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December 12, 2022

New Jersey Board of Public Utilities  
Acting Secretary of the Board  
44 South Clinton Ave., 1st Floor  
PO Box 350  
Trenton, NJ 08625-0350

Re: BPU Docket No. Q022080540

Dear Acting Secretary:

I am writing on behalf of Weston Solutions, Inc., an employee-owned environmental and infrastructure services firm with significant operations in New Jersey. We are steadfast in protecting our infrastructure, combating climate change, and ultimately, preserving our planet. The straw proposal for the New Jersey Energy Storage Incentive Program marks significant progress toward developing the resources needed to make New Jersey's clean energy vision a reality.

As the penetration of renewable and other forms of distributed energy resources increases, the operational dynamics of the grid will change dramatically. Energy storage will make it easier to manage demand and supply dynamics. This includes managing the short-duration peak power requirement and maintaining the grid's frequency under stress. With their expertise in grid management, utilities are uniquely positioned to develop these needed energy storage resources.

Unfortunately, the straw proposal greatly restricts utilities' contribution to developing the energy storage resources New Jersey needs. PSE&G is ready and willing to play a primary role in developing storage resources, having proposed to develop 35 megawatts of storage. Their participation would help nurture New Jersey's energy storage sector, similar to how PSE&G helped New Jersey establish its solar sector. Weston was among the beneficiaries of PSE&G's solar programs as we were their environmental engineering and permitting contractor for their solar farm program targeting landfills and brownfields. Based on that experience, PSE&G's stellar reputation in this sector is well deserved.

Achieving New Jersey's clean energy goals will require substantial energy storage resources, and all means of developing those resources should be considered. It is our opinion, based on extensive experience working side by side with PSE&G, increased utility participation would help stimulate the growth of New Jersey's energy storage sector. We suggest the Board revise the straw proposal and allow utilities to develop the energy storage resources needed to achieve New Jersey's clean energy vision.

Very truly yours,  
Weston Solutions, Inc.

Sally Jones  
Senior Vice President

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