

December 12, 2022

Acting Secretary of the Board
44 South Clinton Avenue, 1st Floor
PO Box 350
Trenton, NJ 0625-0350

Re: [BPU Docket NO. QO2200540

Dear Acting Secretary of the Board:

I am writing on behalf of Langan, a premier provider of integrated land development engineering and environmental consulting services. Headquartered in Parsippany, NJ, Langan brings more than five decades of expertise and experience to challenging projects around the world. 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 the utility helped New Jersey establish its solar sector. Langan has worked with PSE&G on many projects and based on our experience, PSE&G's stellar reputation 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. 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 the State's clean energy vision.

Respectfully,

**Langan Engineering, Environmental, Surveying, Landscape
Architecture, Geology, D.P.C.**



Robert O. Harris, MPH
Senior Environmental Consultant