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VIA ELECTRONIC MAIL ONLY

Sherri L. Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave.
Trenton, NJ 08625
Board.Secretary@bpu.nj.gov

**Re: In the Matter of New Jersey Grid Modernization / Interconnection Process
Docket No. Q021010085**

Please accept this submission on behalf of Public Service Electric and Gas Company (“PSE&G” or the “Company”) in response to the rule proposals issued by the New Jersey Board of Public Utilities (the “Board” or “BPU”) on June 3, 2024 in the above-referenced matter. In addition to joining in the joint utility comments filed by the New Jersey Utilities Association (“NJUA”), and incorporating by reference its April 24, 2023 submission, the Company highlights the following comments regarding the BPU rule proposals.

PSE&G is steadfast in its support of the Board’s efforts to streamline and enhance the process to facilitate the interconnection of distributed energy resources (“DERs”) with the goal of modernizing the state’s electric grid. The Company has been, and continues to be, deeply engaged in this interconnection rule proceeding and although certain changes have been made to the proposed rules by way of the recent publication, PSE&G remains concerned that the proposed rules do not focus on changes that can be implemented in the near term. Instead, the proposed rules still reference and incorporate more complex issues such as aggregations related to FERC Order No. 2222, which are awaiting final resolution at FERC. Additional discussion and input by stakeholders should be considered to ensure a comprehensive evaluation of these types of involved issues since this process has not been sufficiently extensive, either in scope or timeframe, to properly address these issues.

In addition, clarity is required concerning the programs that have 120-day deadlines to make tariff or compliance filings. Although it is unclear whether the EDCs will be required to fully develop and implement these programs within the four month period noted in the proposed rules, the Company echoes the joint utility comments concerning this proposal—a four month timeframe is insufficient to plan, develop and fully implement the energy storage and solar inverter interconnection procedures, system impact study procedures, common level 3 interconnection review screens, common hosting capacity maps, and dispute resolution process that the proposed

interconnection rules require. As the EDCs recommend in joint comments, this timeline should be extended to one year.

Further, although the Company agrees with the need for consistency among the EDC, the implementation of a process to establish hosting capacity maps should not require a Tariff filing. As the current landscape on the interconnection of DERs and the technology continues to rapidly evolve, requiring a Tariff filing to implement hosting capacity maps will be inefficient and burdensome. PSE&G believes that there is limited benefit of providing developers with the proposed level of detail in hosting capacity maps, particularly since the Pre-Application Verification/Evaluation (“PAVE”) process will satisfy most developer needs. PSE&G’s hosting capacity maps currently provide information that developers would need pre-application. As such, PSE&G believes that the focus should be on the development of a PAVE process that works for both developers and the EDCs. An effective PAVE process greatly reduces the need to have unnecessarily detailed hosting capacity maps that pose a greater burden on EDCs.

Lastly, to further facilitate a streamlined application process, it is extremely important to establish an expiration date for applications that are stalled in the queue because they are incomplete or are non-compliant with the rules. This can prevent creating a log jam of incomplete/non-compliant applications that may prevent other projects from entering the interconnection queue.

The Company thanks BPU Staff for its efforts in this proceeding and appreciates the opportunity to once again provide feedback on the proposed rules.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Danielle Lopez", is written over a light blue rectangular background.

Danielle Lopez