



NJBPU  
Docket No. QO22030153  
Request For Comments  
Attn: Carmen Diaz, Acting Secretary of the Board

### **Comments from Tattleaux Solar Group, LLC**

#### ***Overview Comment:***

On November 2019, the NJ BPU provided conditional approvals to 45 MW of community solar projects totaling 77 MW. As of March 31, 2022, almost 2 ½ years later, only 14 projects have been installed totaling only 29 MW. Tattleaux believes a primary contributor to this underperformance of the BPU's goals for community solar: capacity and equity is the design of the program as implemented by its specific rules.

#### **Tattleaux Solar Group Comments to each numbered Request for Comments**

- 1) The SRECs for planned projects that do not reach commercial completion after the BPU-specified grace period should be withdrawn from the projects and added to the next period's community solar program. We have seen many projects provided conditional approvals 1) were not budgeted in a sufficiently rigorous manner and 2) did not plan properly for acquisition of LMI subscribers
- 2) Capacity should be divided by municipal areas with more capacity provided to areas of low-to-moderate income (as determined by area median income)
- 3) Agree with Pilot Program
- 4) Restrictions and limitations to community solar project siting should be kept at a minimum and any of these should be eliminated by projects that demonstrate strong needs by the area's consumer demographics (i.e., LMIs)
- 5) Interconnection standards and processes for community solar projects should be relaxed and streamlined for projects that 1) demonstrate access to larger pools of LMIs and 2) are smaller, i.e., 2 MW-dc or smaller
- 6) Provide quicker interconnection approvals to community solar projects that 1) demonstrate access to larger pools of LMIs and 2) are smaller, i.e., 2 MW-dc or smaller. This is to prevent the much larger projects, esp. those subject to the Competitive Solar Incentive program, from delaying the interconnection approval and therefore construction of smaller community solar projects because these do not constrain grid capacity at the project's nearest substation.
- 7) Tattleaux has made numerous suggestions to the BPU in response to this Request for Comment. Essentially, projects should be selected for participation based primarily on: a) proven access to LMI subscriber pools, 2) true, strong partnerships with a community organization or municipality (mere letters of support should not suffice) and 3) demonstrated cooperation and support from the local township or city

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## TATTLEAUX NEW JERSEY SOLAR

- 8) We support a waitlist only if the BPU demonstrates a willingness to withdraw conditional approval for SRECs for projects that do not reach completion by a reasonable time period. The number of projects placed on such a waitlist should be limited and include only those that meet selection criteria we propose in 7) above
- 9) We agree with the Pilot Program's maturity requirements
- 10) No comments
- 11) We believe the Board has done enough to ensure LMI participation excepting only that the Board's community program needs to select projects that demonstrate the ability to reach LMI communities and families. We believe firmly Pilot Program Years 1 and 2 accepted a large number of projects that do not demonstrate, nor will be able to ensure, LMI participation.
- 12) We agree mostly with the Pilot Program's income verification rules, especially with the developer's ability to submit for approval on a case-by-case basis verification forms and info that justifies acceptance
- 13) In our work, we find that this is subjective and dependent on a case by case basis
- 14) In our work, we find that project sites are offered to us that need a wider area of pools of subscribers because our community partner's membership is more dispersed in the county, beyond the municipality and adjacent municipalities of the project. This should be taken into consideration.
- 15) LMI families often have lower electricity needs so we recommend the 250 subscriber maximum per MW be increased to 300
- 16) No comment
- 17) We are opposed to this "opt-out" provision because 1) the consumer is not sufficiently educated and informed to accept the subscription or make an opt-out decision. Enrollment should be wholly the responsibility of the project developer who has received the significant financial benefits provided by the SRECs
- 18) No comment
- 19) No comment
- 20) No comment
- 21) More later