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March 15, 2023

Carmen Diaz
Acting Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Ave
Trenton, NJ 08625

Re: Docket No. QO21101186, Competitive Solar Incentive (CSI) Program

Dear Secretary Diaz:

The North Jersey District Water Supply Commission (the "Commission") appreciates the opportunity to respond to the Request for Information ("RFI") issued by Staff of the Board of Public Utilities regarding the registration requirements under the CSI program. The Commission is concerned that the 30 day contracting requirement is not attainable within the contracting requirements for public entities.

The Commission is very interested in participating in tranche 4 of the CSI solicitation. However, in reviewing the post award requirements, we are concerned that the 30-day window is insufficient for execution of *a contract between the primary installer or the third-party owner, as applicable, and the bidder or customer of record*. The Commission respectfully urges Staff to extend the contracting period to one year.

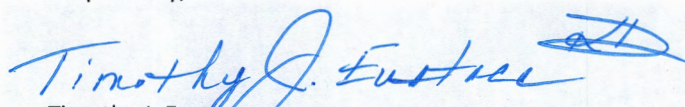
Please see below response to Question #2 from the RFI:

2. What if any, changes to the registration requirement do you consider necessary?

The Commission recommends Staff reconsider the 30-day period for submission of a contract in the registration package. A 30-day window is insufficient for adoption and execution of *a contract between the primary installer or the third-party owner, as applicable, and the bidder or customer of record*. The Commission is a public entity, requiring authorization of the Board of Commissioners prior to execution of agreements by the Commission and a 30 day review period by the Office of the State Comptroller for certain agreements, such as a Power Purchase Agreement. For these reasons, we believe 30 days is arbitrary and impractical. The time requirement should provide the necessary latitude for adequate contract considerations consistent with a 36-month CSI award timeline. The Commission therefore recommends that Staff modify the contract requirement to be delivered within one (1) year of the CSI award.

Thank you for the opportunity to provide comment on this matter.

Respectfully,


Timothy J. Eustace
Executive Director