

**REQUEST FOR COMMENTS IN THE MATTER OF
THE COMMUNITY SOLAR ENERGY PROGRAM**
[Docket No. QO22030153](#)

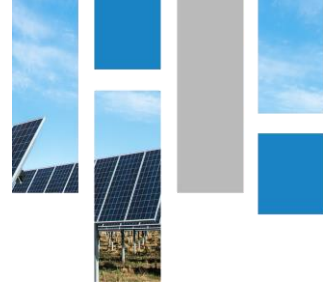
Dimension Renewable Energy (“Dimension”) thanks the New Jersey Board of Public Utilities (“BPU” or “the Board”) and staff for the opportunity to submit these comments regarding the design of the permanent Community Solar Energy Program (“Permanent Program” or “the Program”). In these comments, Dimension responds to question #7 on how projects should be selected for participation in the Permanent Program and suggests that the Pilot Year 2 solicitation scorecard be used one more time and only for the first year of the Permanent Program before transitioning to a first-come, first-served model.

Dimension is actively developing community solar projects which we were awarded in the second year of the Community Solar Pilot Program (“Pilot Program”). We are also participating in the BPU’s grid modernization efforts, and actively involved in the design of New Jersey’s Permanent Program. In addition to our work in New Jersey, Dimension is participating in the development of several others state community solar programs, including Virginia, Maine, New Mexico, California, Wisconsin, Ohio, and Pennsylvania. Our comments are informed by our actual experience in New Jersey and other states. Dimension is an active member of the Coalition for Community Solar Access (“CCSA”). We strongly support the long-term vision CCSA has developed through briefing papers on this topic and CCSA’s response to this request for comments.

The Permanent Program will be burdened by the success of the Pilot Program. In addition to creating meaningful savings and community development benefits, the Board’s thoughtful design attracted hundreds of projects to serve low- and moderate income (“LMI”) families. Only 106 of the 412 project applications were accepted into the second year of the Pilot Program, leaving as many as 300 projects waiting for an opportunity to participate the Permanent Program. Over the 15 months since the 412 aspiring projects submitted their applications, many more new projects have secured sites and are poised to participate. This overhang of projects validates the BPU’s Pilot Program design and indicates that tens of thousands of New Jersey LMI families stand to benefit from the Permanent Program. However, the project overhang clearly signals that the Permanent Program selection process will be stress tested the moment the Program opens.

Dimension supports CCSA’s vision for a permanent program based on an open tariff that allows well-developed, mature projects to post development security and apply for Permanent Program capacity on a first-come, first-served basis. This approach, combined with a requirement for interconnection studies and meaningful development security on deposit, will ensure that projects are de-risked and will bring their promised benefits to LMI families promptly—without putting an unwieldy administrative burden on the Board and Board staff.

Dimension respectfully notes that it is approaching two years since the last Pilot Program solicitation was issued in the Fall of 2020. The projects chosen through that process will soon begin serving New Jersey’s LMI families, but there will be a long hiatus before the next block of projects will be chosen and the next wave of LMI families served. Adding to the delay is the time required for the Board and electric distribution companies (“EDCs”) to identify and implement the changes needed in EDC interconnection procedures to manage the wave of project developers waiting since February of 2021.



Rather than delay the Permanent Program and the benefits it will bring to LMI families, Dimension suggests that the BPU simply repeat the successful solicitation that was initiated in the Fall of 2020, with one important change. To reduce the administrative burden on BPU staff and to avoid delays in processing applications, applicants should be charged a fee of \$1,000 per MW of project capacity and the fees used to pay for a third-party administrator to review and score the applications on behalf of the BPU.

As described in CCSA's thoughtful comments, solicitations won't be necessary or desirable once the EDCs and the BPU have reformed the interconnection application process. However, program delay in the interim is a disservice to the thousands of New Jersey families who could be subscribers on community solar projects chosen in 2022 and brought to commercial operation as early as 2023.

One more solicitation in 2022, using the scorecard already developed by BPU staff and approved by the Board, will ensure the Board's policy goals for the Program are met and benefits flow to New Jersey's LMI families sooner, rather than later. Requiring applicants to pay for a third-party administrator through a modest fee will reduce the work and administrative burden borne by BPU's staff and ensure that projects are selected quickly so that LMI families can benefit from energy savings and economic development in their communities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J Henri".

Joseph Henri
Senior Vice President of Policy
Dimension Renewable Energy