May 15, 2023

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New Jersey Board of Public Utilities
Attn: Docket No. QO22030153
P.O. Box 350
Trenton, NJ 08625-0350

Subject: Comments Regarding Proposed Permanent Community Solar Energy Program in New Jersey

Dear Members of the New Jersey Board of Public Utilities,

We, Associated Energy Developers, LLC, hereby submit our comments in reference to the proposed permanent Community Solar Energy Program under Docket No. QO22030153. While we appreciate the efforts to expand solar energy access and promote community participation, we would like to express our serious concerns regarding the prohibition of ground-mounted solar development in the State of New Jersey.

Prohibiting ground-mounted solar projects would not only limit the potential for solar energy generation but also have adverse impacts on farmers, non-profits, and landowners who stand to lose out on long-term steady revenue that allows them to retain ownership of their property. The lease payments offered by solar projects have provided a vital source of income, enabling these stakeholders to continue their operations and support their communities. By denying ground-mounted solar development, New Jersey risks undermining the financial viability of these entities and jeopardizing the stability of the local economy.

Moreover, not utilizing ground-mounted solar will result in higher costs for New Jersey ratepayers. By relying solely on smaller rooftop and carport installations, the participation in the new program would be limited, leading to reduced economies of scale and increased project costs. Ground-mounted solar installations offer several advantages, including optimized orientation, enhanced efficiency, and cost-effectiveness through larger-scale deployments. By dismissing these benefits, New Jersey would forego an opportunity to achieve more affordable solar energy and potentially burden ratepayers with higher costs.

We acknowledge the importance of a diversified energy mix, but it is essential to ensure fairness and equal opportunities for all renewable energy technologies. Ground-mounted solar projects have demonstrated their effectiveness in delivering significant clean energy capacity, environmental benefits, and economic opportunities. By outright prohibiting their development, New Jersey would undermine its potential to harness abundant solar resources and hinder the state's progress towards a sustainable future.

In addition to the economic and energy benefits, ground-mounted solar installations offer substantial carbon reduction advantages. The environmental concerns associated with ground-mounted solar can be addressed through effective land management practices and careful site selection. While it is true that ground-mounted solar panels replace vegetated areas, it is essential to consider the long-term carbon sequestration potential of solar projects compared to the natural landscape they replace. An acre of solar panels, over its lifespan, can generate significantly more clean energy and mitigate a larger amount of carbon emissions than an acre of trees. Moreover, a compromise approach could be implemented, allowing solar development on land that is already cleared, such as previously disturbed or non-arable areas. This approach strikes a balance between land conservation and clean energy generation, maximizing the benefits of solar development while minimizing impacts on undisturbed natural areas.

By adopting this compromise approach, New Jersey can take advantage of already disturbed or non-arable land to facilitate ground-mounted solar development. This approach would ensure that solar projects are sited on land that has already been cleared, minimizing environmental impacts and preserving undisturbed natural areas. Implementing robust land management practices, including reforestation initiatives and biodiversity enhancements in other areas, can help offset any potential ecological losses associated with ground-mounted solar projects.

By allowing solar development on already cleared land, New Jersey can harness the full potential of ground-mounted solar while addressing the environmental concerns raised by the Board. This compromise approach

promotes responsible land use, maximizes clean energy generation, and minimizes the carbon footprint, thereby aligning with the state's renewable energy and sustainability goals.

While commercial rooftops and parking lots offer some opportunities for solar development, relying solely on these spaces for community solar deployment presents several challenges. Firstly, the percentage of rooftops in New Jersey that would need to be developed to meet the state's renewable energy goals is significant. The sheer scale of rooftop installations required may result in higher costs, longer project development timelines, and limited available space for community solar projects.

Furthermore, it's important to consider the eligibility of rooftops for solar due to various factors such as shading, wrong orientation, obstructions, or structural incapability. Many rooftops in New Jersey may not meet the necessary criteria for efficient solar energy generation. Shading from nearby buildings or trees, unfavorable orientation in relation to the sun, obstructions like chimneys or HVAC equipment, and structural limitations may render a significant percentage of rooftops unsuitable for solar installation. This further reduces the feasible capacity of solar energy that can be harnessed from commercial rooftops alone.

Limiting community solar deployment exclusively to commercial rooftops and parking lots may lead to uneven access to solar energy among different communities. It could disproportionately disadvantage low-income areas or communities with limited commercial infrastructure, where suitable rooftops may be scarce. The goal of community solar is to provide renewable energy benefits to a wide range of participants, including residential customers, renters, and those without suitable rooftops. By excluding ground-mounted solar options, the program may inadvertently hinder the participation and access of these communities, exacerbating existing disparities in renewable energy adoption.

To ensure a more equitable and inclusive community solar program, a comprehensive approach that includes ground-mounted solar development should be considered. By leveraging the potential of suitable cleared lands, New Jersey can broaden the participation in community solar, provide more diverse ownership opportunities, and distribute the benefits of renewable energy across a wider range of communities. This approach would ensure that the program reaches its intended goals of promoting community engagement, reducing carbon emissions, and fostering a more sustainable future for all residents of New Jersey.

Therefore, we strongly urge the New Jersey Board of Public Utilities to reconsider the prohibition of ground-mounted solar development. By embracing a balanced approach that allows for both ground-mounted and other solar installations, New Jersey can maximize its solar energy potential, ensure a competitive market, and provide a fair chance for all stakeholders to participate in the clean energy transition. This inclusive strategy would support long-term revenue streams for farmers, non-profits, and landowners, promoting sustainable land use and economic growth across the state.

In conclusion, Associated Energy Developers, LLC, urges the New Jersey Board of Public Utilities to reevaluate the prohibition of ground-mounted solar development in the state. By doing so, New Jersey can unlock significant solar energy potential, create long-term revenue opportunities for farmers and landowners, and provide ratepayers with more affordable clean energy options. We remain committed to collaborating with the Board and other stakeholders to shape a sustainable and prosperous energy future for New Jersey.

Thank you for considering our comments. We look forward to continued engagement in this important matter.

Sincerely,

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