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BECAUSE AGRICULTURE MATTERS!

To: Sherri L. Golden
Secretary to the Board
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From: Allen Carter, NJFB President

Date: 24 June 2024

Subject: Dual-use solar draft rule proposal

NJ Farm Bureau is the largest membership organization that advocates for farming in New Jersey, with over 6,500 members throughout the state representing a \$1.49 billion dollar industry that is responsible for local food security. We have been involved with the dual use idea since the beginning in the Garden State, helping to craft the legislation and commenting on the straw proposal. We are in full support of a diverse variety of projects for this pilot, including row crops, fruits, vegetables and livestock.

We appreciate the changes that have been made, specifically decreasing the size control area from 50% of the project size. However, 3-acres may still be too large for some small-scale projects. For example, a 3.5-acre project would only have a half-acre available for the dual-use portion of the array, which is not large enough size to be profitable. We suggest a 1-acre control plot for farms less than 10 acres and a 3-acre control plot for parcels larger than 10 acres.

It is unfortunate that a concession was not made to link dual use pilot participants with community solar subscribers. Dual-use projects under 5MW will not be competitive in a CSI solicitation due to their smaller size, specialized designs, and therefore higher costs. There is no realistic path to development for a small-size dual-use project under the current rule proposal. Even if projects receive a CSI award, their incentive requests for the dual-use pilot will be much higher than if projects were otherwise appropriately compensated. Providing bill credits to subscribers opens another revenue pathway, keeping costs down within the dual-use pilot itself. Community solar provides so many other benefits that the Board has committed to on other fronts: low-income access to clean energy, promoting distributed generation on the electric grid, guaranteed energy bill savings, and keeping a farm in business with clean energy supporters.

Lastly, we remain concerned about interconnection feasibility.

Thank you for your time and consideration. We look forward to the start of this important pilot program as soon as possible.

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cc: Joe Atchison (Ed Wengryn), Office of the Secretary of Agriculture
Holly Sytsema, State Board of Agriculture President
Brian Schilling, Rutgers NJAES