will also benefit the rate payer as NJ grows a stronger, more locally filled grid.

ECA solar thanks the Board for this opportunity and applauds its efforts in creating the Successor Program.

Kind Regards,

Todd Fryatt
President

ECA SOLAR LLC