

**Docket No. QO21010085, IN THE MATTER OF MODERNIZING NEW JERSEY'S  
INTERCONNECTION RULES, PROCESSES, AND METRICS**

**Comments of the Coalition for Community Solar Access**

**August 2, 2024**

The Coalition for Community Solar Access (CCSA) appreciates the opportunity to provide input on the ongoing Grid Modernization stakeholder proceeding. CCSA remains committed to advocating for policies that facilitate the growth of community solar and enhance grid integration of distributed energy resources (DERs) in New Jersey. We commend the Board of Public Utilities (BPU) for its efforts thus far and offer the following comments on several critical aspects of the interconnection rules.

**1. The definition of “customer generator” in the proposed rules excludes community solar.**

CCSA wishes to call to the BPU’s attention necessary clarifications and revisions to the definition of "customer generator." “Customer generator” is defined as a person or entity that owns or operates electric generation equipment on the customer's side of the meter. This definition appears to exclude community solar projects that do not generate electricity on the customer's side of the meter.

The definition of "community energy system" explicitly includes community solar facilities connected to the distribution grid. This indicates that while community solar projects might not fit the strict definition of a "customer generator," they are still recognized and regulated under the broader framework of grid-connected energy resources.

We recommend revising the definition to explicitly include community solar projects, ensuring that all individuals and entities that contribute to and benefit from community solar are recognized as customer generators under the interconnection rules.

**2. The rule section on the Proactive System Upgrade Planning process should be reinstated.**

CCSA wishes to underscore the importance of the Proactive System Upgrade Planning (“PSUP”) process proposed in the draft interconnection rules. The final rules, however, omit this essential program, which we believe should absolutely be included. Proactive system upgrade planning is vital for several reasons:

- **Efficient Grid Modernization:** By planning and executing system upgrades in advance, New Jersey can ensure that the grid is prepared to handle the increasing penetration of DERs, thereby avoiding bottlenecks and delays in interconnection processes.
- **Cost-Effective Solutions:** Proactive planning allows for the identification of the most cost-effective upgrades, potentially reducing the overall costs for both utilities and customers.

- **Enhanced Reliability and Resilience:** Proactive upgrades can enhance the reliability and resilience of the grid, providing benefits to all ratepayers and supporting New Jersey’s clean energy goals.

The exclusion of the PSUP does not reflect stakeholder consensus but instead adopts redline revisions proposed solely by the Joint Electric Distribution Companies, who rationalized the omission due to overlap with Integrated Distribution Planning process.

Considering the significant stakeholder support<sup>1</sup> the PSUP proposal received, CCSA strongly recommends that the BPU reinstate the PSUP program, at a minimum on an interim basis, while the Grid Modernization Forum discusses integrated distribution planning and proposes a final long-term planning framework.

### **3. Hosting capacity maps should be updated monthly.**

CCSA also advocates for a revision in the update frequency of hosting capacity maps. The current requirement for quarterly updates is insufficient to provide the timely and accurate information needed by developers and other stakeholders. We propose that hosting capacity maps be updated on a monthly basis for the following reasons:

- **Improved Accuracy:** More frequent updates will reflect the latest grid conditions, allowing for better planning and decision-making by developers.
- **Enhanced Transparency:** Monthly updates will provide a clearer and more up-to-date picture of the grid’s hosting capacity, facilitating smoother interconnection processes.
- **Alignment with Best Practices:** Other states have successfully implemented more frequent updates to hosting capacity maps, demonstrating the feasibility and benefits of such an approach.

Therefore, we urge the BPU to amend the final interconnection rules to require that hosting capacity maps be updated monthly. This change will significantly enhance the utility of these maps and support the efficient and effective integration of DERs into the grid.

In conclusion, CCSA appreciates the BPU’s efforts in advancing New Jersey’s grid modernization and interconnection processes. We believe that including the Proactive System Upgrade Planning process and increasing the frequency of hosting capacity map updates are critical steps that will help achieve the state’s clean energy objectives and support the continued growth of community solar.

Thank you for considering our comments. We look forward to continued collaboration with the BPU and other stakeholders to ensure a sustainable and resilient energy future for New Jersey.

Respectfully submitted,

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<sup>1</sup> E.g., See April 2023 comments from Clean Capitol, BlueWave, Ecogy Energy, in addition to comments jointly submitted by CCSA, SEIA, and Vote Solar.

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