



**Wednesday, March 15, 2023**

via email: board.secretary@bpu.nj.gov

**Carmen D. Diaz**

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

**Re: BPU Docket Number QO21101186**

Dear Acting Secretary Diaz –

NJR Clean Energy Ventures Corporation (“NJRCEV”) appreciates the opportunity to submit the following comments on BPU Docket Number QO21101186, pertaining to permitting application requirements of the Competitive Solicitation Incentive (CSI) program.

NJRCEV is among the leaders in the New Jersey solar market. Since 2010, we have invested more than \$1 billion in over 400 MW of solar projects across all market segments and counties in New Jersey, comprising about 10 percent of solar installed in the State. This investment has supported more than 1,000 local jobs constructed with union labor, helped our customers save on energy costs, and reduced 330,000 tons of greenhouse gas emissions.

As it pertains to building and electrical permits, we would like to voice our agreement with those stakeholders who initiated this proceeding, that requiring permits (or the application thereof) prior to having incentive certainty is a premature step in the process. The costs required to get to the permit application-stage would be prohibitive for many projects without knowing they will receive an incentive award in the current [or any future] solicitation. Separately, the timing around local municipal and planning board approvals are difficult to predict and are required to advance to the permitting-stage of project development. This is completely out of the developers’ hands and could force projects to miss solicitation deadlines.

NJRCEV believes that the other pre-qualification requirements, including site control, zoning and planning board approvals, and PJM feasibility study or Interconnection approval, are more than enough to ensure that the CSI awards are going to mature projects with a high likelihood of completion.

We appreciate the opportunity to comment on this matter. We look forward to working with Staff and stakeholders to ensure a successful CSI program – which will be critical in meeting the State’s energy goals.

Sincerely,

Steve Osborne Jr.  
Sr. Corporate Strategy Analyst

Cc: Larry Barth, Managing Director Corporate Strategy  
Robert Pohlman, Vice President – Clean Energy Ventures and Corporate Strategy  
Mark Valori, Vice President - Clean Energy Ventures  
Garrett Lerner, Managing Director Development and Finance - NJRCEV