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The logo for PSEG Services Corporation, featuring a stylized sun icon to the left of the text "PSEG" in a bold, sans-serif font, with "Services Corporation" in a smaller, italicized font below it.

May 31, 2022

**In the Matter of Competitive Solar Incentive (“CSI”) Program
Pursuant to P.L. 2021, C.169
BPU Docket No. QO21101186**

Via Electronic Mail

Acting Secretary of the Board
Board of Public Utilities
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 08625-0350
board.secretary@bpu.gov

Dear Acting Secretary Diaz:

Consistent with the Board’s March 16, 2022 Notice and updated on April 20, 2022, in the above-captioned docket, Public Service Electric and Gas Company respectfully submits the following attached comments on the implementation of Section 6 of the Solar Act of 2021.

Very truly yours,

A handwritten signature in black ink that reads "Aaron I. Karp".

Aaron I. Karp

Attachment

I/M/O Competitive Solar Incentive (“CSI”) Program Pursuant to P.L. 2021, C.169 Docket No. QO21101186

Public Service Electric and Gas Company Comments on the Design and Establishment of Siting Rules Applicable to All Projects Eligible to Participate in the CSI Program

Public Service Electric and Gas Company (“PSE&G”) appreciates the opportunity to provide input in Board Staff’s stakeholder process regarding Section 6 of the Solar Act of 2021 (L. 2021, c. 169, or “Act”) governing the design and establishment of siting rules applicable to all projects eligible to participate in the Competitive Solar Incentive (“CSI”) Program portion of the Successor Solar Incentive (“SuSI”) Program.

PSEG strongly supports the policy objectives of the State of New Jersey and Governor Murphy to significantly reduce greenhouse gas emissions, with the goal of 50% renewable energy by 2030 and 100% clean energy by 2050. These policy objectives are necessary to address climate change, perhaps the most significant long-term threat to the State of New Jersey. We commend the Board for soliciting stakeholder input on all components of the SuSI Program and putting the solar market on a path to a Successor Program that cost effectively achieves the State’s clean energy goals.

PSE&G has significant experience in siting solar projects as part of its Solar 4 All® Program, which has developed 158 MW of solar generation since 2010. PSE&G’s Solar 4 All® Program targets landfills and contaminated sites (such as brownfields) for development: sites that are generally difficult to develop for the private market due to the complexity and challenges of meeting New Jersey Department of Environmental Protection requirements, local permitting and a long development cycle (approximately 2-3 years). Through the Solar 4 All® program, PSE&G has become a national leader in developing these difficult sites, with approximately 40% of all landfill/contaminated site solar capacity in the State. This model can and should be expanded to allow utilities to build and own solar on additional unproductive landfill and contaminated sites. PSEG supports the Board’s goal to protect New Jersey’s open and agricultural space, as discussed in the Siting Stakeholder Meetings. Those goals can be aligned with the CSI Program’s goals by expanding solar development on lands other than open or agricultural space, including by establishing a target for utility ownership and operation of sites located instead on landfills and contaminated sites, as PSE&G’s Solar 4 All® Program has done.

Thank you again for this opportunity to provide comments on the siting rules for projects eligible to participate in the CSI Program. We look forward to working with the Board, Rate Counsel and interested stakeholders to continue to develop a Successor Solar Incentive Program that achieves the important goals set forth in the Clean Energy Act of 2018.