



PowerFlex

805 3rd Avenue, 20th Floor  
New York, New York 10022  
[www.powerflex.com](http://www.powerflex.com)

July 19, 2022

Carmen D. Diaz  
Acting Secretary of the Board  
44 South Clinton Ave., 1st Floor  
PO Box 350  
Trenton, NJ 08625-0350

**RE: Docket No. QO21010085 – In the Matter of Modernizing New Jersey’s Interconnection Rules, Processes, and Metrics**

Dear Ms. Diaz,

Thank you for the opportunity to participate in workshops and comment on the NJ BPU Grid Modernization effort. As a leading installer and operator of solar resources in New Jersey, PowerFlex fully supports the proliferation of this industry in the state and offers these comments with the goal of helping New Jersey meet its clean energy and greenhouse gas (GHG) reduction goals. We understand that the New Jersey Board of Public Utilities (BPU) strives to balance the interests of ratepayers and that of the solar industry. While this is a highly complex objective, we are confident that the further expansion of renewable energy in the state will ensure affordable, safe, and clean energy for years to come. Accordingly, PowerFlex comments on the New Jersey utilities & interconnection application process.

**New Jersey Utility & Interconnection Applications**

Over the past two years, PowerFlex has submitted numerous interconnection applications to PSE&G, JCP&L, as well as ACE. Below are some common delays and challenges PowerFlex has experienced throughout the interconnection application review process:

- Acceptance of interconnection applications in a timely manner
- Initiating technical reviews in a timely manner
- Providing impact study cost letters in a timely manner
- Insufficient visibility into where the application stands at any given time
- Inability to determine current MW capacity for certain areas throughout the state
- Timely communication from utility personnel when inquiring for more info on deficiencies seen on apps



- Acceptance of payments in a timely manner
- Actual utility upgrade amounts surpass the typical +/- percentage provided in impact study cost letters

In order to adhere to project requirements and obtain interconnection agreements in a timely fashion, PowerFlex suggests that the BPU update the interconnection process in the following ways:

1. Implement an interconnection application portal for all utilities
2. Standardize interconnection processes across all investor-owned utilities
3. Update hosting capacity maps to include timestamps on a quarterly basis

Thank you again for your continued efforts to improve New Jersey's distribution grid interconnection policies and process. PowerFlex supports the Board's continued efforts and looks forward to continuing to help work towards a clean energy future for New Jersey. Please do not hesitate to reach out for further assistance.

Respectfully Submitted,

/s/ Vivek Jani

Vivek Jani

Senior Manager, Development Engineering

973-954-7442