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## **VIA EMAIL**

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

Re: Request for Written Public Comment in the Matter of the New Jersey Energy Storage Incentive Program, Docket No. QO22080540

Elevate Renewables F7, LLC ("Elevate") hereby submits the following comments in response to the New Jersey Board of Public Utilities' request for written public comment in the matter of the New Jersey Energy Storage Incentive Program, Docket No. QO22080540, dated September 29, 2022. Elevate thanks the Board for this opportunity to comment and offer experiential insights and pragmatic recommendations in advance of the final Storage Incentive Program Design issuing.

Elevate is a national developer focused on the development of grid-scale energy storage systems co-located with existing generation facilities owned by private equity funds managed by ArcLight Capital Partners. Such funds currently hold indirect ownership interests in large scale generation resources totaling approximately 25,000 MWs in 9 states nationally (New Jersey, Connecticut, New York, Maryland, California, Ohio, Illinois, Indiana, Arizona). Elevate and its parent, ArcLight Capital Partners, are the largest merchant power producer in the state of New Jersey with 7 generating facilities totaling over 4,000 MWs.

As a national developer, electricity storage operator and electricity generator, Elevate has a significant interest in the outcome of New Jersey's transition to a carbon-free electric grid by 2035 and the ultimate public benefits realized by New Jersey residents, businesses, ratepayers and communities. Elevate is uniquely positioned to provide state-based, grid-scale energy storage, including battery storage, that maximizes use of existing infrastructure and accelerates the State's Front-of-the-Meter storage goals while increasing resiliency and system adaptive capacity during

<sup>&</sup>lt;sup>1</sup> To the extent necessary, Elevate seeks leave to file these Comments out-of-time. Elevate was formed at the end of last year while this proceeding was well underway. Given the recent formation of Elevate, good cause exists to grant Elevate leave to file these Comments, which will help clarify certain issues in this proceeding, provide information helpful to the disposition of issues, and assist the Board in its quest to finalize the Storage Incentive Program.



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disruptive events, reducing costs and supporting deployment of carbon-free, variable and distributed energy resources.

Elevate is focused on a safe, reliable, environmentally conscious energy transition in a way that benefits all stakeholders together with the broader communities, specifically including environmental justice and other disadvantaged communities, in which we operate. Elevate appreciates the opportunity to share these comments.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

Tonja Wicks

Vice President, Regulatory Affairs

Elevate Renewables

## Attachment

Cc:

Eric Cherniss, Elevate Renewables