



Monday, December 16, 2024

via email: board.secretary@bpu.nj.gov

Ms. Sherri Golden
Secretary of the Board
State of New Jersey, Board of Public Utilities
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 08625-0350

Re: BPU Docket No. QO22030153

Dear Secretary Golden:

NJR Clean Energy Ventures Corporation (“NJRCEV”) appreciates the opportunity to submit the following comments regarding the Community Solar Energy Program (CSEP). NJRCEV is a leader in New Jersey’s clean energy markets, having invested more than \$1.2 billion in over 475 MW of solar projects across the state since 2010. These projects, which make up approximately 10% of New Jersey’s installed solar capacity, have created more than 1,000 local jobs, supported energy cost savings for our customers, and reduced 330,000 tons of greenhouse gas emissions. We remain committed to advancing clean energy initiatives and appreciate the chance to contribute to the continued development of solar in the state.

As it pertains to the CSEP, NJRCEV feels the overall effectiveness and efficiency of the program could be improved by transitioning to a utility procurement model, similar to Connecticut’s Shared Clean Energy Facility (SCEF) Program.

The SCEF program is a competitive procurement program supporting new clean power generation in Connecticut, with selected projects entering into 20-year tariff agreements with the EDC in which they are located. This model allows for clean energy benefits to flow directly to participating customers via bill credits, without the inefficiencies associated with individual customer enrollment. Through SCEF, customers who would not otherwise be able to participate in solar, including low- and moderate-income (LMI) customers, benefit directly from a clean energy project’s power production. As SCEF projects become operational, customers are selected for subscribership in an “opt-out” style enrollment. These subscribers receive a monthly bill credit for a portion of the electricity generated by the project for up to 20 years.

Transitioning the CSEP to a similar utility procurement model would allow for the more efficient delivery of solar benefits to customers. By allowing utilities to directly procure solar generation that feeds into the distribution grid, the state can foster a more efficient deployment of community solar, while cutting the administrative cost of third-party customer acquisition.

We appreciate the opportunity to provide these comments and look forward to collaborating with Staff and stakeholders to ensure a successful program that maximizes the state's clean energy potential while minimizing costs for all ratepayers.

Respectfully,

Steve Osborne, Jr.
Sr. Corporate Strategy Analyst

cc: Larry Barth, Managing Director – Corporate Strategy
Robert Pohlman, Vice President – Clean Energy Ventures and Corporate Strategy
Mark Valori, Vice President – Clean Energy Ventures
Garrett Lerner, Managing Director – Development and Finance