

Borough of Somerville

Mayor: Dennis Sullivan

Council President: RanD Pitts **Clerk Administrator:** Kevin Sluka
Borough Council: Granville Brady ♦ Tom Mitchell ♦ Gina Stravic
Roger A. Vroom III ♦ Fred Wied V

5/15/23

Secretary of the Board
44 South Clinton Avenue, 1st Floor
PO Box 350
Trenton, NJ 08625-0350
Email: board.secretary@bpu.nj.gov

Re: I/M/O the Community Solar Energy Program, Dkt. No. QO22030153
Staff Straw Proposal for the Permanent Community Solar Energy Program

Dear Board Secretary:

This is the Borough of Somerville's ("Borough") comments relating to the Straw pole proposal for the community solar program.

In 2020 the Borough invited solar providers to offer proposals based on the then forthcoming round two of the BPU Pilot community solar program.

At the conclusion of this process the Borough entered into an agreement with CS Energy/Hathaway Solar to remediate 21+/- acres of the former Borough landfill and to install a 10MW co-located solar project.

It should be noted that the Somerville landfill is a NJ DEP designated Brownfield Development Area (BDA).

The agreement included the lease by CS Energy of the 21+/- acres for a twenty (20) year period, the Borough applying to the NJ DEP HDSRF program to obtain multiple grants for the remediation of the site.

The DEP was and remains very supportive of this project as it, a) closes a former garbage facility and, b) will provide clean electricity to the area and low-price electricity to LMI families.

The Borough has applied and received \$8,000,000 towards the \$13.4 million clean-up cost. We propose to apply for the balance allowed under the program (a further \$2 million) this year with BPU approval of this project.

Co-location for this project allows the developer to recover certain costs and the Borough to finally close the landfill and create a public benefit at the same time. We see it as a win-win situation.



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It should be noted that the Borough will be making a direct financial contribution to the cleanup through a separate financial agreement with CS Energy.

We would like to address for the record a question posed for the recent stakeholder workshop.

Section I.1) – Should the Board permit co-location of a community solar project with another solar installation?

The answer is a resounding YES

We believe the definition of contaminated sites and landfills should include landfills, brownfields, and areas of historic fill, which is consistent with the pilot program. The Somerville project is proposed to be located on the former municipal landfill which is also a NJ BDA.

Such projects have significant added benefits allowing for the site remediation and development of land that is otherwise unsuitable for any other form of development. These benefits however come at a cost; as these projects are more expensive and more time consuming due to having extended engineering and permitting processes and added remediation cost of the site. There is a clear public interest and history of BPU support to redevelop these otherwise unusable sites into solar. Solar is the highest and best use for these sites, like our site in Somerville.

We believe the program should be consistent with the pilot program, we planned the whole project's redevelopment and cleanup around the pilot program guidelines. A substantial amount of time, effort and money has already been expended in anticipation of this program role out.

By allowing co-location of community solar projects on former landfills can allows municipality to obtain adequate funding to close these contaminated sites.

It would be very difficult to fund the capping of Somerville's project if we do not have this co-located project contributing towards the landfill closure and contributing through the lease rent to the Borough to offset other costs related to this project.

Sincerely,



Dennis Sullivan

Mayor.