



May 10, 2023

VIA ELECTRONIC MAIL

Sherri Golden, Secretary
New Jersey BPU of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, NJ 08625-0350
BPU.secretary@bpu.nj.gov

**Re: New Jersey Grid Modernization Rules
DOCKET NO. QO21010085**

Dear Secretary of the Board:

Please accept these additional comments on behalf of the New Jersey Solar Energy Coalition (“NJSEC”) regarding the Board’s proposed Interconnection and Grid Modernization Rules, Processes, and Metrics in the above-referenced docket number. NJSEC appreciates the opportunity to submit these comments. If you have any questions, please do not hesitate to contact the undersigned.

NJSEC has been provided a copy of comments submitted by CEP Renewables, LLC (“CEP”) dated May 10, 2023, in this docket. CEP’s comments address a real problem that has recently come to light cost impairing utility-scale solar installations in this state. CEP points out that JCP&L has recently drawn a sharp distinction between its rate-based utility infrastructure and “new” generator interconnection lines when required for “express circuit” construction back to the EDC substation. While our state’s other EDCs routinely extend interconnection lines in accordance with the Main Extension Rules, N.J.A.C. 14:3-8.1, et. seq., JCP&L has most recently taken the position that any interconnection lines from a renewable energy generator must be built by the generator and physically separated from any EDC infrastructure all the way back to the point of interconnection at the substation. That means, of course, that existing EDC pole lines with available circuit space would have to be duplicated on the other side of the street for no apparent reason.

If the state of New Jersey is to achieve Governor Murphy’s vision for carbon free energy, EDCs have an obligation to provide least cost interconnection solutions to support that effort. Clearly, if larger EDC poles are required to accommodate the additional generator “express circuit,” if say, room doesn’t exist on the existing pole line, that would clearly represent an incremental interconnection cost to be borne by the generator. That cost, however, is far less than the prohibitive cost of attempting to secure private easements and municipal approvals to construct a private wire pathway on the other side of the street back to the substation.

JCP&L's new requirement is also at odds with the "private wire prohibition" and safety provisions of Chapter 240 Laws of 2009:

C.48:3-77.1 Utilization of locally franchised public utility electric distribution infrastructure.

4. In order to avoid duplication of existing public utility electric distribution infrastructure, and to maximize economic efficiency and electrical safety, delivery of electric power from an on-site generation facility to an off-site end use thermal energy services customer as defined in section 3 of P.L.1999, c.23 (C.48:3-51), shall utilize the existing locally franchised public utility electric distribution infrastructure.

It should be a requirement that EDCs work with developers to create a least cost interconnection solution, including overbuilding existing EDC infrastructure and utilizing existing EDC rights-of-way and other equipment, so that reasonable costs of interconnection and network upgrades associated with the interconnection are borne by generators. Requiring the duplication of existing EDC infrastructure with private wire solutions on the opposite side of the street will not be welcome by area residents nor municipalities, and as is observed in C.48:3-77.1 above ignores economic efficiency and the safety of our state's IBEW lineman.

If this situation is not corrected, as pointed out in CEP's comments, it has the very real possibility of derailing the state's renewable energy program and making it impossible for the state to achieve its goal of 100% renewable energy by 2035. We support CEP's recommendations as made in CEP's comments. We hope that the Board will incorporate these recommendations in the grid modernization rules.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Fred DeSanti". The signature is written in a cursive, slightly slanted style.

**Fred DeSanti, P.E.
Executive Director, New Jersey Solar Energy Coalition**