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New Jersey Board of Public Utilities  
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December 18, 2024

**RE: DOCKET NO. QO24070554  
IN THE MATTER OF THE NEW JERSEY ENERGY STORAGE INCENTIVE PROGRAM**

The Coalition for Community Solar Access respectfully submits these comments for the Board of Public Utilities (“BPU”) consideration in the implementation of the energy storage targets set forth by the 2018 Clean Energy Act. CCSA appreciates the opportunity to provide comments on the 2024 Straw Proposal (“Straw Proposal”) for the New Jersey Storage Incentive Program (“SIP”).

CCSA is a national, business-led trade organization, composed of over 100 member companies, that works to expand access to clean, local, affordable energy nationwide through the development of robust community solar programs. Its members range from pure-play project developers to companies focused on customer outreach and engagement.

The current 2024 Straw Proposal notes that “...this Straw will focus on incentivizing stand-alone Grid Supply energy storage projects as well as solar-plus-storage projects that are ineligible to receive storage incentives from the SuSI Program.” However, it is unclear what path the Board has contemplated for deploying front-of-the-meter distributed energy storage on community solar project sites in the State. Our members who operate in New Jersey can do this at scale and affordably. New Jersey’s community solar program is robust and successful and could serve as an even more significant grid resource with the deployment of energy storage. Further, the deployment of front-of-the-meter distributed storage can be accelerated by co-locating with existing community solar, leveraging existing infrastructure and interconnection rights.

CCSA believes that further improvements to the current energy storage incentive program are needed in order to provide community solar projects participating in the State’s community solar program (Pilot or Permanent) an ability and an incentive to incorporate front-of-the-meter storage on their project sites. Specifically, CCSA supports the comments and proposal submitted by the Solar Energy Industries Association and New Jersey Solar Energy Coalition, to design a program for front-of-the-meter distributed storage that uses grid-services (and a bridge payment) to inform its incentive structure. The current proposed distributed storage program only envisions behind-the-meter resources, despite the fact that front-of-the-meter resources such as community solar provide value to the electric distribution companies rather than the



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wholesale market. There is merit to incorporating front-of-the-meter projects such as community solar projects. Forcing the community solar projects participating in the SuSI program to engage in the competitive solicitation for grid supply is not appropriate. We recommend maintaining the synergies of the program design by enabling front-of-the-meter distributed storage to participate in the fittingly titled Distributed Energy Storage program.

CCSA also supports comments filed by several stakeholders recommending a review of the incentives outlined for the distributed energy storage program. It is our member's experience that the deployment of energy storage resources greater than 500 kilowatts requires more funding than outlined in the 2024 Straw Proposal. A survey of comparable programs in markets that are similar to New Jersey suggest that programs start at a much higher compensation level.

As with front-of-the-meter distributed solar, front-of-the-meter distributed storage represents a highly scalable tool for meeting the state's requirements while providing real benefits to the grid and its ratepayers.<sup>1</sup> It would be a missed opportunity for New Jersey, the most densely populated state in the country<sup>2</sup>, to not more fully embrace this distributed energy resource.

Respectfully submitted,

Charlie Coggeshall /s/  
Mid-Atlantic Regional Director  
Coalition for Community Solar Access

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<sup>1</sup> Vibrant Clean Energy. Why Local Solar for All Costs Less. (2020). Found here: [https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs\\_TR\\_Final.pdf](https://www.vibrantcleanenergy.com/wp-content/uploads/2020/12/WhyDERs_TR_Final.pdf)

<sup>2</sup> World Population Review. Does not include Washington, DC. Data found here: <https://worldpopulationreview.com/state-rankings/state-densities>