



STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

CLEAN ENERGY

IN THE MATTER OF THE IMPLEMENTATION OF)	ORDER
<u>L.</u> 2012, <u>C.</u> 24, THE SOLAR ACT OF 2012)	
)	DOCKET NO. EO12090832V
IN THE MATTER OF THE SOLAR TRANSITION)	
PURSUANT TO <u>P.L.</u> 2018, <u>C.</u> 17 – APPLICATION FOR)	
CERTIFICATION OF SOLAR FACILITY AS ELIGIBLE)	DOCKET NO. QO19010068
FOR TRECS PURSUANT TO SUBSECTION (T) OF)	
THE SOLAR ACT OF 2012)	
)	
SOLAR LANDSCAPE)	
OWENS ILLINOIS INCORPORATED)	DOCKET NO. QO22030132

Parties of Record:

Brian O. Lipman, Esq., Director, New Jersey Division of Rate Counsel
Corey Gross, Managing Partner, Solar Landscape

BY THE BOARD:1

This Order concerns an application by Solar Landscape (“Applicant”) for certification pursuant to L. 2012, c. 24 (“Solar Act”), codified at N.J.S.A. 48:3-87(t) [“Subsection (t)”]. Solar Landscape seeks certification for eligibility to generate Transition Renewable Energy Certificates (“TRECs”) for the proposed solar electric generation facility to be located at the former Owens-Illinois facility, Block 77, Lots 4, 5 and 7, 450 North Laurel Street, in Bridgeton, Cumberland County, New Jersey (“Project”). Applicant alleges that the proposed site is a “brownfield” as that term is defined in the Solar Act.

BACKGROUND

On July 23, 2012, the Solar Act was signed into law. The Solar Act amended certain aspects of the statute governing generation, interconnection, and financing of renewable energy. Among other actions, the Solar Act required the New Jersey Board of Public Utilities (“Board”) to conduct proceedings to establish new standards and to develop new programs to implement the statute’s

1 President Fiordaliso has recused himself from voting on this matter.

directives. By Order dated October 10, 2012, the Board directed Board Staff (“Staff”) to initiate proceedings and convene a public stakeholder process to fulfill the directives of the Solar Act.²

The Solar Act – specifically, Subsection (t) – provides that:

No more than 180 days after [July 23, 2012], the board shall, in consultation with the Department of Environmental Protection and the New Jersey Economic Development Authority, and, after notice and opportunity for public comment and public hearing, complete a proceeding to establish a program to provide SRECs to owners of solar electric power generation facility projects certified by the board, in consultation with the Department of Environmental Protection, as being located on a brownfield, on an area of historic fill or on a properly closed sanitary landfill facility. . . . Projects certified under this subsection shall be considered “connected to the distribution system” [and] shall not require such designation by the board[.]

[N.J.S.A. 48:3-87(t).]

The Solar Act defines the terms “brownfield,” “area of historic fill,” and “properly closed sanitary landfill facility.” A “brownfield” is “any former or current commercial or industrial site that is currently vacant or underutilized and on which there has been, or there is suspected to have been, a discharge of a contaminant.” N.J.S.A. 48:3-51. “Historic fill” is “generally large volumes of non-indigenous material, no matter what date they were placed on the site, used to raise the topographic elevation of a site” Id. A “properly closed sanitary landfill facility” means “a sanitary landfill facility, or a portion of a sanitary landfill facility, for which performance is complete with respect to all activities associated with the design, installation, purchase, or construction of all measures, structures, or equipment required by the Department of Environmental Protection” Id.

Toward implementing the October 10, 2012 Order, Staff met with staff of the New Jersey Economic Development Authority and the New Jersey Department of Environmental Protection (“NJDEP” or “Department”). On November 9, 2012, consistent with the requirements of the Solar Act, the Board held a public hearing presided over by then-Commissioner Joseph L. Fiordaliso. In addition, the public was invited to submit written comments through November 23, 2012.

In an Order dated January 24, 2013, the Board approved Staff’s proposed process for certifying solar generation projects as being located on brownfields, areas of historic fill, and properly closed

² In re the Implementation of L. 2012, C. 24, The Solar Act of 2012; I/M/O the Implementation of L.2012, C.24, N.J.S.A 48:3-87(d)(3)(b) – A Proceeding to Investigate Approaches to Mitigate Solar Development Volatility; In re the Implementation of L.2012, C.24, N.J.S.A 48:3-87(e)(4) – Net Metering Aggregation Standards; In re the Implementation of L.2012, C.24, N.J.S.A 48:3-87(Q), (R) and (S) – Proceedings to Establish the Processes for Designating Certain Grid-Supply Projects as Connected to the Distribution System; In re the Implementation of L.2012, C.24, N.J.S.A 48:3-87(T) – A Proceeding to Establish a Program to Provide Solar Renewable Energy Certificates to Certified Brownfield, Historic Fill and Landfill Facilities; and In re the Implementation of L.2012, C.24, N.J.S.A 48:3-87(W) – A Proceeding to Consider the Need for a Program to Provide a Financial Incentive to Supplement Solar Renewable Energy Certificates for Net Metered Projects Greater than Three Megawatts; 2012 N.J. PUC LEXIS 286 (Oct. 10, 2012).

sanitary landfill facilities.³ The certification process for projects seeking approval pursuant to Subsection (t) provides three (3) potential recommendations from Staff to the Board: full certification, conditional certification, or denial of certification. Conditional certification may be granted for projects located on sites which NJDEP has determined require further remedial action or, in the case of properly closed sanitary landfill facilities, additional protective measures, and full certification may be granted for projects located on sites for which NJDEP has determined no further remedial or protective action is necessary. The process incorporates the expertise of the NJDEP to confirm a potential project's land use classification for eligibility and to account for the state of remediation of the project site.⁴

The January 24, 2013 Order states that certification would be limited to those areas delineated by NJDEP. In compliance with this directive, applicants are required to delineate the precise section(s) of the location where the solar facility is proposed to be sited, and NJDEP reviews this material in making its recommendation.

The Board found that an application for solar projects located on brownfields, areas of historic fill, or properly closed sanitary landfill facilities was necessary to initiate the certification process and directed Staff to work with NJDEP to develop an application. Id. at 33.

On May 23, 2018, Governor Murphy signed L. 2018, c. 17, codified at N.J.S.A. 48:3-51 to -87 into law ("Clean Energy Act" or "CEA" or "Act"), effective immediately. The CEA effected many changes to the legal and regulatory framework for solar development, including directing the closure of the Solar Renewable Energy Certificate ("SREC") program by no later than June 2021, reducing the SREC term or "qualification life" to 10 years, and imposing a cap on the cost to ratepayers of certain Class I renewable energy requirements.

The CEA mandated that the Board close the SREC Registration Program ("SRP") once it determined that 5.1% of the kilowatt-hours sold in the State had been generated by solar electric power generators connected to the distribution system ("5.1% Milestone") or, in the alternative, by no later than June 2021. On December 18, 2018, the Board approved the adoption of rule amendments to close the SREC market to new applications upon attainment of the 5.1% Milestone. The new rules took effect upon publication in the New Jersey Register on January 22, 2019.⁵ Pursuant to these rules, the Board determined that the 5.1% Milestone would be reached prior to May 2020 and closed the SRP on April 30, 2020.

On December 6, 2019, the Board established a Transition Incentive ("TI") Program to provide a bridge between the legacy SREC program and a Successor Incentive program in an orderly and efficient manner.⁶ The TI Program provides eligible projects with TRECs for each megawatt hour of electricity produced. Incentives are tailored to specific project types by the use of factors, which are applied to a base incentive rate to provide a particular project type with the full incentive

³ In re the Implementation of L. 2012, c. 24, The Solar Act of 2012; I/M/O the Implementation of L.2012, c.24, N.J.S.A 48:3-87(T) – A Proceeding to Establish a Program to Provide SRECS to Certified Brownfield, Historic Fill and Landfill Facilities; and In re the Implementation of L.2012, c.24, N.J.S.A 48:3-87(U) – A Proceeding to Establish a Registration Program for Solar Power Generation Facilities, 2013 N.J. PUC LEXIS 27, Order dated January 24, 2013 (January 24, 2013 Order).

⁴ January 24, 2013 Order at 31-33.

⁵ 51 N.J.R. 138(e) (Jan. 22, 2019).

⁶ In re a New Jersey Solar Transition Pursuant to P.L. 2018 c. 17, BPU Docket No. QO19010068, Order dated December 6, 2019 ("December 2019 Order").

amount or a set percentage of that amount depending on the costs and anticipated revenue streams for the project type. Projects certified pursuant to Subsection (t) receive a factor of 1.0 and thus the full amount of the base incentive.

At a Special Agenda Meeting held on April 27, 2020, the Board approved a TI rule proposal⁷ that codified this treatment at N.J.A.C. 14:8-10, which was published on May 18, 2020.⁸ On September 10, 2020, the Board adopted the rule proposal, and the rules became effective on October 5, 2020 when published in the New Jersey Register.⁹ The rule provides that the transition incentive “shall be available to projects that submitted a complete SREC Registration Program registration or a complete Subsection (t) application after October 29, 2018” (emphasis added) but that have not received a Permission to Operate at the time that the 5.1% Milestone is achieved.¹⁰ The rule also incorporates the eligibility requirements enumerated at N.J.S.A. 48:3-87(t) and the Board’s Implementing Orders, and requires developers seeking eligibility for TRECs to use the same application process developed for SREC eligibility.¹¹ Moreover, the TI rules require compliance with all rules and regulations of the SRP at N.J.A.C. 14:8-2.4.¹²

On August 17, 2022, the Board provided the opportunity for extension of the TI deadline to Subsection (t) projects registered in the TI Program or with applications pending review with the NJDEP.¹³ The Board waived its rules and modified prior orders to allow up to a 12-month conditional extension to all Subsection (t) solar projects with current registrations as well as those that receive conditional certification by the Board in the future. The extension is conditioned upon providing required documentation of specific criteria.

Projects certified under Subsection (t) are subject to all of the Board’s SRP and TI rules; the statutory language exempts such projects from the need for further Board designation as “connected to the distribution system” but does not remove any of the Board’s oversight authority. For example, projects seeking TREC eligibility must comply with the TI rules at N.J.A.C. 14:8-10, and applicable Board orders concerning registration with the TI Program.¹⁴ The size and location of the subject project will then be reflected in the public reporting of solar development pipeline data.

⁷ In re a Rulemaking Proceeding to Amend the Renewable Portfolio Standard Rules and Create New Rules Establishing a Transition Incentive Program Pursuant to P.L. 2018, c.17, BPU Docket No. QX20030253 (“TI Rule Proposal”).

⁸ 52 N.J.R. 1048(a) (May 18, 2020).

⁹ 52 N.J.R. 1850(a) (October 5, 2020).

¹⁰ N.J.A.C. 14:8-10.4(a).

¹¹ N.J.A.C. 14:8-10.4(h).

¹² N.J.A.C. 14:8-10.4(i).

¹³ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17, Order Granting an up to 12-Month Extension for Projects Seeking an Incentive Pursuant to Subsection (T) in the Solar Transition Incentive Program BPU Docket No. QO19010068, Order dated August 17, 2022 (“TI Extension Order”).

¹⁴ December 2019 Order at 33.

STAFF RECOMMENDATIONS

Project Description

On August 26, 2021, Staff received the Solar Landscape application for inclusion in the TI Program. Staff transmitted a copy of the Solar Landscape application to the NJDEP for review and advice on March 24, 2022. On September 7, 2022, the NJDEP noticed discrepancies with the block and lot numbers in the application and advised Board Staff. Subsequently Staff advised the Applicant who submitted an updated Form F and Section 2 along with a revised map that identifies the correct Block and Lots on September 9, 2022.

At issue is the request by Solar Landscape that its proposed solar facility, to be located in Bridgeton, New Jersey, be certified as eligible for TRECs pursuant to Subsection (t). Solar Landscape filed an application with supporting documentation to enable a NJDEP determination as to whether 22 acres of the proposed site is a brownfield. NJDEP reviewed the application and supplied an advisory memorandum to Staff on October 17, 2022, on the land use classification and on the remediation status of the proposed site. On the basis of NJDEP’s determination, the information certified by Solar Landscape in its application, and the Subsection (t) process approved in the January 24, 2013 Order, Staff recommends that the Board grant conditional certification, as explained further below.

Solar Landscape/Owens Illinois Incorporated - Docket No. QO22030132

Developer	Docket Number	Project/ Designation Address	Location Town	County	Landfill, Brownfield, or Historic Fill	Array Size (MWdc)	EDC
Solar Landscape	QO22030132	Owens Illinois Incorporated	Block 77, Lots 4, 5, 7 450 North Laurel Street Bridgeton, NJ 08302	Cumberland	Brownfield	8.82	ACE

The NJDEP provided the following description of the site background and findings from a review of the application. The Applicant is proposing a 8.82 MWdc grid supply solar farm at the former Owens-Brockway Glass Container facility, in Bridgeton, Cumberland County, New Jersey (“Property”). The Property presently consists of approximately 20 acres of facility buildings, 30 acres of access roads, paved and unpaved parking areas, and 20 acres of undeveloped land. This does not include approximately 3.7 acres, which was the former location of Warehouse 8 at the southern end of the site, taken by the City of Bridgeton in 2004 to facilitate construction of low-income Hope VI residential housing; construction of the Hope VI residential housing commenced in 2005. The Applicant proposes to construct the solar electric power generation facility on the brownfield portion of the Property, approximately 22 acres, as illustrated in the Area of Concern (“AOC”) site plan of the application. The Property is currently owned by real estate firm Royal Equities.

The Property was historically owned and operated by the Illinois Glass Company, which manufactured glass containers from the late 1800s to the 1930s. Quartzose sands and gravels from the Cohansey River were used as the primary media in the manufacturing process. In the 1930s, ownership of the site was transferred to Owens-Illinois, Inc. (“O-I”), which operated the facility until 1983, when all manufacturing operations ceased at the site. Since 1983, the site has been used solely for warehousing (Warehouse Numbers 4, 5, and 6) for the storage of finished glass and other products that were manufactured elsewhere. Certain manufacturing buildings,

support buildings, and Warehouse No. 9 were demolished in 1999. The site was sold to CD&L Realty in August 2000. In 2004, most of the property underlying Warehouse 8 was taken by the City of Bridgeton to facilitate construction of low-income residential housing associated with the United States Department of Housing and Urban Development's Urban Revitalization Demonstration ("Hope VI") Program. Construction of the Hope VI development, preceded by demolition of most of Warehouse 8, commenced in 2005.

A corporate merger in February 1987 triggered the requirements of the Environmental Cleanup Responsibility Act ("ECRA"), now the Industrial Site Recovery Act ("ISRA"). O-I voluntarily entered into an administrative consent order ("ACO") with the Department in March 1987. Pursuant to the ECRA, O-I completed site characterization, identified multiple AOCs, and undertook site investigation and remediation of applicable areas. At least 28 potential AOCs plus groundwater were initially identified and investigated. Several of the AOCs were specific areas based on historical operations; specific media (groundwater, surface water, sediment and indoor air) or similar. Most of the western portion of the site is underlain by fill material: fragments of glass, brick and cinders, intermixed with sand and gravel.

The NJDEP provided the statutory definition of "brownfield". N.J.S.A. 48:3-51 defines "brownfield" as: "[A]ny former or current commercial or industrial site that is currently vacant or underutilized and on which there has been, or there is suspected to have been, a discharge of a contaminant." All three (3) prongs of the "brownfield" definition must be met for an applicant to qualify for SRECs on a brownfield. The burden is on the applicant to demonstrate that all three (3) prongs have been met. See below:

- a. Former or current commercial or industrial site: The solar development is proposed to be located on an industrial site, which was historically owned and operated by the Cumberland Glass Manufacturing Company and the Illinois Glass Company. The site was used for the manufacturing of glass containers from the late 1800s to the 1930s. A corporate merger in February 1987 triggered the requirements of the ECRA, now the ISRA. This means that operations at the site were considered industrial in nature. The site meets the first part of the definition of a "brownfield."
- b. Vacant or underutilized: This site is currently vacant as noted above and in Cumberland County tax documents. The City of Bridgeton "Master Plan" dated September 2008, included Block 77 as part of the Hope VI Redevelopment Area. Municipalities include sites in Redevelopment Areas that are vacant or underutilized. The site does have warehousing activities, but it would be considered underutilized, thus meeting the second part of the "brownfield" definition.
- c. Discharge of a contaminant at the location of the proposed solar array: This is a known contaminated site that requires remediation, with confirmed soil and ground water contamination. According to the report included in the application, contaminants of concern include petroleum hydrocarbons (gasoline and number 4 fuel oil), chlorinated solvents (PCE and TCE), and metals (arsenic and selenium). The Applicant also provides descriptions of areas of concern that require investigation and cleanup in the AOC Map and documents the presence of soil and sediment contamination (Lot 4.03) in a letter dated November 12, 2021.

The 2016 Remedial Investigation Report included with the application indicates that there are 28 areas of concern throughout the site, including, but not limited to, underground storage tanks, lagoons, drainage culverts and swales, sediment and groundwater. Many

of the AOCs indicated the presence of contaminants over remedial standards. Analytical results of soil samples collected indicate semi-volatile compounds (“SVOC”) exceedances of Non-Residential Soil Remediation Standards (“SRS”) and/or the Department’s default Impact to Groundwater Soil Screening Levels (“IGW SSLs”). SVOC exceedances ranged from 0.28 mg/kg of benzo(a)pyrene to 14 mg/kg of 2- methynaphthalene. The most recent permanent well groundwater monitoring in December 2013 and February 2015 show concentrations of volatile organic compounds, SVOCs, and arsenic above the applicable Groundwater Quality Standards (GWQS, N.J.A.C. 7:9C). Therefore, the site meets the third part of the “brownfield” definition.

In consideration of the site background and as rendered in the Area of Concern Site Plan, submitted in the Sub (t) Application Package, the NJDEP determined that the 22 acres proposed for solar development does constitute a Brownfield as defined by the Solar Act of 2012.

The NJDEP advised Staff of additional considerations since the solar Project is proposed to be located on property that requires remediation. The property owner and the owner/operator of the solar installation must, in addition to any other actions required by law including, but not limited to, the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq., the Brownfield and Contaminated Site Remediation Act, N.J.S.A. 58:10B-1 et seq., and any regulations promulgated pursuant thereto, ensure that the solar installation: a) does not exacerbate the contamination at the property; b) does not interfere with any necessary remediation of the property; c) does not disrupt or change, without prior written permission from the NJDEP, any existing or future engineering or institutional control that is part of a remedial action for the property; and d) is protective of public health and the environment. The Applicant must contact the NJDEP’s Office of Permitting and Project Navigation to determine which permits may be required.

Based on the information contained in the application and the NJDEP’s findings, Staff recommends that the Board conditionally certify the Applicant’s 8.82 MWdc Project as being located on 22 acres of a “brownfield,” as that term is defined pursuant to Subsection (t). Staff also recommends that the Board authorize Staff to require that the conditions for certification provided by the NJDEP be fully documented as satisfied by the Applicant prior to Staff’s issuance of full certification of the Project’s eligibility for TRECs. In addition, Staff recommends that the Board direct the Applicant to file its TREC registration within 14 days of the date of the Order and explicitly grant conditional certification.

FINDINGS AND CONCLUSIONS

The Board **FINDS** that, as required by Subsection (t), Staff transmitted the application discussed above to NJDEP for a determination of eligible land use type and status of remediation on the proposed site. NJDEP determined that the solar array proposed for Block 77, Lots 4, 5 and 7 as documented in the Cumberland County tax records, is located on land meeting the Solar Act’s definition of a “brownfield.” To be eligible for the creation of TRECs, the facility must not exceed 8.82 MWdc and must be placed within the 22 acres of the brownfield depicted in the application. Based on information provided by NJDEP, the Board **FINDS** that the Solar Landscape’s Project is located on land meeting the Solar Act’s definition of a “brownfield.”

The Board also **FINDS** that NJDEP determined that the property owner will need to comply with State laws relevant to the property for the solar installation, as well as any other permits identified by the NJDEP, prior to construction of the solar electric power generation facility. The Board **FINDS** that the NJDEP has stated that the construction of the solar installation on the brownfield needs to address the remediation requirements of the property.

The Board **FINDS** that NJDEP's requirements must be addressed and thus **GRANTS** conditional certification of Applicant's proposed solar electric generation facility, to be located on 22 acres at the former Owens-Brockway Glass Container facility at Block 77, Lots 4, 5 and 7, in Bridgeton, Cumberland County, New Jersey, with an array size not to exceed 8.82 MWdc. To obtain full certification, the Board **DIRECTS** the Applicant to demonstrate to Staff that all NJDEP requirements have been satisfied.

In addition, to obtain full certification, the Board **DIRECTS** Solar Landscape to submit an initial TI Program registration package within 14 days of the effective date of this order, and to complete construction within two (2) years in accordance with N.J.A.C. 14:8-10.4(e)(4)(ii)(3). The Board **DIRECTS** Staff to issue full certification to the Project upon the Applicant's demonstration that all requirements for full certification – including all NJDEP requirements and all TREC eligibility requirements at N.J.A.C. 14:8-10, et seq. – have been satisfied. After the Applicant receives full certification, the Board **DIRECTS** Staff to issue a New Jersey Certification Number to the Project for purposes of TREC creation for a 15-year Qualification Life.

This Order is issued in reliance on the information certified in the application and does not grant any rights in connection with construction of the proposed Project beyond certification under Subsection (t), provided that the facilities are constructed in accordance with NJDEP requirements, the site plans filed with the application, and the TREC registration.

This Order shall be effective on December 28, 2022.

DATED: December 21, 2022

BOARD OF PUBLIC UTILITIES
BY:



MARY-ANNA HOLDEN
COMMISSIONER



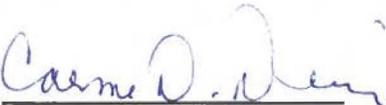
DIANNE SOLOMON
COMMISSIONER



ROBERT M. GORDON
COMMISSIONER



DR. ZENON CHRISTODOULOU
COMMISSIONER

ATTEST: 

CARMEN D. DIAZ
ACTING SECRETARY

I HEREBY CERTIFY that the within document is a true copy of the original in the files of the Board of Public Utilities.

IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C.24, THE SOLAR ACT OF 2012;

IN THE MATTER OF THE SOLAR TRANSITION PURSUANT TO L. 2018, C. 17 – APPLICATION FOR CERTIFICATION OF SOLAR FACILITY AS ELIGIBLE FOR TRECS PURSUANT TO SUBSECTION (T) OF THE SOLAR ACT OF 2012

SOLAR LANDSCAPE
OWENS ILLINOIS INCORPORATED

DOCKET NOS. EO12090832V, QO19010068, AND QO22030132

SERVICE LIST

Solar Landscape, LLC

Corey Gross
corey@solarlandscape.com

New Jersey Division of Rate Counsel

140 Front Street, 4th Floor
Post Office Box 003
Trenton, NJ 08625-0003

Brian O. Lipman, Esq., Director
blipman@rpa.nj.gov

Sarah H. Steindel, Esq.
Assistant Deputy Rate Counsel
ssteinde@rpa.nj.gov

New Jersey Division of Law

Department of Law & Public Safety
Division of Law
R.J. Hughes Justice Complex
25 Market Street
Post Office Box 112
Trenton, NJ 08625-0112

Daren Eppley, Section Chief, DAG
daren.eppley@law.njoag.gov

Pamela Owen, Assistant Section Chief, DAG
pamela.owen@law.njoag.gov

Steven Chaplar, DAG
steven.chaplar@law.njoag.gov

New Jersey Board of Public Utilities

44 South Clinton Avenue, 1st Floor
Post Office Box 350
Trenton, NJ 08625-0350

Carmen D. Diaz, Acting Secretary
board.secretary@bpu.nj.gov

Bob Brabston, Executive Director
robert.brabston@bpu.nj.gov

Stacy Peterson, Deputy Executive Director
stacy.peterson@bpu.nj.gov

Division of Clean Energy

Kelly Mooij, Director
kelly.mooij@bpu.nj.gov

Stacy Richardson, Deputy Director
stacy.richardson@bpu.nj.gov

Benjamin S. Hunter, Manager
benjamin.hunter@bpu.nj.gov

Earl Thomas Pierce, Administrative Analyst
earl.pierce@bpu.nj.gov

Jamal Garner, Environmental Engineer
jamal.garner@bpu.nj.gov

Diane M. Watson, Research Scientist
diane.watson@bpu.nj.gov

Counsel's Office

Michael Beck, General Counsel
michael.beck@bpu.nj.gov

Rachel Boylan, Legal Specialist
rachel.boylan@bpu.nj.gov