

December 13, 2023

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

**Stakeholder Recommendations RE: Docket No. Q023090679 In the Matter of the Dual-Use Solar Energy Pilot Program**

Dear Secretary Golden,

The undersigned stakeholders are pleased to submit these core recommendations that will ensure a successful Dual-Use Solar Pilot Program in New Jersey. Thank you for your consideration.

**Allow dual-use projects to serve community solar and low-income customers**

New Jersey's Energy Master Plan prioritizes access for communities that have been historically left out of the clean energy transition. Dual-use projects up to 10MW should be able to provide savings to residential and low-income customers through the community solar permanent program. The Board can leverage the additional capacity created for the dual-use program to expand the equity benefits of community solar, all while preserving farmland and efficiently using ratepayer funds.

**Define a workable control area**

Stakeholders unanimously agree that 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. While a 10% control area would certainly be more manageable, the Board may also consider awarding extra points on its scoring rubric to projects that have a control area, rather than requiring all projects to incorporate this design element.

**Design for practical research outcomes**

The Pilot program should avoid a narrow focus on exact crop yield comparison between array and non-array conditions. Rather, we should design for outcomes that demonstrate how farmers change their practices in an agrivoltaic array and how those practices influence farm viability. The Board can ensure standardization and efficiency by separating out research proposals, and related speculative costs, from the project scoring and award process. Once accepted into the program, developers can then enroll their projects in a centralized research study. Results from this approach will translate to real-world insight that can be used to inform the permanent program.

**Clarify dual-use permitting language**

The Straw Proposal identifies that dual-use projects are considered a 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.

**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.

**Allocate capacity quickly and efficiently**

Given pent-up market demand since 2021, and the delays facing dual-use projects discussed above, the Board should release larger buckets of capacity on an expedited basis. We recommend issuing two solicitations for 100MW each in order to efficiently review applications and get projects in the ground as soon as possible.

Thank you for the opportunity to submit these comments. We remain committed to the design of a workable Pilot program that showcases New Jersey's leadership at the forefront of clean energy and the agricultural economy.

Sincerely,

Kaitlin Hollinger  
Policy Manager  
BlueWave

Scott Elias  
Vice President of Policy & Market Development  
CleanCapital

Charlie Coggeshall  
Mid-Atlantic Regional Director  
Coalition for Community Solar Access

Rebecca Peichel  
Sales Director  
Forefront Power

Lucy Bullock-Sieger  
Vice President of Strategy  
Lightstar Renewables

Stephen G. Campbell  
Chief Operations Officer  
Navisun

Jake Springer  
Mid-Atlantic Policy Director  
Nexamp

Kelly Roache  
Director of Policy & Community Solar  
Renewable Properties

Ed Brolin  
VP, Policy Development & Distributed Government Relations  
RWE Clean Energy