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VIA EMAIL AND E-FILING

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**Re: I/M/O COMPETITIVE SOLAR INCENTIVE ("CSI") PROGRAM
PURSUANT TO P.L. 2021, C.169 (BPU Docket No. QO21101186)**

Enel North America, Inc. (“Enel”) submits these comments regarding the design of the Competitive Solar Incentive (“CSI”) Program in response to the Board of Public Utilities (“BPU”) Stakeholder Notice dated November 1, 2021. Enel appreciates the BPU and Staff’s continued engagement on these critical questions. More broadly, we’re grateful for the BPU’s focus on ensuring that New Jersey can accomplish its clean energy objectives in a reliable, cost-effective manner. As one of the world’s largest utilities and global developer and operator of renewable capacity, we enthusiastically support state policies for rapid decarbonization and clean energy deployment.

Enel Green Power North America is a leading owner and operator of renewable energy plants with a presence in 14 US states and one Canadian province. The company operates 58 plants with a managed capacity of over 6.6 GW powered by wind, geothermal and solar energy. Enel X in North America has around 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW of demand response capacity and over 70 battery storage projects that are operational and under

contract. Enel X is revolutionizing the EV charging market with its smart charging solutions deploying over 70,000 charging stations in the US.

Enel has ambitious development plans throughout the PJM region and is eager to expand its clean energy leadership in New Jersey. Enel has been partnering with commercial & industrial customers in NJ for nearly 15 years, helping them monetize their flexibility in the PJM demand response program. Enel also provides electric vehicle supply equipment to customers in New Jersey and is actively developing clean energy projects across the state.

Unless otherwise demonstrated in the comments below, Enel supports the joint comments submitted to this proceeding from The Solar Energy Industries Association (SEIA), New Jersey Solar Energy Coalition (NJSEC), and Mid-Atlantic Renewable Energy Coalition Action (MAREC Action). Please refer to these comments for specific issues and recommendations for how to develop a Solar Successor Program that works not just for developers but for ratepayers as well.

BPU Stakeholder Notice Question 4

Staff aims to propose a solicitation design that results not only in awards, but in successful project development. To facilitate this, some combination of project pre-qualification requirements, COD requirements, participations fees, and/or escrow requirements are being considered:

- a) Should Staff consider recommending a requirement that projects have completed a Facilities Study? What about having a requirement for a completed or draft System Impact Study? Are there other PJM queue position requirements that should be considered? At what point in the process would an SREC-II award provide the most value in terms of preventing projects dropping out of the queue? What would the impact of other project maturity evidence requirements be (e.g., site control, evidence of ROW control, evidence of community engagement)?**

Enel agrees with Board Staff that there should be pre-qualification requirements related to project maturity that must be met by a solar developer in order to be eligible to bid into the competitive solicitation. Given the desire to ensure more projects are able to reach commercial

operation if they are offered a REC contract, and to avoid speculative bids for projects that will send inaccurate price signals, each project that is being bid into the competitive solicitation should already have a completed System Impact Study and Facility Study. This would provide the greatest assurance to the BPU that a project will be able to reach COD within the two-year timeframe following the solicitation award since much of the timing uncertainty regarding the PJM interconnection process will have already been addressed. In PJM, the Interconnection Agreement immediately follows the completion of the Facility Study, but the project's energization date is driven by the transmission owner's ("TO") timeline for building the interconnection facilities and network upgrades. This last construction step can take a substantial amount of time. On average, there is a 12-to-36-month timeframe between the completion of the Facility Study and the project's energization date. More importantly, a project owner should know the timeline once a project has a completed Facility Study and therefore can decide whether to submit a bid that requires an in-service date within 24 months from award. However, the BPU should still consider requests for timeline extensions if there are delays that are outside the control of the project owner.

In addition, each project should be required to demonstrate site control, right of way ("ROW") control, and some evidence of community engagement prior to bidding into the competitive solicitation.

- b) NYSERDA requires bid participation fees ranging from \$5,000 to \$100,000 depending on the size of the project. What is the right level for a 5 MW project versus a 20 MW project?**

The CSI Program should include high maturity requirements that strike a balance between reducing speculative bids from developers and recognizing that competitive solicitations

are inherently riskier to developers since not all projects will be awarded incentives. Setting a significant and constant fee will allow the BPU to strike this balance.

Conclusion

We appreciate the BPU's careful consideration of the program design and openness to input from industry stakeholders who bring decades of experience developing renewable energy projects across the country. Enel is ready to invest in helping New Jersey meet its clean energy goals and looks forward to collaborating with the BPU to craft a successful program.

Collectively, these recommendations will help ensure that New Jersey maintains its place as a national leader in solar and achieves the state's aggressive clean energy goals. Thank you for considering these recommendations.

Respectfully,

/s/ Adam Stern

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