



**June 20, 2022**

**VIA EMAIL AND E-FILING**

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**Re: COMPETITIVE SOLAR INCENTIVE (“CSI”) PROGRAM (BPU Docket No. QO21101186)**

Enel North America, Inc. (“Enel”) submits these comments regarding the design of the New Jersey Competitive Solar Incentive Program Straw Proposal (“CSI Program Straw Proposal”) in response to the Board of Public Utilities (“BPU”) Stakeholder Notice dated April 26, 2022 (“Notice”). Enel appreciates the BPU’s continued engagement on these critical questions. More broadly, we are grateful for the BPU’s focus on ensuring that New Jersey can accomplish its clean energy objectives in a reliable, cost-effective manner. As one of the world’s largest utilities and global developer and operator of renewable capacity, we enthusiastically support state policies for rapid decarbonization and clean energy deployment.

**Introduction**

Enel Green Power North America is a leading owner and operator of renewable energy plants with a presence in 14 US states and one Canadian province. The company operates 64 plants with a managed capacity of over 8 GW powered by wind, geothermal and solar energy. Enel X in North America has around 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW

of demand response capacity and over 70 battery storage projects that are operational and under contract. Enel X Way is revolutionizing the EV charging market with its smart charging solutions deploying over 110,000 charging stations in the US.

Enel has ambitious development plans throughout the PJM region and is eager to expand its clean energy leadership in New Jersey through a robust utility-scale solar and energy storage development pipeline. Throughout New Jersey, Enel has over 400 MW of utility-scale solar plus energy storage projects in advanced stages of development and over 100 MW of utility-scale solar plus energy storage projects in early stages of development. As a leading developer, we appreciate the hard work and careful consideration by the BPU Staff in putting this straw proposal together.

Unless otherwise demonstrated in the comments below, Enel supports the joint comments submitted in response to the BPU's April 26<sup>th</sup>, 2022, notice from the "Joint Solar and Storage Parties".<sup>1</sup> The BPU should refer to these comments for specific issues and recommendations for how to develop a Solar Successor Program that works not just for developers but for ratepayers as well.

## **Enel Responses to BPU Questions for Stakeholder Feedback**

### **Question 6: Please comment on the proposed structure of the storage bid and incentive.**

Enel appreciates Staff's recognition of the value energy storage brings to utility-scale solar projects and fully supports the inclusion and proposed design of the storage incentive in the Straw Proposal. Solar plus storage resources can increase reliability and market competition, decrease system costs, and enable a transition to a cleaner, more resilient electric grid. As the BPU finalizes

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<sup>1</sup> The joint commenters include The Solar Energy Industries Association (SEIA), New Jersey Solar Energy Coalition (NJSEC), and the Mid-Atlantic Renewable Energy Coalition Action (MAREC Action).

their solar plus storage incentive framework, Enel recommends that the BPU release as soon as possible any additional technical or operational requirements they intend to impose but are not included in the straw proposal.

**Question 10: Please comment on PJM queue position as a pre-qualification requirement and the implications of PJM queue reform. If PJM queue position were not a requirement, what alternatives should the Board consider?**

Enel agrees with Board Staff that there should be pre-qualification requirements related to project maturity that must be met by a solar developer to be eligible to bid into the competitive solicitation. Given the desire to ensure more projects can reach commercial operation if they are offered a REC contract, and to avoid speculative bids for projects that will send inaccurate price signals, each project that is being bid into the competitive solicitation should already have a completed System Impact Study and Facility Study. This would provide the greatest assurance to the BPU that a project will be able to reach COD within the three-year timeframe following the solicitation award since much of the timing uncertainty regarding the PJM interconnection process will have already been addressed. In PJM, the Interconnection Agreement immediately follows the completion of the Facility Study, but the project's energization date is driven by the transmission owner's ("TO") timeline for building the interconnection facilities and network upgrades. This last construction step can take a substantial amount of time. On average, there is a 12-to-36-month timeframe between the completion of the Facility Study and the project's energization date. More importantly, a project owner should know the timeline once a project has a completed Facility Study and therefore can decide whether to submit a bid that requires an in-

service date within 24 months from award. However, the BPU should still consider requests for timeline extensions if there are delays that are outside of the control of the project owner.

In addition, each project should be required to demonstrate site control, right of way (“ROW”) control, and some evidence of community engagement prior to bidding into the competitive solicitation.

## **Conclusion**

We appreciate the BPU’s careful consideration of the CSI program design and openness to input from industry stakeholders who bring decades of experience developing renewable energy projects across the country. Enel is ready to invest in helping New Jersey meet its clean energy goals and looks forward to collaborating with the BPU to craft a successful program. Collectively, these recommendations will help ensure that New Jersey maintains its place as a national leader in solar and achieves the state’s aggressive clean energy goals. Thank you for considering these recommendations.

Respectfully,

*/s/ Adam Stern*

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