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Secretary Aida Camacho-Welch,

Sunnova Energy International Inc. (NYSE: NOVA) is a leading residential solar and energy storage service provider, with customers across the U.S. and its territories, including New Jersey. The purpose of this letter is to provide recommendations on the current effort to modernize the New Jersey grid. These recommendations come from a list of best practices to speed up interconnection timelines that help with transparency, efficiency, and are cost effective.

The first recommendation is to fix PSE&G Interconnection Application to allow for electronic signatures. Everything on the application can be filled out electronically in the pdf form except for the signature. This small step can delay application submission for households that do not own a printer. IREC[1] recommends that all forms should be able to be filled out electronically including electronic signatures. PSE&G is adding an unnecessary roadblock to the submission of interconnection applications.

The next recommendation is to allow for electronic submission of payment for interconnection applications. Currently, PJM is requiring preapplication forms to be paid for with a printed and mailed check. This utility has the capability to allow online payment for everything else a customer does, so there is no justification for the requirement of a physical check. Again, this seems unnecessarily inefficient, and just a roadblock for a smooth interconnection process.

Additionally, customers should have access to an active checklist that lets them know what steps they have completed and which ones they haven't or need to redo in order to fix some error. This can reduce efforts needed in customer support and time emailing back and forth. Customers should have access to all information needed for their interconnection path in one convenient place.

Furthermore, there needs to be a better method of enforcing interconnection timelines for utilities. It seems the only enforcement for interconnection timelines is a complaint form that customers can fill out. While this is may seem like a promising first step, it cannot be the only enforcement method. This single enforcement mechanism can lead to retaliation by the utilities and slowing down specific projects from customers and installers that have submitted complaints. Utilities need to be transparent about their past and current interconnection timelines with relevant totals and make this available for third-party review.

To continue to help meet the renewable energy goal set out by the state, New Jersey should continue to have no interconnection fees for level one generators. Interconnection fees make home solar less economically viable for energy customers. By not having level one fees, New Jersey is also helping with energy justice issues for low- and middle-income families that find home solar energy systems to be unattainable without assistance.

1. Interstate Renewable Energy Council, Inc., *Model Interconnection Procedures* (2019), https://irecusa.org/publications/irec-model-interconnection-procedures-2019.

Regarding feeder upgrades, utilities will receive a rate of return on investments they make, so the burden of feeder upgrades should not be put on residential solar customers. Feeder upgrades will make or break a customer's decision to invest in renewable energy because they are not promised a rate of return on their investment. Such financial burdens on distributed generation will slow down New Jersey's ability to reach its energy master plan goal of 100% clean energy by 2050.

NJ BPU should also consider the addition of automatic solar energy permitting from SolarAPP+. With the expected increase of solar installations, manual permitting approval will bottleneck solar energy adoption. A recent study published in Energy Policy[2] found that half of installers avoid AHJs with difficult permitting processes or will charge a premium to customers that live in those AHJs. SolarAPP+ has the capability of providing instant permitting approval, which saves the state resources that could be used on other modernization processes. SolarAPP+ is a free permitting tool funded by the DOE and created by NREL, which can help alleviate interconnection costs.

The last recommendation is to have New Jersey utilities share common issues customers face during their interconnection process. This should be shared with customers and parties possibly interested in pursuing interconnection. This information could be on the website or shared over email in on a quarterly or semiannual basis. This increases transparency while potentially saving money and time customer service spends with customers.

Sunnova Energy International appreciates the time and effort New Jersey BPU is putting into modernizing the current grid. We are excited to work with many different stakeholders and find customer focused solutions that will also enable New Jersey to reach its clean energy goals.

2. Cook, J. J., Cruces, J., O'Shaughnessy, E., Ardani, K., & Margolis, R. (2021). Exploring the link between project delays and cancelation rates in the U.S. rooftop solar industry. *Energy Policy, 156,* 112421. http://doi.org/10.1016/j.enpol.2021.112421