



Board of Public Utilities
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Thank you for the opportunity for us to provide comments regarding the New Jersey Board of Public Utilities' (BPU) Energy Master Plan (EMP). As we consider the new EMP's various policies and incentives that will support the plan, it is important to identifying the goals of a sustainable and resilient state while also recognizing how those goals will be implemented. The State of New Jersey is in vital point of upgrading its electrical infrastructure to address the need for more resiliency and preparedness regarding sea level rise and the increased storm frequency and intensity.

The BPU has already invested millions of dollars furthering distributed generation, microgrids, solar and storage as well as various other technologies that will help bring New Jersey's utility grid into the 21st century. As we consider how to better utilize the societal benefits charges and transition from the current SREC program, we urge the Board to consider strengthening various rebates and incentives that reinforce sustainability and resiliency especially through innovative technologies. Microgrids, known as islandable distributed generation with black start capability, with availability during times of emergency and other times of need, should be considered when determining the necessary incentives. We believe furthering incentives that are capable of providing critical power at times of need, help facilitate public policies identified in the EMP and further support emergency services which are well needed.

Accelerating deployment of microgrids, renewable energy (RE) and distributed energy resources (DER) will necessitate changes to the distribution system; including opening circuits that are currently constrained. Revisiting the current interconnection processes and other regulatory hurdles will be necessary immediately in order to appropriately plan for and accommodate increasing penetration of microgrids, RE, DER, vehicle charging infrastructure and the anticipated increased load from migration to electric vehicles (EVs). This will also entail thoughtful exploration of rate designs that align the growth of RE, DER, EVs and fairly compensates multiple new players as well as the existing utilities.

We urge the Board to consider increasing rebates through the Clean Energy Program and increasing the value of Solar Renewable Energy Credits for projects that are incorporated into microgrids or available during emergency times. This policy only helps to further the goals of the EMP and the goals highlighted by the Governor post several nor'easters last year. We thank you for your consideration of these comments.

Best Regards,
Adam Zellner