



December 12, 2022

**RE: DOCKET NO.: Q022080540, IN THE MATTER OF THE NEW JERSEY ENERGY STORAGE INCENTIVE PROGRAM STRAW PROPOSAL BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES**

**Trinity Solar Comments**

Trinity Solar (Trinity) has been a leading residential solar installation company in New Jersey since 2004 with over 30,000 installs in the state. On behalf of Trinity, I submit the following comments in response to the Board's Notice of Request for Written Comments. We greatly appreciate the ongoing efforts put forth by the Board on the progression and development of the proposed program and willingness to work with the broader industry to create a viable program for all. Generally, Trinity is in support of the straw proposal, with recommendations.

Trinity appreciates the major goals of the NJ Storage Incentive Program (NJ SIP), in particular the encouragement of long-term investments in energy storage devices which will greatly benefit citizens of the state and assist us on meeting our storage target. Trinity agrees with the broader definition of "Energy Storage" which allows further technological developments to be incorporated.

In reference to Staff seeking comment on NJ SIP, residential customers of the state would greatly benefit from an incentive for every kWh of energy storage capacity installed alongside a performance payment. We are in support of a first come, first served declining block structure of a fixed annual incentive, paid in dollar per kWh for contract term. The initial capacity limit at 10 MW is low and could hinder residential customers from being able to take advantage due to the sharing of a block by both residential and commercial segments. The proposed first year allocation of 10 MW of four-hour storage capacity at intra-year capacity blocks for distributed solar will lead to its exhaustion quickly. Trinity recommends outlining a separate residential storage block to ensure that projects can be submitted without the threat of larger projects consuming capacity and guaranteeing a variety of project types within the program. If a delineation between market segments is not possible, Trinity would strongly recommend a larger storage capacity block for Distributed.

In regards to performance metrics and a fixed incentive payment available for storage resources remaining online and available, we recommend BTM storage not be subject to a required performance threshold. Looking at other market models, like ConnectedSolutions, we see success where this program does not have a performance requirement for BTM and instead, has a performance-based component which rewards participating systems for discharging power

**Corporate Headquarters**

2211 Allenwood Road  
Wall, New Jersey 07719  
[www.Trinity-Solar.com](http://www.Trinity-Solar.com)

**1-877-SUN- SAVES**

Ph: 732-780-3779  
Fax: 732-780-6671

**FOR INFORMATION ABOUT CONTRACTORS AND THE CONTRACTORS' REGISTRATION ACT,  
CONTACT THE NEW JERSEY DEPARTMENT OF LAW AND PUBLIC SAFETY,  
DIVISION OF CONSUMERS AFFAIRS AT 1-888-656-6225.**



when demand is high. We would recommend NJ SIP be consistent with how ConnectedSolutions delineates this portion of their program as customers are likely to ensure devices remain active because of performance payments and the assured ability to not solely rely on the grid. Further, if this proposal can make more administrative efficiencies where available, like eliminating a mandated performance threshold, there is a less likelihood of unnecessary delays which can impact the dispatch and success of this program.

In reference to the measurement of BTM performance, we would recommend performance be calculated at the storage inverter and not the utility meter. As noted in Solar Energy Industries Association's (SEIA) comments on this Docket, other states have experienced challenges which have led to delays and greater costs.

Lastly, we would recommend that projects less than 5MWac have the ability to participate in both the ADI and the NJ SIP. We urge the Board to consider the impact of a fully allocated block leading to a missed incentive to the customer from one program. If a customer can participate in both, this would allow flexibility and assurance that incentives are available and remain attractive to the residential customer.

We want to encourage not only solar system installations across New Jersey but the deployment of both solar and storage systems. With a strong incentive program, such as NJ SIP, New Jersey ratepayers will be able to take advantage of an upfront incentive and the flexibility of having greater energy independence all while assisting New Jersey in meeting our climate goals.

In addition to our comments, we have reviewed New Jersey Solar Energy Coalition (NJSEC) and SEIA's comments and are in full support of their recommended changes and agree with their positions for the residential market segment.

Trinity Solar appreciates the Board for their consideration and their work on this program. We are grateful for this opportunity to comment on the proposal and thank the Board for their time.

Respectfully submitted,

Chelsea Farrell  
Regulatory and Legislative Affairs Associate  
Trinity Solar

**Corporate Headquarters**  
2211 Allenwood Road  
Wall, New Jersey 07719  
[www.Trinity-Solar.com](http://www.Trinity-Solar.com)

**1-877-SUN- SAVES**  
Ph: 732-780-3779  
Fax: 732-780-6671

**FOR INFORMATION ABOUT CONTRACTORS AND THE CONTRACTORS' REGISTRATION ACT,  
CONTACT THE NEW JERSEY DEPARTMENT OF LAW AND PUBLIC SAFETY,  
DIVISION OF CONSUMERS AFFAIRS AT 1-888-656-6225.**