

December 12, 2024

VIA ELECTRONIC MAIL ONLY

Sherri L. Golden, Secretary
New Jersey Board of Public Utilities
44 South Clinton Ave., 1st Floor
Trenton, NJ 08625
board.secretary@bpu.nj.gov

Re: In the Matter of the Community Solar Energy Program
Docket No. QO22030153

Dear Secretary Golden:

On behalf of Jersey Central Power & Light Company (“JCP&L” or the “Company”), please accept this letter as JCP&L’s responses to questions raised in a notice issued by the New Jersey Board of Public Utilities (“Board” or “BPU”) staff (“Staff”) concerning the above referenced matter¹. The Company appreciates Staff’s interest in stakeholder feedback on the Community Solar Energy Program (“CSEP”) for its “one-year checkup”.

JCP&L focuses only on question #7 in the Notice, which asks how “the interconnection process [has] influenced project registration and advancement to construction”². To highlight the importance of interconnection applications and queues to the success of the CSEP, the Company refers back to its comments³ made regarding the proposed rule changes published in the June 3, 2024 New Jersey Register (“Proposed Rule”).

The Company’s prior comments noted that the Proposed Rule includes a few new provisions, such as those found in subparagraph (o)3.ii. of Proposed Rule 14:8-5.5, that set timelines for interconnection applicant response or action. The Company had previously encouraged such applicant timelines to be included throughout the Proposed Rule because ensuring efficient and timely movement of non-responsive applicants out of Electric Distribution Companies’ (“EDC”) queues will make the process fairer for other applicants in queue. However, the Company noted that, unfortunately, far more is needed than what was included in the Proposed Rule to ensure fair treatment of all applicants in EDC application queues and reduction of “queue-

¹ In the Matter of Community Solar Energy Program, BPU Docket No. QO22030153, Notice dated November 21, 2024 (“Notice”).

² Id.

³ In the Matter of Modernizing New Jersey's Interconnection Rules, Processes, and Metrics, BPU Docket No. QO21010085, Comments of JCP&L regarding proposed rule changes (dated August 2, 2024) (“prior comments”).

Sherri L. Golden, Secretary
December 12, 2024
Page 2

clogging” by non-responsive applicants. The Company gave examples of additional timelines that could be included in the Proposed Rule (e.g., that an approval to install should be time-limited, and e.g., for two years with a one-year extension). Another example provided that an applicant should not be allowed to “sit” indefinitely on a completed study without canceling or moving forward. In essence, the Company argued that the establishment of timelines is critical to ensure fair treatment for all and this compliance burden should fall on applicants as much as they are proposed to apply to the EDCs in the Proposed Rule. While this argument was made with respect to all distributed energy resource interconnections, it is equally critical for CSEP interconnections, particularly given the volume of applications under the CSEP, as impacted by P.L. 2023, c. 200 (“Community Solar Expansion Act”), which further increased the goals of the New Jersey’s Community Solar Program. The Company encourages Staff to consider JCP&L’s suggestions for the interconnection queue as found in its prior comments on the Proposed Rule as Staff engages in its “one-year checkup” on the CSEP.

JCP&L appreciates the productive working relationship it has had with Staff throughout the implementation of the CSEP, and it further thanks Staff for seeking its input on this matter. Please do not hesitate to reach out if you have any questions.

Respectfully submitted,



Andrew D. Hendry
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Jersey Central Power & Light Company