Ecogy Energy
315 Flatbush Ave. #393
Brooklyn, NY 11217

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VIA ELECTRONIC FILING
Sherri Golden
Secretary of the State of New Jersey Board of Public Utilities
44 South Clinton Ave, 1st Floor
PO Box 350
Trenton, NJ 08625-0350

RE: QO22030153 - Response to Request for Comments IN THE MATTER OF THE COMMUNITY SOLAR ENERGY PROGRAM

Dear Secretary Golden,

Ecogy Energy, based in Brooklyn, NY and founded in 2010, is an experienced developer, financier, and owner-operator of distributed generation projects across the U.S. and Caribbean.

Ecogy's focus and niche is on the <1 MW arena, particularly on systems sited on rooftops, parking lots, and brownfields. Ecogy is committed to developing distributed energy resources, including battery storage both in front-of-the-meter and behind-the-meter. Ecogy believes that with sound planning, proper development, and fair incentives for these types of projects, the State, its residents, and the clean energy industry as a whole will ultimately be more successful. Ecogy firmly believes that by focusing on such projects constructed in and on the built environment, the development community can preserve precious and limited natural resources while directing the benefits of local solar to small businesses, property owners, nonprofits, low-income individuals, and other organizations that need them most.

Ecogy appreciates and supports the New Jersey Board of Public Utilities ("NJBPU," "BPU," or "Board") in its leadership in solidifying and making permanent the community solar program in the state. We commend the Board for engaging with stakeholders on this important issue, and we especially thank Veronique Oomen and Sawyer Morgan for their hard work.

Please accept the comments below as Ecogy Energy's response regarding docket No. QO22030153 IN THE MATTER OF THE COMMUNITY SOLAR ENERGY PROGRAM.

Proposed Community Solar Energy Program parameters

Program Eligibility

Project Siting

Ecogy agrees with implementing siting restrictions and requiring all community solar projects to be located on preferred sites like rooftops, parking lots, floating solar, and brownfields. Siting on the built environment should continue to be favored to limit harm to the natural ecosystems in New Jersey and to avoid the destruction of valuable forested land and other critical habitats. One example of devastating environmental effects due to solar installations can be seen in Rhode Island; more than one thousand acres of forested land in Rhode Island have been cleared for solar development between 2018 and 2021.[1]

Program Capacity

Overall Program Capacity

Ecogy appreciates the capacity set for EY24 and EY25 of 225 MW each; we also appreciate the flexibility in saying "at least" 150 MW in EY26 and beyond. We would encourage the Board to lean into the flexibility built into this program in years to come, as the Straw indicates that the capacity allocation of at least 750 MW cumulatively from EY22 to EY26 can be increased depending on market conditions and the Board's policy priorities. Ecogy urges the board to prioritize community solar in their policy agenda in the present and in the coming years.

Ecogy strongly disagrees with the Staff's recommendation against creating a new provision for reallocating capacity that had been previously assigned to projects that fail to reach commercial operation. While there may be a time lag in accounting for additional capacity between a missed completion deadline and reallocating that failed project's capacity, it is imperative to maximize the power potential of community solar for New Jersey's grid. We think the administrative burden in implementing this new provision is indeed necessary to preserve the potential for other, better projects to earn conditional acceptance into the CSEP program in the future. If projects drop out of the program or fail to reach commercial operation, that unused capacity should not go to waste and should instead be reallocated to a future project. We recommend using timestamps to implement a waitlist of projects, and the focus should be on ranking;

[1] Solar fields are contributing to deforestation in Rhode Island. Advocates want to change how the state incentivizes development. https://thepublicsradio.org/article/solar-development-forest-loss

projects that scored the most points should be re-entered into CSEP if capacity becomes available. If two projects have the same amount of points, the project that was submitted first according to the timestamps should be selected. The Straw itself acknowledges that demand for the CS Pilots far exceeded the capacity available, with 652 MW in PY1 applying into a 75 MW program and 804 MW in PY2 applying into a 150 MW program. It is inadequate to merely recommend that the Board reserve the right to reallocate any unallocated capacity to future years; if the market performs the way it has in the 2 years of the Pilot Program, demand will far outweigh the supply of capacity available. We can assume that there will not be any unallocated capacity, to begin with. Thus, Staff must recommend that a new provision for the reallocation of failed projects' capacity be included in the CSEP.

Program Capacity Segmentation

While Ecogy agrees with the Staff recommendation to divide available capacity among the four Electric Distribution Companies (EDCs) based on their respective average percentages of in-State retail electric sales to make the capacity blocks proportional to the distribution of potential subscribers, we strongly urge the Board to adopt further capacity divisions by project type and size, as can be seen in other state markets such as Massachusetts SMART program. There should be a minimum allocation for projects with systems between 250 and 500 kW in size. There should also be designated allocations for rooftop and canopy projects; canopy projects should receive a minimum percentage of at least 10% of applications for each EDC block. There have not been any canopy projects approved in the past, so this designated allocation would help diversify the community solar system portfolio. Additionally, 5% of the program capacity should be allocated to landfill projects. There should be a 25% maximum of the total program MW capacity allocated for one single developer to prevent monopolization of the program awards and to encourage diversification in the solar workforce in the state.

Qualifications for Project Ownership

Ecogy commends Staff for recommending that the EDCs not be permitted to develop, own, or operate community solar projects. Developers can bear the brunt of the risks and costs that come with developing a community solar project instead of shifting those risks and costs directly to the ratepayer through EDC ownership, and we agree that this structure prevents the potential competitive advantage of EDCs.

Application Process and Project Selection

Ecogy believes that under the first-come, first-served mechanism, the tie-breaker metric must be reconsidered, and the windows for open applications should happen quarterly, or at least more than once per year.

Ecogy's response in May 2022 to the 20 questions posed by the BPU regarding CS does not align exactly with the rationale provided for choosing a first-come, first-served project selection scheme. However, we recommended that projects rank higher with preferred criteria such as being installed on brownfields, rooftops, and affording housing complexes as well as the level of community involvement and Low- and Moderate- Income (LMI) percentage of subscribers. We appreciate that many of these aspects made it into the requirements to apply for this program.

A first-come, first-served application process will make the administration of the program easier for the BPU, but Ecogy is concerned about the tie-breaking criteria. With the first-come, first-served mechanism, it is sensible to make provisions for a case where capacity blocks are filled quickly. If the block is oversubscribed, relying on the minimum guaranteed bill credit savings rate projects could offer to subscribers will incentivize developers to "race to the bottom," or have to make their projects nearly (or actually) uneconomically viable to compete with the unknown guaranteed bill credit savings their competitors are submitting. In this way, the process almost returns to a competitive solicitation. This method could also result in different discount rates within different EDC territories for different project types, eliminating the fair standard to break the tie. Also, what would happen in the event that multiple projects have the same highest discount but allowing them all into the CSEP would exceed the MW capacity for that application window?

Additionally, you may receive some ingenuine promises from developers without the integrity of lofty guaranteed bill credit savings that they cannot actually deliver on. One stakeholder at the April 24th Stakeholder Meeting, Nicole Miller from the Newark Environmental Commission, brought up a good point – Projects should be clear in how they will afford any discounts they offer, and there should be consequences for failing to meet guaranteed discount percentages.

Instead, other criteria should be considered for a tie-breaker. One possible criterion to use is project maturity. Though the CSEP has high project maturity standards for merely submitting an application already, the maturity milestones used as tie-breakers would have to differ from those already built into the requirements. For example, showing more quantifiable and substantial community engagement than is required through the community engagement plan could be a decent tiebreaker. To eliminate subjectivity, this could look like the Board could provide forms for developers to use. The forms could include a form for a letter from a mayor, a form for a municipal resolution, and a form for a community benefit agreement.[2] If you get a signed letter from the mayor of the town where the project is located, you get one point; if you get a letter from the mayor of an adjacent town, you get another point; if you get a resolution from the municipality, you get 2 points, and so on. This is a chance to prioritize projects which provide community benefits beyond just the bill savings discount.

[2] U.S. Department of Energy. Community Benefit Agreement Toolkit.
https://www.energy.gov/diversity/community-benefit-agreement-cba-toolkit

Regardless of what the Board ultimately decides to make the tiebreaker, it must not be the minimum bill credit savings or any other metric that instills harmful and unintended competition between developers.

The other central issue to the project application process is its time constraints, as the current Straw provides for only one application period per year. We strongly suggest that the applications open on a quarterly basis so that projects apply for the CSEP when they are actually mature and ready to develop further. The current once-per-year design will result in a rush of developers all at one time not only overwhelming the BPU's ADI staff and portal but also overwhelming the EDCs which will not be able to efficiently manage an influx of applications for interconnection all at once. Spreading the application windows out across the year reduces stress on the BPU, EDCs, and developers, and it reduces the risk of queue squatting, where projects sit in the queue stagnant for an extended period of time. This spreading out of the application windows across one year will also help subscribers as there won't be bunched-up waiting lists or rushes to get subscribed in one short window of time.

Minimum Project Maturity Requirements

Ecogy supports Staff's more stringent project maturity requirements as they will help weed out nonviable projects and reserve capacity for those projects which are more mature in the development process. Ecogy does have some concerns about the requirements though, outlined below.

- Part 1 Interconnection (IX) Agreement
    - Having a completed and executed Part 1 IX agreement for projects greater than 1 MW and having proof of application of the Part 1 IX agreement for projects less than or equal to 1 MW is a hefty but manageable maturity requirement. **However, achieving this milestone in time for the opening of the CSEP application portal is only possible if the EDCs allow developers to apply for interconnection now, before the program is open.** We agree and vehemently support Staff's recommendation that EDCs open their applications for interconnection into this program as soon as possible. There will be undue burden placed on the EDCs when the CSEP officially opens as developers will be in a rush to move through the IX process. Instead, if the BPU could work with EDCs now and direct them to allow CSEP IX applications, they would avoid the fast rush of applications all at once, and everyone would avoid lengthy cues and delayed project timelines.
    - Ecogy is aware of the Pre-Application Verification/Evaluation ("PAVE") process described in the ongoing grid modernization proceeding, and this will be a useful tool when implemented. However, we worry that EDCs

will not implement the PAVE process and other grid modernization strategies soon enough, so the Board must prepare for a scenario in which the CSEP is open for applications but the PAVE and other grid modernization have not yet begun.

- All non-ministerial permits
    - Staff should consider allowing projects to apply for the CSEP with only having proof of applying for permits, not necessarily receipt of them, as this process can be extremely time-consuming and costly. Staff could also include proof of stakeholder feedback incorporated into permits as a requirement instead of receipt of permits. Ecogy plans to engage residents and stakeholders in the permitting process through town hall-style meetings. **It is unfair for developers to have to undertake the risk and enormous amount of upfront work associated with permitting if the project does not have conditional acceptance into the CSEP yet.**
    - Challenges of acquiring permits include receiving planning board authorization which usually takes a significant amount of time, especially in townships and villages. These smaller municipalities are not always knowledgeable about solar code, organized, nor efficient in their processes. Permit approvals require a municipality's time, effort, and money, therefore the state should avoid stringent, time consuming, and unnecessary guidelines and requirements that further delay the process.

The State of New Jersey's Role in Supporting Cost-effective, Efficient, and Streamlined Permitting Processes

The New Jersey Community Solar Program should create educational materials outlining best practices for solar project siting and suggested zoning and planning code considerations to be provided to local jurisdictions to allow for increased efficiency in project approval, bringing the benefits of Community Solar to the participating neighbors in a timely fashion. Upon Ecogy's review, a number of local jurisdictions have strict rules around projects that qualify as a permitted use under their bylaws, which are restrictive and would not allow for a community solar project to be viable, even when such a project is located on a rooftop or parking lot impervious surface. Such jurisdictions include Cherry Hill, Galloway and Tinton Falls, which each state the following in their bylaws:

> "The primary purpose of a small wind or small solar energy system will be to provide power for the principal use of the property whereon said system is to be located and shall not be for the generation of power for commercial purposes…"

Tinton Falls, for example, is located within Ocean Township which has more lenient solar regulations under Ordinance 2387: “Solar energy systems that may be mounted on the building or on the ground and are not the primary use of the property shall be allowed in any zoning district… This section applies to solar energy systems to be installed and constructed for residential or commercial use.” However, since the Borough of Tinton Halls has stricter solar regulations, projects that the Township would normally allow to be permitted by right will require additional processes, including an appeal to the Borough Zoning Board, and possibly a time-intensive and costly amendment to Borough Zoning Bylaws for all parties.

The aforementioned educational materials to be provided should include and recommend that local jurisdictions should allow for community solar projects to be permitted by right, so long as they fall within the required dimensional and aesthetic regulations enforced by the Zoning Bylaws. Community Solar should not be classified as a commercial purpose, as the intent behind the solar project is to bring affordable and clean energy to residents, reducing rapidly rising conventionally sourced utility bills. For the Community Solar Program to be a success, all jurisdictional authorities within the State of New Jersey should be encouraged to amend their bylaws to allow for access to this program. The BPU should provide draft language for local jurisdictions to reference when considering an amendment to their local bylaws to allow for an expedited adoption process in anticipation of the state community solar program opening for participation.

- Subscriber acquisition plan with a registered subscriber organization
    - Partnerships with community organizations and municipalities are crucial to acquiring subscribers, but developers need to have advanced notice of specific items required in this plan, such as a letter of approval or affidavit.
- Community Engagement Plan
    - While Ecogy wholeheartedly believes that community engagement is vital and central to a successful community solar project, we are concerned that the current language in the Straw fails to describe quantitative metrics as a benchmark for the completion of this project maturity requirement. Ecogy does not want to complete a community engagement plan, only for it to be viewed as incomplete by the BPU based on subjective standards and measures. All developers should understand exactly how their community engagement plans will be assessed for satisfactory completion.
    - Quantitative metrics include a signed community benefits agreement (which includes events the developer plans to do, educational opportunities, and resources the developer plans to provide), a letter of engagement, and signed letters from municipalities and mayors expressing support for the project and proof of engagement.

Other project eligibility criteria

Ecogy has no comment on this section.

LMI access

Definition of LMI subscriber

Ecogy takes no issue with the definition of an LMI subscriber as a household having an adjusted gross income below 80 percent of the area median income, as determined by annual United States Department of Housing and Urban Development HUD income limits, and qualified affordable housing providers.

LMI participation

Ecogy appreciates the alignment of the CSEP LMI participation standard with the Inflation Reduction Act (IRA) investment tax credit (ITC) LMI adder. Requiring a minimum of 51% LMI subscribers for all projects is suitable.

LMI Income verification standards

Ecogy commends Staff for suggesting a broad range of methods to verify LMI subscribers' income. Medicaid, Supplemental Security Income (SSI), Supplemental Security Disability Insurance (SSDI), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Temporary Assistance for Needy Families (TANF) are the listed programs included in the Straw to verify that a subscriber falls into the LMI category. Though this may not yet be a comprehensive list, we suggest that the Board also include the Supplemental Nutrition Assistance Program (SNAP) and the Low Income Home Energy Assistance Program (LIHEAP) in this list.

Allowing subscribers to provide written attestation of their LMI status is extremely beneficial to both the subscriber trying to participate in the clean energy economy and to the developer who is trying to give LMI populations easier access to community solar. Eliminating unnecessary and excessive paperwork lifts the burden off LMI customers who want to partake in the clean energy economy. This aspect of the Straw must stay through to the permanent program's final rules/guidelines. Ecogy agrees with the Staff's suggestion of utilizing a third party, to be managed by the Board, to audit subscriber lists using self-attestation, and using a standardized form and recording process is critical here, too.

Participation by affordable housing providers

Ecogy agrees that master-metered housing should benefit from the CSEP, too. Passing on 75% of the electricity bill savings to residents in the form of direct payments at least once per year while the housing provider keeps 25% to "provide general benefits to the residents" is a bit of a steep split, especially when there isn't an explicitly described way to track how the housing provider is spending their bill savings to benefit the residents. Staff should consider giving 80% of the electricity bill savings to residents and 20% to the housing provider so long as the 20% stays within the property to be directly reinvested into the expenses of common areas or other expenses that directly benefit the residents of the building.

Bill Credits

Value of the bill credit

"*The bill credit is applied to supply and delivery charges but not non-bypassable charges or demand charges."*

Ecogy asks the Board to reconsider this structure. The value of the bill credit for master-metered affordable housing should be replicated for commercial projects too, such that credits apply to demand charges throughout the CSEP.

Bill credit banking/excess bill credits

Only allowing a subscriber's excess net bill credits to be carried over for 12 months and then to be paid at the EDC's avoided cost of wholesale power does not take into account the churn due to subscribers moving or canceling their subscription. It also does not take into account the lag in EDC reporting of subscribers. Even if there is a waitlist of subscribers, they're not locked into any specific project, so this is not an acceptable method to hedge against churn.

Ecogy suggests Staff allow for 24 months of credits carrying over monthly billing periods instead. This aligns more accurately with the amount of churn often seen in community solar subscriptions, and it is a more appropriate policy as LMI communities often move more frequently than other income demographics.

Consolidated billing

Ecogy strongly supports consolidated billing as a requirement for the CSEP.

We believe in consolidated billing, but having a third party allows for competitive administration of consolidated billing, aiding in the quality and timeliness of services. We

do not want the EDCs to have a monopoly over the consolidated billing process, so they should give the option for EDC billing but also the option for third-party billing, leaving the decision up to the developer.

Project Interconnection

Interconnection process

As part of the grid modernization proceedings (QO21010085), the draft interconnection rule amendments under § 14:8-5.9 describe interconnection reporting requirements for EDCs. We implore the Board to make the EDC reports publicly available and up to date in real-time. In addition to reporting the number and generating capacity of customer-generators that applied for interconnection, successfully interconnected, and dropped out at each stage of the process, the EDCs should also have to report a live time interconnection queue described by the type of project, its status, its expected operation date, its size, the date on which the project applied for interconnection, as well as the address and/or zip code of the project which still preserves customer confidentiality. These same metrics listed above should also be accessible to those undergoing the Pre-application Verification/Evaluation (PAVE) process.

Having access to real-time updates of the interconnection queue, especially through the newly upgraded and modernized interconnection portal proposed in the grid modernization proceedings, will help developers, EDCs, and the Board alike. Developers would be able to more wisely allocate their resources into projects that don't have long interconnection queues which would more efficiently and effectively deploy distributed energy resources (DERs) on the grid. EDCs would benefit by receiving external feedback from their public reporting, allowing them to refine and improve their own processes. The BPU would benefit from deploying DERs faster and keeping closer tabs on the EDCs which aids in regulating them properly.

For example, the Baltimore Gas and Electric Company (BGE) in Maryland provided extremely detailed queue information as part of their Community Solar pilot program.[3] More transparency like this is necessary to meet the goals of this Straw and of the State.

Additionally, the following quote from the Straw Proposal is one of the most important throughout the entire document.

[3] BGE Community Solar Pilot Program Application Listing
https://www.bge.com/SmartEnergy/MyGreenPowerConnection/Documents/BGE_CSEGS_QUEUE_PilotApplicationList.pdf

However, Staff recommends that the EDCs be directed to immediately begin accepting applications for interconnection ahead of a project's application for participation in the Permanent Program.

Ecogy strongly supports the above sentiment. If a requirement of either application for or completion of the Part 1 Interconnection Agreement is to stay as a minimum barrier to entry, the EDCs must be willing to accept applications for interconnection before projects even apply for the CSEP. Especially to avoid a situation where the EDCs are trying to handle a flood of interconnection applications for the CSEP program all at once, this recommendation must be implemented as soon as possible.

Distribution system support

New Jersey's grid will surely be supported by battery storage, and Ecogy participated in the stakeholder comments period under that docket. We agree with the Staff recommendation of generally supporting the storage and grid modernization proceedings, but not requiring storage as part of the CSEP.

ADI Program

ADI Program Registration

Simultaneously and automatically registering projects accepted into the CSEP into the ADI Program is extremely sensible and helpful for developers of community solar projects. This provision should be kept in the final guidelines.

SREC-II values

Ecogy finds it acceptable to maintain the current ADI Program incentive of $90/MWh for LMI community solar projects, which would apply to all projects.

Community Solar Subscribers

Number of subscribers

Maintaining the 10 subscriber minimum and removing the maximum number of participating subscribers to each project is suitable. Maintaining the requirement that no single subscriber may subscribe to more than 40% of a project's energy production is also acceptable.

Geographic distance between project and subscribers

As noted in Ecogy's May 2022 comments, we agree that there should be no restriction on the geographic distance between a project and its subscribers. Providing EDC-wide permission to subscribe makes it much easier for subscribers and developers alike to have a successful community solar project.

Without a preference for projects to serve the municipality or county in which they're located, the Program can maintain focus on local communities by adding a workforce development aspect to the project requirements. Training and/or hiring local labor is a great way to get the local community involved in a community solar project, even if subscribers come from elsewhere.

Consumer protection

While Ecogy understands the desire for the CSEP to maintain a minimum of 10% bill credit savings for subscribers, this level of savings makes certain projects difficult to develop when considering project economics.

Ecogy proposes that the minimum credit savings required be segmented and reduced to 5% for non-LMI customers while maintaining 10% savings for LMI customers in carport/ canopy projects. Canopy projects are more expensive to build than rooftop projects due to their physical structure being within the ground. Structural permitting, soil, geothermal, and other earth science studies require considerably more capital than the permitting that is required for rooftop projects. Also, the actual racking and components necessary for a canopy are more expensive than those of a rooftop solar installation.

Solar project costs are increasing in many neighboring states, and community solar programs are facing similar contemplations about bill savings. For example, New York requested stakeholder feedback on their Inclusive Community Solar Adder (ICSA)[4] in fall 2022. Ecogy submitted comments on the ICSA and found that a 5% discount was far more feasible and economically viable than the 15% the ICSA originally proposed. We feel similarly about the 10% minimum discount, especially on carport canopy projects.

The CSEP should be focused on breaking down barriers to LMI solar adoption—not increasing them with burdensome application requirements. These barriers through regulatory requirements halt most small-scale developers from undertaking community solar efforts.

[4] NYSERDA ICSA https://www.nyserda.ny.gov/All-Programs/NY-Sun/Contractors/Dashboards-and-incentives/Inclusive-Community-Solar-Adder

Most developers will have to lower their minimum discounts because of project economics unless a substantial incentive adder was applied, but that's not possible with the ADI incentive already locked in. Thus, the element that is still malleable—minimum discount—should be reconsidered and lowered.

Automatic enrollment

Ecogy agrees that automatic enrollment should be an option in the CSEP. To ensure customers being subscribed under automatic enrollment are LMI, use the Board-conducted audits described under section 11 of the Straw, "LMI Income verification standards."

Other

Community Engagement

Ecogy greatly appreciates the Community Engagement Plan requirement for application into the CSEP. Actively engaging with the communities where projects will reside is crucial, but as stated above in the Minimum Project Maturity Requirements section of these comments, we are concerned that the current language in the Straw fails to describe quantitative metrics as a benchmark for the completion of this project maturity requirement. The list of aspects that must be included in the Community Engagement Plan is a good start, but is not nearly comprehensive or quantitative enough to see meaningful positive community impact. Potential quantitative metrics to require include a signed community benefits agreement (which includes events the developer plans to do, educational opportunities, and resources the developer plans to provide), a letter of engagement, and signed letters from municipalities and mayors expressing support for the project and proof of engagement.

Ecogy also suggests that workforce development be included as a way to make projects more localized and to potentially serve as a tiebreaker instead of bill credit savings.

Other rules

Ecogy supports the Staff recommendation to include an option "to test new models for low-income community solar projects including, but not limited to, ownership of community solar assets by low-income subscribers" so long as ownership models outside of this are still permitted and that subscriber ownership does not become a requirement.

Energy Accounting

Community Distributed Generation (CDG) is a key instrument for New Jersey in meeting its lofty renewable energy and equity targets. To avoid substantial CDG billing problems and delays, utilities should make the appropriate technological investments or staffing decisions to deliver an acceptable level of service to CDG customers and developers. The Public Service Commission (PSC) in New York State released a straw proposal in September 2022 to address the ongoing Community Distributed Generation (CDG) program billing and crediting issues (such as extremely delayed bill crediting from Con Edison).[5] The Straw Proposal recommended that the Commission establish quarterly utility CDG billing and crediting performance reports, utility performance metrics tied to all CDG crediting and billing, and negative revenue adjustments for failure to meet those CDG crediting and billing metrics. Utilities are also required to be automated, which is projected to help streamline the crediting process. Ecogy recommends the CSEP instate similar initiatives including:

- Timely allocation of credits to customer bills on a monthly basis;
- Accurate allocation and application of credits to customer bills;
- Appropriate customer service and accurate information to CDG customers;
- Timely processing of CDG Host reports;
- Accurate processing of CDG Host reports;
- Accurate reflection of the time period when credits are generated;
- Accurate reflection of the time period when credits are applied to a customer bill;
- Accurate reflection of banked credits as a discrete line item; and
- Regular and detailed reporting on CDG credit allocation.

We thank you for careful consideration of these comments and appreciate your support of the clean energy industry in New Jersey.

Respectfully submitted,

/s

Brock D. Gibian
Vice President of Development
Ecogy Energy
www.ecogyenergy.com
718-304-0945

Twiggy Mendenhall
Policy Manager
Ecogy Energy
www.ecogyenergy.com
718-304-0945

[5] Public Service Commission Session 9.15.22
https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BD7F7F0E0-52A5-4BA9-92E3-FA0F894E4F16%7D