



Because Agriculture Matters!

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December 13, 2023

Sherri L. Golden, Secretary of the Board
Board of Public Utilities
44 South Clinton Avenue
Trenton, NJ 08625-0350

**New Jersey Farm Bureau comments regarding Docket No. QO23090679
In the Matter of the Dual-Use Solar Energy Pilot Program**

Dear Secretary Golden:

NJ Farm Bureau offers the following comments on the dual use solar straw proposal.

Have a workable control area

Requiring a 50% control area would render potential pilot projects economically and practically infeasible. We urge the board to consider other options that still provide access and data collection for research purposes. We feel some projects may be good for direct comparison of crop production, but that is not the only area of research that needs to be done. Encouraging different practices under and around the installations will also be important for future ag production.

Encourage flexibility in research design and end product objectives

The Pilot program should avoid a narrow focus on exact crop yield comparison between array and non-array conditions. We support the goal of having a diversity of crops, but the projects should also look at different land contours/slopes, conservation practices for runoff, and drip line practices. Also, the program should consider what cropping and tillage changes can be made working around the installation. Projects should also look at battery storage and allowing for on-farm use during power outages.

Clarify dual-use permitting language

The Straw Proposal identifies that dual-use projects are considered "permitted use" within every municipality. The final program rules should further define that dual-use projects do not require a special use or conditional use permit in accordance with statute.

Dual-use projects to serve community solar and low-income communities

We understand from the public hearing the reason the board chose not to link dual use pilot with the community based solar program. We feel this is a missed opportunity for accessing additional Solar Incentive Programs. We ask that the board consider for pilot purposes allowing up to 10MW projects to be allowed in both ADI and CSI programs.

Allow dual-use projects to be studied for interconnection feasibility

Dual-use projects are currently unable to progress in the interconnection queue, placing them at increasing risk of delay while other ADI projects move forward. Projects should be required to apply to the Pilot with information about costs and feasibility. To achieve appropriate project maturity, the Board should immediately direct the EDCs to begin processing dual-use interconnection applications.

Adder Incentives

Adder incentives are needed to offset additional costs farmers may face doing the research required during the pilot. Adders should also cover new equipment, such as irrigation, no till, or unique harvesters, as well as materials needed for additional design constraints.

Allocate capacity quickly and efficiently

We understand the need for a measured approach to approving projects, but strongly feel they should be approved as quickly as possible and not worry about meeting a megawatt/capacity standard. Once an application is approved there is going to be a delay in getting projects underway. We would encourage the board to start the research clock and program clock of three years once a project is underway.

Research Process and Prime Soils

We understand the need for research on prime soils and farms in ADA's but we question the need for two different data collections, especially as it is related to equipment used. If a non-ADA farm is being used but they are using new or unique equipment on their farm for the purpose of the pilot, would we not want to know this? Both applications have areas where if applicable should apply to the project, as projects both in and outside ADA research can prove valuable to farmers going forward.

Thank you for considering our comments and recommendations. Please contact Ed Wengryn on our staff for any follow-up.

Sincerely,

A handwritten signature in black ink, appearing to read 'AC', enclosed within a thin black rectangular border.

Allen Carter
President

Cc: NJ State Board of Agriculture
NJ Department of Agriculture
Dave Specca, Rutgers Cooperative Extension