

IN THE MATTER OF THE DUAL-USE SOLAR ENERGY PILOT PROGRAM

Docket No. QO23090679

Comments of Rockland Electric Company

On June 10, 2024, the New Jersey Board of Public Utilities (“BPU”) issued preliminary draft regulations for the purpose of implementing the Dual-Use Solar Energy Act of 2021¹ (“the Act”). The following are the Comments of Rockland Electric Company (“the Company” or “RECO”).

These Comments address proposed section 14:8-13.13(i), which requires that the NJ Electric Distribution Companies (“EDCs”) track and provide quarterly reports on the interconnection status of Dual-Use Solar Energy Projects. Specifically, the proposed regulation states:

- (i) EDCs shall track the application to interconnect submitted by Dual-Use Solar Energy Projects and submit quarterly electronic reports to Board staff on Pilot Program interconnection status, within 30 days of the end of the quarter being reported upon. The content of the reports shall include, but not be limited to:
 - 1. A list of Dual-Use Solar Energy Projects that submitted an interconnection application, including the project’s name, location, and proposed capacity;
 - 2. A list of Dual-Use Solar Energy Projects interconnected over the previous month, including name, location, and capacity;
 - 3. The cumulative totals since the beginning of the Pilot Program which shall include the total number of interconnection applications received for Dual-Use Solar Energy Projects, total number of Dual-Use Solar Energy Projects interconnected, total capacity of Dual-Use Solar Energy Projects interconnected, and estimated total kilowatt hours supplied to the distribution system by Dual-Use Solar Energy Projects.

The Company recommends that the BPU withdraw proposed section 14:8-13.13 (i).

First, proposed section 14:8-13.13 (i) imposes tracking and reporting obligations on the NJ EDCs that that are not required by the Act, nor can such obligations reasonably be implied from the plain language of the Act. The Act itself simply sets out requirements for participation in the Dual-Use program, and does not include any tracking or reporting requirements by the NJ EDCs.

Second, the tracking and reporting requirements in section 14:8-13.13 (i) are not cost effective. The NJ EDCs already track and report on new solar interconnections, and, as noted above, the proposed Dual-Use regulations include extensive tracking and reporting requirements by the selected projects.

Specifically, with regard to current reporting requirements, pursuant to *N.J.A.C.* 14:8–5.9, the NJ EDCs track and report new solar interconnections, including the number of solar facilities interconnected and their estimated generating capacity. With regard to tracking and reporting in

¹ L. 2024, c. 170.

the proposed Dual-Use regulations, the proposed regulations include a requirement that selected projects include a “Construction, Operations, Monitoring, and Project Research Plan” (“COMPR”), which establishes extensive, minimum monitoring and research requirements for a selected project throughout the life of the project. Proposed section 14:8-13.13 requires updates of the COMPR.

Further, the BPU recently proposed new regulations that address the tracking of interconnections to the NJ EDCs’ distribution systems. As proposed, the regulations require that generators apply for and manage the interconnection process electronically through a portal-based software application platform. As proposed, the platform will be capable of tracking key information throughout the subsequent interconnection application process, documenting generation type and capacity, and incorporating schedules and budgets for upgrade commitments and construction timelines.

Conclusion

For the above reasons, the Company recommends that the BPU withdraw proposed section 14:8-13.13 (i).