



**Docket No. QO21010085, IN THE MATTER OF MODERNIZING NEW JERSEY'S  
INTERCONNECTION RULES, PROCESSES, AND METRICS**

**CleanCapital Comments**

**April 24, 2023**

CleanCapital appreciates the opportunity to provide written comments on proposed changes to New Jersey's process for interconnecting distributed energy resources (DERs) to the New Jersey electric grid.

CleanCapital is a diversified clean energy investment platform. Founded in 2015, CleanCapital's mission is to accelerate the flow of institutional capital into middle market clean energy projects to further the energy transition. Its deep expertise and focused approach has earned the trust of some of the world's largest institutional investors. CleanCapital actively invests across the full lifecycle of solar and energy storage projects, including during development, construction, and operations. The company has successfully acquired and managed more than 200 operating and new construction projects in 27 states and U.S. territories, totaling more than 400 MW.

CleanCapital offers the following comments on the proposed changes to New Jersey's process for interconnecting DERs to the New Jersey electric grid, which appropriately incorporates near-term and longer-term interconnection reform and grid modernization recommendations proposed by the Solar Energy Industries Association (SEIA), the New Jersey Solar Energy Coalition (NJSEC), and Coalition for Community Solar Access (CCSA).

Specifically, CleanCapital supports the following:

- Application process improvements that create a more uniform, digitally based customer-facing system of interconnection through a common interconnection Agreement Process (CIAP);
- The creation of new ombudsman roles at the BPU and new EDC dispute resolution processes to ensure a neutral third party helps resolve and mitigate interconnection disputes in a fair and transparent manner;
- The creation of a pre-application verification/evaluation (PAVE) process for Level 2 and 3 projects with a nameplate capacity greater than 500 kW;
- The establishment of clear timelines for Level 3 Interconnection Reviews;
- The requirement that for Level 3 Reviews, once an applicant executes a Facilities study Agreement and pays the EDC pursuant to the terms of that agreement, that the EDC conduct a Facilities study that includes a detailed list of necessary electrical power system upgrades and an itemized cost estimate, breaking out equipment, labor, operation and maintenance and other costs, including overheads, for completing such upgrades;

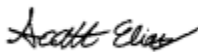
- The requirement that Facilities Studies which are accepted and contracted by Applicants must not exceed 125% of cost estimates made by EDCs;
- More frequent and rigorous hosting capacity requirements through common methodologies and annual Hosting Capacity Analysis filings for each EDC, which should improve the accuracy and usability of EDC hosting capacity maps;
- Bi-Annual Proactive System Upgrade Planning filings for each EDC that identifies targeted proactive circuit and system upgrades aimed at expanding opportunities for DERs;
- Requiring EDCs to a) plan its system to allow for reverse power flow through substations where minor changes to the substation’s control system allow for such flows in a safe and reliable manner and b) prioritize upgrading such control systems in response to interconnection applications that would benefit from such reverse flows;

While the Draft Rules incorporate many of the best practices for interconnecting DERs across the country, CleanCapital supports the Clean Energy Parties comments for additional improvements to New Jersey’s process for interconnecting DERs. CleanCapital reiterates the Clean Energy Parties proposal to create a publicly available interconnection queue in order to provide the development community with sufficient data to submit viable interconnection requests. CleanCapital also supports the Clean Energy Parties proposal for gated deposits that increase as projects move through the review period, such as New York’s “25/75 percent approach,” which will help facilitate a “first-ready; first-served” queuing process. Furthermore, CleanCapital endorses the Clean Energy Parties recommendation to develop a mechanism for multi-beneficiary cost sharing that apportions upgrade costs to both interconnecting DERs and customers at large when such upgrades contribute to decarbonization goals and utility system planning objectives. Finally, CleanCapital supports the technical recommendations offered by the Clean Energy Parties, which seeks to ensure that N.J.A.C.14:8-5 avoids overly conservative technical criteria or screens that are outdated or unaligned with California Rule 21 best practices.

CleanCapital appreciates the hard work by the BPU and staff in undertaking this public stakeholder process regarding innovative, and necessary, steps New Jersey can take to reform interconnection and allow for increased grid integration of DERs and accompanying technologies.

Thank you for considering these comments.

Sincerely,



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