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BECAUSE AGRICULTURE MATTERS!

To: Secretary of the Board, NJBPU

From: Ryck Suydam, NJFB President

Date: 20 June 2022

Subject: Section IV. A – Solicitation Tranches

New Jersey Farm Bureau supports a BPU policy that protects prime farmland while respecting property rights in the Competitive Solar Incentive (CSI) program. Because of this, we encourage the proposed choice for Solicitation Tranches (categories), allowing for an initial competition of all projects from Tranch 1 (Basic Grid Supply – greenfields including farmland), Tranch 2 (Grid Supply on the Built Environment) and Tranch 3 (Grid Supply on Contaminated Sites and Landfills – brownfields) and then continuing to do so on an annual basis.

It was noted that at equivalent prices, Grid Supply on the Built Environment or Grid Supply on Contaminated Sites and Landfills is preferred to grid supply located on greenfield sites. One potential scenario of the procurement, therefore, is that 250W of awards are made to these tranches, and zero are made to greenfield projects. We believe in a balance of project siting, and do not want to see projects on farmland entirely discouraged as was done in the Community Solar Pilot Program.

We also encourage development outside of county agricultural development areas (ADAs) before approving projects inside the ADAs on preferred soils (capped at 5% per county ADA prime and statewide significant soils). We agree with the BPU assessment that without the 5% cap per county, there will be negative impacts to agriculture, including farm viability. We support the 2.5% statewide cap and the 5% per county cap applied independently.

The proposal does not include a recommendation for dual-use (agrivoltaics) projects to receive a higher incentive through the CSI program. We encourage using the pilot program for dual use as evidence for specific program carve outs in future rounds of the program.

Thank you for this opportunity to comment.

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cc: Senator Bob Smith, Chairman of Senate Environment Committee
Douglas Fisher, Secretary of Agriculture
Dave Defrange, State Board President
Susan Payne, SADC Executive Director