

Request for Comments in the Matter of the Community Solar Energy Program
Docket #QO22030153
Responses from G&S Solar

The Solar Team at G&S Solar would like to begin by congratulating the Staff of the New Jersey Board of Public Utilities (BPU) on a thoughtful and comprehensive Straw Proposal for the permanent Community Solar Energy Program. We are pleased to see that many of our previous comments were considered and implemented.

We have a few comments on the latest Straw Proposal:

- 1) We agree with the Staff's recommendation to make the minimum maturity requirements consistent with those of the ADI Program. However, we believe that requiring an executed EDC interconnection study for projects over 1 MW may prevent some of our larger projects from achieving community solar approval. This feedback goes for both the ADI Program and the Community Solar Program. Our suggestion is to change the requirement to evidence of having submitted a Part 1 Interconnection Agreement, regardless of project size.
- 2) If the BPU ultimately decides to maintain the executed interconnection study requirement for projects over 1 MW, we anticipate that the bottleneck of the community solar approval process will be the interconnection studies and approvals. In that case, the BPU should mandate that the EDCs hire more staff to process interconnection applications and studies.
- 3) We have at least one potential project that is both on a rooftop *and* located on a formerly contaminated site. In the event of a tiebreaker process, we ask the BPU to consider incorporating project siting as a factor and to give preference to project that fall into multiple preferred siting categories.
- 4) We recently submitted an interconnection application for a community solar project to Atlantic City Electric. They told us that community solar approval is required *before* they can process the application. We think it's pretty clear that the BPU Staff's suggestion is the other way around (community approval requires interconnection application/approval), but ACE insisted otherwise. We just want to make sure that once the permanent program rules are finalized, all the EDC project reps are on the same page and clear about the process. If not, this could cause significant delays and create unnecessary barriers to achieving minimum project maturity requirements.