



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. QO21101186

Dear Secretary Golden:

NJR Clean Energy Ventures Corporation (“NJRCEV”) appreciates the opportunity to submit the following comments regarding the Competitive Solicitation Incentive (CSI) Request for Information released on December 2, 2024. 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 are committed to advancing clean energy initiatives and appreciate the chance to contribute to the continued development of renewable energy in the state.

We respectfully submit the following responses to the specific questions raised under the solicitation process and project maturity requirements.

1. Preparation for Changes in ITC

NJRCEV strongly believes that ensuring program efficiency and developer confidence should remain a top priority for the Board.

Staff has asked whether the program should include mechanisms to address potential changes to the Federal Investment Tax Credit (ITC). Rather than attempting to directly adjust program structures to compensate for uncertain federal changes, we recommend that Staff focus its efforts on accelerating the efficiency of solar program rollouts. Providing programmatic line of sight will improve project owners’ chances of capturing the benefits of the Inflation Reduction Act (IRA) ahead of any potential changes that may come with a new federal administration in 2025. Should IRA rollbacks or other substantive changes to the ITC come to fruition in 2025, Staff and stakeholders can focus efforts at that time to respond and adapt the CSI (and other) programs to these new realities.

Providing clarity, predictability and efficiency in the program structure and awards will be more beneficial to solar investors than speculating on future federal policy outcomes.

2. PJM Interconnection Challenges in Solicitation #3

2a. Treatment of Transition Cycle #2 Projects

Unless the Board anticipates that the upcoming solicitation will be the final round of the CSI Program, Transition Cycle #2 projects can participate in future solicitations closer to their anticipated interconnection dates. Allocating limited capacity to these projects in the third solicitation risks displacing more advanced projects that can deliver emissions reduction benefits sooner.

2c. Extensions for Commercial Operation

The current CSI rule allowing projects 36 months to reach commercial operation, with one six-month extension, provides a reasonable framework. While additional flexibility may be warranted for projects directly impacted by PJM or Electric Distribution Company (EDC) delays, blanket extensions risk undermining the program's overall efficiency. We recommend that any deadline adjustments be tied directly to documented delays stemming from external factors, such as PJM or the connecting utility to ensure that only projects that are impacted by events out of their control receive accommodations.

NJRCEV appreciates the opportunity to provide input on these critical issues and looks forward to working with Staff and stakeholders to ensure the continued success of the CSI Program. Thank you for your consideration.

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