

Renewable Properties, LLC

44 Montgomery Street, Suite 3150

San Francisco, CA 94104

www.renewprop.com

New Jersey Board of Public Utilities

44 S Clinton Ave

Trenton, NJ 08625

January 31, 2025

RE: Docket No. QX24080597 – Dual-Use Solar Energy Pilot Program Proposal No. PRN 2024-137

I. Introduction

Renewable Properties, LLC respectfully submits the following comments in response to Proposal No. PRN 2024-137 (Proposal), concerning the Dual-Use Solar Energy Pilot Program (Pilot Program), as filed by Staff of the New Jersey Board of Public Utilities (Board) (Staff) in Docket No. QX24080597.

We sincerely appreciate Staff's time and effort in developing this program and for the guidance provided thus far. As our comments pertain specifically to EOI submission requirements developed in the Proposal, we respectfully request that Staff expedite their response so applicants have the necessary information ahead of the February 14, 2025 deadline.

Please contact us if you have any questions about this submission.

Renewable Properties Point of Contact:

Tyler Orcutt

Community Solar Manager

Tyler@renewprop.com**II. Comments regarding research plan requirements**

Per PRN 2024-137, the Pilot Program includes baseline requirements for conducting mandatory research studies applicable to all projects. Further, the Proposed Rules states that the Board entered into a grant agreement with RAP to serve as the primary designer and organizer of research studies. Renewable Properties has also reviewed the subsequent filing in Docket No. QO23090679 Notice of Solar Incentive Availability (NOIA), the Expression of Interest (EOI) Form, and Guidance Document regarding research plans.



While these filings offer more detail on research expectations, additional guidance is needed to ensure that applicants fully grasp program requirements and can effectively present project progress during the application review process. Specifically, Staff should address the following questions when providing guidance:

1. Applicants are expected to provide detailed research plans in the EOI, yet RAP will ultimately design the studies. Since RAP can be contracted to serve as a research partner only after the Board approves projects for the Pilot Program, how should applicants present a research plan that meets the requirements without excessive speculation?
 - a. Does this indicate that an early partnership with a non-Board appointed entity at cost to the developer will receive higher preference in EOI evaluation?
2. Can the Board provide any indication of what data will be required regarding non-Board appointed entities for submission with the final application? Are there specific requirements we can address in our EOI if we choose to pursue that route? We understand that the Board has indicated that this information will be provided after prequalification and before final applications, but overarching guidance is appreciated as we connect with institutions while developing our EOI research plans.
3. We understand that the research items in A–M of Appendix B of the Order launching the Pilot Program are the project owner’s responsibility to execute. However, is it within the scope of RAP’s contract with the Board to help develop a plan for these items when designing the research plan?

III. Comments regarding adder calculation

The Proposed Rules specify that applicants will provide an estimated Dual-Use incentive adder required to cover incremental costs. Please clarify whether the prequalification estimate is considered binding if a project advances to the full application stage, as further refinements to project details are anticipated over time.

IV. Comments regarding underserved communities

The link to the U.S. Department of Energy’s Low-income Energy Affordability Data (“LEAD”) tool provided by Staff is broken. Please provide guidance on an alternative method to identify underserved communities.