

BUILDING SOLAR SOLUTIONS



VANGUARD[™]
ENERGY PARTNERS, LLC

May 15, 2023

To: NJ Board of Public Utilities re: Docket No. QO22030153

Dear Members of the NJBPU,

We appreciate the opportunity to provide written comments in response to the request associated with the Staff Straw Proposal for the permanent Community Solar Energy Program (**Docket No. QO22030153**). Below are our comments related to the program.

Our concerns pertain to the siting of projects, project approval, and the criteria used for project selection. While we appreciate the effort to prioritize carports and canopies over impervious surfaces, we are concerned about how these restrictions will impact New Jersey's ability to reach its goal of 100% Clean Energy by 2050. More specifically, the potential cost implications of this approach may render many projects financially unfeasible. Carports and canopies require a significant amount of engineering and design work to ensure they are structurally sound, meet building codes, and are compatible with the existing infrastructure. This additional work can increase the initial cost of the project, as well as prolong the design and construction process. Additionally, canopies and carports may require additional permitting and inspection costs to ensure that they comply with building code design requirements. This can further increase the costs and delay the timeline for the project.

We strongly advocate for the integration of community solar projects into the dual-use program. The combination of solar energy production with traditional farming practices has the potential to maximize land productivity, and create an attractive opportunity for investors. The inclusion of community solar in the dual-use program offers a valuable financial opportunity for both developers and landowners, while contributing to the growth of clean energy in the community. However, with the current language utilized, specifically "impervious surfaces", we are concerned that the programs may not be compatible.

Additionally, we want to acknowledge the impact of the interconnection approval requirement. The additional time for interconnection approval can potentially result in projects receiving reduced incentive values, which could ultimately lead to decreased investment due to increased risk.

Furthermore, we are concerned about the minimum project maturity requirements for the program. Meeting such strict siting requirements for projects that may not be approved could prove very difficult for developers. These additional engineering, design, and permitting costs can increase the initial cost of the project, making projects less economically feasible, especially for smaller solar developers who may not have the financial resources to absorb these additional costs. Furthermore, if a project is not approved due to failing to meet the strict siting requirements, the solar developer may be left with significant costs and no return on investment. This can discourage solar development and hinder the growth of the industry.

We believe that there are alternative solutions that could be implemented to ensure that serious bids are submitted, such as requiring developers to make non-refundable deposits of a substantial amount. This would incentivize developers to submit more competitive bids and ensure that approved projects are completed in a timely manner.

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Thank you for your attention to this matter.

Sincerely,

Shannon Donnelly

William Yen

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