



September 24, 2024

Sherri L. Golden

Secretary of the Board
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 08625-0350

In the Matter of Docket No. QO21101186 – Competitive Solar Incentive (“CSI”) Program

Dear Board Secretary,

MN8 Energy LLC (MN8) appreciates the opportunity to provide the following comments regarding the CSI Program. MN8 develops, owns, and operates renewable energy generation facilities, battery energy storage systems, and electric vehicle charging stations throughout the country. MN8’s New Jersey fleet includes over 160 megawatts (MW) of operating utility scale and distributed solar projects across the state. Today, we provide renewable, affordable energy to over 200 world-class enterprise customers, with an operating portfolio of approximately 3 gigawatts (GW) of solar and battery energy storage projects.

The Board Staff posed “Questions for Stakeholders” to provide feedback on the CSI Program. MN8’s responses are provided below.

Question:

2. Project Maturity Requirements

Project maturity requirements currently include a PJM queue position with a completed feasibility study, site plan, and project details.

Response:

Per the CSI Program rules; to participate in a CSI Program solicitation, a project shall have a completed feasibility study or Phase 1 study. N.J.A.C 14:8-11.10 states:

“(c) To participate in the solicitation, projects shall meet the following requirements:

1. If, subject to the PJM interconnection process, a published PJM feasibility study, a PJM Phase I study, or such equivalent successor PJM study, as the Board shall identify through Board Order, for one or more queue positions that will allow for generation interconnection of the proposed solar and/or storage facility(ies)”

The solicitation's competitiveness is negatively impacted by the requirement that projects have a completed feasibility study or Phase 1 study, particularly given the state of the queue today. If the next solicitation were to follow a similar schedule to the prior solicitation, which opened November 27th, 2023, and closed February 29th, 2024, only projects in Transition Cycle 1 or a prior group would be eligible to participate. This approach would substantially limit the projects eligible to participate in the next solicitation. MN8 assessed the PJM queue as of September 7th and found that only 504 MW are eligible to participate in the next solicitation should the Phase 1 study requirement remain in place (*Appendix 1*). However, an additional 755 MW would be eligible to participate in the next solicitation by allowing Transition Cycle 2 (TC2) projects to participate. If the next solicitation is for 300 MW, this is the difference between having 68 percent more capacity available in the PJM queue to compete for CSI off-take under the status quo, versus 320 percent more if TC2 projects are allowed to participate.

Therefore, we believe that allowing TC2 projects to participate in the CSI Program will materially increase the solicitation's competitiveness and benefit New Jersey ratepayers.

Thank you for this opportunity to provide input on the CSI Program. If you have any questions, please call me at 916-718-1178.

Sincerely,

Stephanie Williams
Director, Government and External Affairs
MN8 Energy LLC

Appendix 1: PJM Queue – New Jersey Snapshot

(1) This list only includes “Solar” and “Solar; Storage” projects; furthermore, it excludes projects that are “In Service,” “Withdrawn,” “Under Construction,” or “Partially in Service – Under Construction.”

Project I	Queue Cycle	Name	Commercial Nat	State	County	Status	Transmission Ownr	MFO	MW Ener	MW Capaci	Fuel	Eligible	If no, rationale
AF1-208	Fast lane / TC1	Laurel-Roadstown 69 kv		NJ	Salem	Active	AEC	45	45	27	Solar; Storage	Yes	
AG1-001	Fast lane / TC1	US Silica-Unimin 69 kv		NJ	Cumberland	Active	AEC	31	31	11.78	Solar	Yes	
AG1-188	Fast lane / TC1	Manitou-Oyster Creek 34.5 kv		NJ	Ocean	Active	JCPL	19.8	19.8	8.316	Solar	Yes	
AG1-189	Fast lane / TC1	Oyster Creek-Bamber Lake 34.5		NJ	Ocean	Active	JCPL	12	12	5.1	Solar	Yes	
AG1-254	Fast lane / TC1	Salem-Woodstown 69 kv		NJ	Atlantic	Active	AEC	38	38	25.3	Solar; Storage	Yes	
AG1-487	Fast lane / TC1	Gilbert 230 kv		NJ	Hunterdon	Active	JCPL	20	20	20	Solar; Storage	Yes	
AG1-511	Fast lane / TC1	Kittatiny 230 kv		NJ	Warren	Active	JCPL	50	50	30	Solar; Storage	Yes	
AG2-016	TC2	Oyster Creek-Whitings 34.5 kv		NJ	Ocean	Active	JCPL	19.8	19.8	8.316	Solar	Yes	
AG2-032	TC2	Mannington 230 kv		NJ	Salem	Active	AEC	60	60	40	Solar; Storage	Yes	
AG2-035	TC2	Fenwick Creek 69 kv		NJ	Salem	Active	AEC	71	33	22	Solar	Yes	
AG2-036	TC2	Mantua 12 kv		NJ	Gloucester	Active	AEC	10	10	5.1	Solar	Yes	
AG2-177	TC2	Limecrest-Woodruff's Gap 34.5 kv		NJ	Sussex	Active	JCPL	8	8	3.36	Solar	Yes	
AG2-189	TC2	Washington-Pequest River 34.5 kv		NJ	Warren	Active	JCPL	19.8	19.8	8.316	Solar	Yes	
AG2-228	TC2	Pequest River-Washington 34.5 kv		NJ	Warren	Active	JCPL	11.2	11.2	4.704	Solar	Yes	
AG2-241	TC2	Roadstown 69 kv		NJ	Cumberland	Active	AEC	47	47	31.333	Solar	Yes	
AG2-254	TC2	New Lisbon 12.47 kv		NJ	Burlington	Active	JCPL	4	4	1.68	Solar	Yes	
AG2-255	TC2	South Hampton 13 kv		NJ	Burlington	Active	PSEG	4	4	1.68	Solar	Yes	
AG2-297	TC2	Cumberland 230 kv		NJ	Cumberland	Active	AEC	19	19	11.4	Solar	Yes	
AG2-421	TC2	High Street 12.47 kv		NJ	Cumberland	Active	AEC	1	1	0	Solar	Yes	
AG2-530	TC2	Wilmington Mills - Woodstown 69 kv		NJ	Salem	Active	AEC	19.975	19.975	10	Solar	Yes	
AG2-588	TC2	Kittatiny - Blairstown 34.5 kv		NJ	Warren	Active	JCPL	20	20	12	Solar	Yes	
AG2-599	TC2	Furnace Brook-Warren 34.5 kv		NJ	Warren	Active	JCPL	19.6	19.6	8.232	Solar	Yes	
AG2-600	TC2	American Can-BASF 34.5 kv		NJ	Warren	Active	JCPL	19.6	19.6	8.232	Solar	Yes	
AG2-616	TC2	Churchtown - Upper Pittsgrove 138 kv		NJ	Salem	Active	AEC	50	50	32.35	Solar	Yes	
AG2-624	TC2	Pequest River-Furnace Brook Tap 34.5 kv		NJ	Warren	Active	JCPL	19.6	19.6	8.232	Solar	Yes	
AG2-625	TC2	Pequest River-Furnace Brook Tap 34.5 kv II		NJ	Warren	Active	JCPL	19.6	19.6	8.232	Solar	Yes	
AG2-626	TC2	Pequest River-Furnace Brook Tap 34.5 kv III		NJ	Warren	Active	JCPL	12.5	12.5	5.25	Solar	Yes	
AG2-627	TC2	Woodstown-High Street 69 kv		NJ	Gloucester	Active	AEC	60	60	42	Solar; Storage	Yes	
AH1-054	TC2	Upton-Whitings 34.5 kv		NJ	Ocean	Active	JCPL	8.25	8.25	3.465	Solar	Yes	
AH1-067	TC2	Minotola 12.47 kv		NJ	Gloucester	Active	AEC	8.5	8.5	4.2	Solar	Yes	
AH1-068	TC2	Williamstown 12.47 kv		NJ	Gloucester	Active	AEC	12	12	5.9	Solar	Yes	
AH1-077	TC2	TBD 34.5 kv		NJ	Burlington	Active	AEC	3	3	1.24	Solar	Yes	
AH1-257	TC2	Broadway - RichLine Hill Solar 34.5 kv		NJ	Warren	Active	JCPL	19.25	19.25	8.085	Solar	Yes	
AH1-258	TC2	Belford - Keansburg 34.5 kv		NJ	Monmouth	Active	AEC	19.25	19.25	8.085	Solar	Yes	
AH1-265	TC2	TBD 69kv		NJ	Camden	Active	JCPL	29.4	29.4	12.35	Solar	Yes	
AH1-274	TC2	Monroe - North Central 69kv		NJ	Gloucester	Active	AEC	16.7	16.7	7.014	Solar	Yes	
AH1-290	TC2	BASF - Washburn Solar 34.5 kv		NJ	Warren	Active	JCPL	19.25	19.25	8.085	Solar	Yes	
AH1-334	TC2	Manchester - Whitings 34.5 kv		NJ	Ocean	Active	JCPL	19.25	19.25	8.085	Solar	Yes	
AH1-335	TC2	Furnace Brook Tap - Warren County Resource Recovery 34.5 kv		NJ	Warren	Active	JCPL	19.25	19.25	8.085	Solar	Yes	
AH1-641	TC2	Churchtown - Upper Pittsgrove 138kv		NJ	Salem	Active	AEC	65	15	15	Solar	Yes	
AH2-109	New process	TBD 22.47kv		NJ	Unknown	Active	AEC	1.5	1.5	0	Solar	Yes	
AH2-412	New process	TBD 69kv		NJ	Cumberland	Active	AEC	7.35	7.35	3.09	Solar	Yes	
A11-033	New process	Somerville 26 kv		NJ	Somerset	Active	PSEG	8	8	3.8	Solar	Yes	
A11-118	New process	Pequest river - Gilbert 115 kv		NJ	Warren	Active	JCPL	37.6	37.6	15.792	Solar	Yes	
A11-120	New process	Pequest River - Gilbert 115 kv		NJ	Warren	Active	JCPL	51.6	51.6	21.672	Solar	Yes	
A11-122	New process	Sparta LF Solar 34.5 kv		NJ	Sussex	Active	JCPL	5.85	5.85	2.457	Solar	Yes	
A11-137	New process	Greystone - Portland 230 kv		NJ	Warren	Active	JCPL	155	155	65.1	Solar	Yes	
A12-202	New process	Bennett - Farmingdale 34.5 kv		NJ	Monmouth	Active	JCPL	2	0	1.2	Solar	Yes	
A12-203	New process	Upper Pittsgrove 138 kv		NJ	Salem	Active	AEC	2	0	1	Solar	Yes	
A12-204	New process	Brokaw 345kv (CIR Increase)		NJ	Gloucester	Active	PSEG	3	0	1.55	Solar	Yes	
A12-205	New process	Branchville - Sussex 34.5 kv		NJ	Sussex	Active	JCPL	10	0	5.9	Solar	Yes	
A12-206	New process	Cardiff 12 kv		NJ	Atlantic	Active	AEC	2.6	0	1.57	Solar	Yes	
A12-208	New process	Hawks 12.5 kv		NJ	Hunterdon	Active	JCPL	3	0	1.55	Solar	Yes	
A12-209	New process	Burlington 26kv (CIR Increase)		NJ	Burlington	Active	PSEG	7	0	3.05	Solar	Yes	
A12-210	New process	Ringoes-US Bronze 34kv		NJ	Hunterdon	Active	JCPL	10	0	4.6	Solar	Yes	
A12-212	New process	Manitou-Pleasant Plains 34.5 kv		NJ	Ocean	Active	JCPL	20	0	10.8	Solar	Yes	
A12-213	New process	Allenwood-Larrabee 2.34.5 kv		NJ	Monmouth	Active	JCPL	7	0	3.05	Solar	Yes	
A12-378	New process	Merrill Creek 115 kv II		NJ	Warren	Active	JCPL	70	0	28	Solar	Yes	
A12-385	New process	South Millville - Newport 69 kv		NJ	Cumberland	Active	AEC	59.7	0	23.57	Solar	Yes	
A12-387	New process	Carlis Corner - Sherman Ave 69 kv		NJ	Cumberland	Active	AEC	49.7	0	19.8	Solar	Yes	
A12-437	New process	Glen Gardner - Washington 34.5 kv		NJ	Warren	Active	JCPL	20	20	8.4	Solar	Yes	
AC1-010	Current process	Gloucester 26kv	National Park NJ	NJ	Gloucester	Engineering and Procurement	PSEG	6	6	2.2	Solar	Yes	
AD2-135	Current process	Williamstown 12kv	Monroe-Sickleville Road LF Solar	NJ	Gloucester	Engineering and Procurement	AEC	1.62	1.62	0.6	Solar	Yes	
AE1-179	Fast lane / TC1	South Millville-Newport 69 kv	Buckshutem Solar I	NJ	Cumberland	Engineering and Procurement	AEC	59.7	59.7	35	Solar	No	Already Awarded under CSI
AE1-229	Fast lane / TC1	Deepwater-Upper Pittsgrove 138 kv	Pilesgrove Solar Project	NJ	Salem	Engineering and Procurement	AEC	149.3	149.3	89	Solar	Yes	
AE2-334	Fast lane / TC1	Clayton-Williamstown 69 kv	Gloucester Solar I	NJ	Gloucester	Engineering and Procurement	AEC	44	44	26.4	Solar	Yes	
AF1-320	Fast lane / TC1	Merrill Creek 115 kv	Harmony Plains Solar and Storage Facility	NJ	Warren	Engineering and Procurement	JCPL	70	70	42	Solar; Storage	No	Already Awarded under CSI
AF2-192	Fast lane / TC1	Frenchtown Solar-West Flemington 34.5 kv	Barbertown Solar	NJ	Hunterdon	Engineering and Procurement	JCPL	7	7	3.4	Solar	Yes	
AF2-354	Fast lane / TC1	Washington 34.5 kv II	Washington Solar PH II	NJ	Warren	Engineering and Procurement	JCPL	19.8	11	4.62	Solar	Yes	
AG1-191	Fast lane / TC1	Chester-Pohatcong Mountain 34.5 kv	South Combe	NJ	Morris	Engineering and Procurement	JCPL	15.4	15.4	6.5	Solar	Yes	
AG1-223	Fast lane / TC1	Larrabee-Allaire 34.5 kv	Monmouth Solar I	NJ	Monmouth	Engineering and Procurement	JCPL	15.4	15.4	6.47	Solar	Yes	
AG1-495	Fast lane / TC1	Gilbert-Rocktown 34.5 kv	Ridge Road Solar Farm	NJ	Hunterdon	Engineering and Procurement	JCPL	19.8	19.8	8.316	Solar	Yes	
AE1-240	Fast lane / TC1	Carlis Corner-Sherman Avenue 69 kv	Nabb Solar Project	NJ	Cumberland	Suspended	AEC	49.7	49.7	29	Solar	No	Already Awarded under CSI
AF2-254	Fast lane / TC1	Cookstown-New Lisbon 34.5 kv	NJ Land Phase II	NJ	Burlington	Suspended	JCPL	10	10	4.2	Solar	Yes	