



January 30, 2025

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New Jersey Board of Public Utilities  
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Dear Ms. Secretary:

The comments on the BPU's Dual-Use Solar Energy Pilot Program Rules contained herein are made jointly by MASCEC, a long time workforce development nonprofit, which has conducted various agriculture programs, and Tatleaux Solar Group, a fully integrated solar development and construction, workforce development, and subscriber management firm focused on the community level.

First, we commend and congratulate the NJ BPU for establishing the first of its kind in the US program for allowing solar on farmland while not reducing crop production and farm income to farm owners and the state's economy. MASCEC-Tatleaux is honored to participate in this trail blazing program.

*BPU: The intention of the Pilot Program is to encourage the development of dual-use solar facilities and the creation of a new segment of the solar industry in New Jersey that is compatible with the State's rich agricultural heritage. Dual-use solar can provide farmers with an additional stream of revenue, contributing to farm financial viability and allowing for continued agricultural or horticultural production of land while increasing the production of clean energy. These projects will also create a substantial number of green economy jobs and further the State's efforts toward achieving its renewable energy goals.*

**MASCEC-Tatleaux:** Mid Atlantic States Career and Education Center (MASCEC) and Tatleaux Solar Group (Tatleaux) are full partners in the New Options Farms® Agrivoltaic Centers, a groundbreaking agrivoltaic concept formulated by MASCEC and its cofounder Benjamin Wood, professor of agriculture at Cornell University for over thirty years. MASCEC provides the planning and implementation of the New Options Farms® centers. Tatleaux provides the necessary solar facilities and electricity. New Options Farms® combines much higher productivity greenhouse farming powered for free by clean solar electricity projects. The New Options Farms® centers also integrate both greenhouse farming training for disabled workers with solar installer training programs. Tatleaux provides the excess electricity from the solar project beyond powering greenhouse operations to local residents at the largest discounts in the industry. From greenhouse crop production that generate significant increases to farm owner income and farm production, to clean solar energy, to training and hiring programs, to its equity philosophy on residential electricity costs, New Options Farms® agrivoltaics is geared toward

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providing direct, significant benefits at the local community level.

Note - Because of high financial barriers to greenhouse agrivoltaics the concept is in its infancy in Europe and Asia and has yet to be introduced in the United States. New Options Farms believes it has overcome the high financial barriers by the terms of the MASCEC-Tatleaux partnership which includes a large financial investment by Tatleaux in the greenhouses and farming operations largely funded by its solar projects at the Centers. MASCEC and Tatleaux have introduced and discussed the New Options Farms® model with various New Jersey agriculture and public officials. The concept still needs to be studied by the BPU and the NJ agriculture community. MASCEC and Tatleaux believe strongly that the BPU's Dual Use program is ideal for the continued study, and hopefully acceptance, of the New Options Farms® model and concepts. Tatleaux will be completing Expressions of Interest for a few New Options Farm agrivoltaic centers.

*BPU: These criteria are reflected in the proposed amendments and new rules with the additional considerations for project location in an “overburdened community” or “underserved community” and a three-year plan for the farming operation.*

MASCEC-Tatleaux: New Options Farms® is designed to provide its programs to low-to-moderate income communities. Its current centers are in the three lowest median income counties in New Jersey. We assume this meets the BPU's additional consideration for project locations in overburdened or underserved communities.

*BPU: The Board will also consider diverse types of agricultural and horticultural production, as well as a variety of project sizes.*

MASCEC-Tatleaux: We fully support this new rule. New Options Farms® has purposely involved a diversity of projects locations, size, and crops grown for data gathering purposes in the spirit of the Dual Use Pilot Program.

*BPU: A subset of the ADI Program, the Community Solar Energy Program (CSEP), does not provide incentives for ground-mounted solar projects, projects located on farmland or open space, or any type of land currently envisioned as suitable locations for agrivoltaic projects. Thus, a Dual-Use pilot project will not be allowed to participate in the CSEP.*

MASCEC-Tatleaux: We have had no plans and will not submit New Options Farm® Agrivoltaic Centers solar projects to the CSEP. We will be submitting these projects to the Dual Use Program only. Tatleaux is a participant in the CSEP and follows its siting rules. Please clarify the Dual Use Program's rules so that selling excess electricity beyond greenhouse needs can be to local residents. Tatleaux is a community solar firm. Besides our net meter projects for public entity facilities, Tatleaux only sells electricity to residents, and we have the highest discounts in the industry for community solar residential customers. Selling to residential customers is much more difficult than selling back the electricity to the grid or to buildings.



*BPU: In order to do so in a non-biased and scientific manner, the proposed amendments and new rules require that each approved project generate paired agricultural production data from an agrivoltaic array-covered area and a non-array-covered area, or research control area, from the same farm. Both members of the pair will have the same crop and will be farmed by the same operator using the same methods.*

**MASCEC-Tatleaux:** Note that some of MASCEC-Tatleaux New Options Farm centers are on farmland that has not been farmed in the last couple of years due to unattractive farming economics and the lack of labor a common farming problem in NJ and the U.S. Because the New Options Farm® Agrivoltaics is a new concept, by definition, our Centers will not have the same farm operator or methods. Moreover, for purposes of data gathering, our Centers provide diversity of crops, which is not the case with the former farming use of the New Options Farm® Agrivoltaics Center land we use. Thus, we believe that especially for a Pilot Program, this rule should be waived. We will, however, be using data from previous traditional crop and farming methods as comparative data to greenhouse farming data.

*BPU: Specifically, the Board is proposing to review potential project locations for their proximity to overburdened communities and underserved communities, as well as a project's plan for outreach and engagement with the potentially impacted communities.*

**MASCEC-Tatleaux:** is highly supportive of this clause. Farming counties and towns are among the most overburdened and underserved in the states. MASCEC-Tatleaux New Options Farm® Agrivoltaics Centers are intentionally located in these communities and our electricity subscriber programs are geared towards providing much cheaper electricity to these communities.