

BLUEWAVE

June 20, 2022

Carmen D. Diaz
Acting Secretary of the Board
44 South Clinton Ave., 1st Floor
Trenton, NJ 08625-0350

RE: DOCKET NO. QO21101186 - IN THE MATTER OF COMPETITIVE SOLAR INCENTIVE ("CSI") PROGRAM

Dear Acting Secretary Diaz,

Thank you for the opportunity to submit comments on this matter today. BlueWave appreciates the hard work of the Board of Public Utilities (the Board), Daymark, and staff in putting together the CSI straw proposal and holding multiple stakeholder meetings to solicit feedback. We offer the following comments with particular emphasis on the overlap between the CSI program and the dual-use pilot program, which we understand will be fully fleshed out in a future proceeding. We look forward to continued collaboration towards New Jersey's ambitious goals for clean energy deployment.

BlueWave's vision is to protect our planet by transforming access to renewable energy. As a pioneering solar developer based in Boston, Massachusetts, BlueWave has developed and built more than 150 MW of solar projects to date. As built, these projects collectively generate enough solar energy to avoid more than 144,000 metric tons of carbon emissions annually. A certified B Corp, BlueWave has received national recognition for its work to protect the planet, and continues to innovate through community solar, energy storage, agrivoltaics, and floating solar technologies.

BlueWave submits these comments with the goal of elucidating more specifics about how dual-use projects will be incorporated into the CSI program. It is our current understanding that dual-use projects seeking compensation must first qualify through the dual-use pilot program. Qualified projects will receive an incentive through the pilot program in order to cover the marginal costs of dual-use. As outlined in the CSI straw proposal, it appears that qualified dual-use projects can then choose to pursue a base incentive through the CSI program in whichever tranche they qualify. We respectfully ask that this order of operations be clearly spelled out in the final CSI program rules to provide certainty for interested bidders.

In addition, BlueWave maintains its recommendation that dual-use projects be allowed the flexibility to pursue a base incentive through either the CSI program or the Administratively

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Determined Incentive (ADI) program, depending on their size.¹ As we have detailed in previous comments, New Jersey's farmers, ratepayers, and communities stand to benefit from innovative dual-use projects that serve community solar and low-income off-takers. We look forward to the future proceeding in which the dual-use program will be fully fleshed out, but anticipate that the order of operations we have detailed above will provide clarity to developers while minimizing administrative complexity for the Board and staff.

As part of the process for qualifying a dual-use project through the pilot program, we expect that projects will be subject to stringent siting and construction guidelines. Robust land use guidelines will ensure the success of the dual-use pilot program by preserving farmland soils and enhancing agricultural operations. Due to this separate and specific set of standards, BlueWave recommends including clear language in the CSI program rules that dual-use projects meeting siting standards through the dual-use pilot program are not secondly subject to the CSI siting guidelines outlined by staff in the solar siting straw proposal.

It is in all of our best interests to treat New Jersey's best soils with the care and protection they require. Unfortunately, the Solar Act of 2021 allows 2.5% of prime agricultural soils and soils of statewide importance to be used for traditional ground-mounted solar.² In the dual-use pilot program, projects are prohibited from being built on these same soils which stand to benefit from regenerative practices introduced through each project. As staff have recognized, standard, ground-mounted projects will have a much greater impact on farmland across the state than those qualified through the dual-use pilot program.

BlueWave proposes two measures in order to mitigate impacts to prime agricultural soils and soils of statewide importance from standard, ground-mounted projects participating in the CSI program. Firstly, the Board should make every effort to allow grazing, pollinator planting, and other regenerative practices on as many CSI projects as possible, especially those that are sited on prime agricultural soils and soils of statewide importance. Incorporating these low-cost solutions into standard solar projects can minimize impacts to New Jersey's best soils and increase the likelihood that more sites can be brought back into agricultural production in the future.

Secondly, BlueWave recommends that the Board allow dual-use projects to be built on prime agricultural soils and soils of statewide importance as part of the dual-use permanent program. The dual-use program's enabling legislation allows the Board to establish different siting guidance as part of the transition to a permanent program, while still ensuring that New Jersey's

¹ While dual-use projects can be sized up to 10 MW, projects in the ADI program and community solar permanent program are capped at 5 MW. Our recommendation is that dual-use projects opting to receive their base incentive from the ADI or community solar programs adhere to each program's respective size limitations.

² [Solar Act of 2021](#), C.48:3-119 *Siting criteria required to commence operation*.

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best soils are protected.³ We hope the Board uses this opportunity to encourage more dual-use projects on prime agricultural soils and soils of statewide importance while conversely limiting the amount of these lands available for standard solar development.

Thank you for the opportunity to submit feedback today and for your continued commitment to stakeholder engagement and transparency. BlueWave looks forward to working with you to ensure that New Jersey's clean energy programs remain a nation-leading success. Please do not hesitate to reach out with any questions.

Sincerely,

Kaitlin Hollinger
Policy Manager
BlueWave

³ [Chapter 170](#). C.48:3-87.13 Rules, regulations for "Dual-Use Solar Energy Pilot Program."