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October 5, 2012

VIA ELECTRONIC MAIL (rule.comments@bpu.state.nj.us)
AND OVERNIGHT DELIVERY SERVICE

Kristi Izzo, Secretary
New Jersey Board of Public Utilities
ATTN: BPU Docket Number EX11120885V
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

Re: Renewable Energy and Energy Efficiency
Proposed Amendments: N.J.A.C. 1:8-1.2, 2.9, 4.1, 4.2, 4.3 and 5.2
BPU Docket No.: EX11120885V
Proposal No.: PRN 2012-099

Dear Secretary Izzo:

Please accept this letter as the comments of New Jersey Division of Rate Counsel ("Rate Counsel") regarding the Board of Public Utilities' ("BPU" or "Board") proposed amendments to its Renewable Energy and Energy Efficiency rules, N.J.A.C. 14:8-1.2, 2.9, 4.1, 4.2, 4.3 and 5.2, as published for public comment in the August 6, 2012 New Jersey Register, 44 N.J.R. 2043(a). Enclosed is one additional copy. Please date stamp the copy as "filed" and return to us in the enclosed self-addressed, stamped envelope. Thank you for your consideration and attention to this matter.

INTRODUCTION

Rate Counsel has serious concerns about the current rulemaking. The Board is proposing a legally questionable and potentially expensive expansion of the entities that could receive “net metering” credits for solar and other renewable generation, with no meaningful analysis of the costs and benefits of the proposed rule changes.

Under the Electric Discount and Energy Competition Act of 1999 (“EDECA”), N.J.S.A. 48:3-49 et seq., net metering is a mechanism designed to encourage electricity users to develop renewable resources that can be used to offset their own electricity usage. The renewable energy resource is connected on the customer’s side of the utility’s metering equipment, and the net metering customer pays only for the “net amount of electricity supplied” by the customer’s supplier of electric generation service. N.J.S.A. 48:3-87(e)(1). Further, a net metering customer may, at times, produce more electricity than it uses. In that event, the excess electricity generation is carried over into subsequent billing periods, to be credited to the customer at a later time. Net metering customers can receive such credits for electricity delivered by the customer over 12-month period up to the amount of electricity supplied to the customer by the generation service provider over that same period. Id. The size of the system allowed to be net metered cannot exceed the estimated annual usage of the customer. N.J.A.C. 14:8-4.3(a).

As is explained below, the proposed rulemaking would make a fundamental change in the scope of net metering. Under EDECA, the special benefits of net metering are granted to a limited class of renewable energy generators—electricity end users that generate electricity for their own use. N.J.S.A. 48:3-87(e)(1). The Board, however, is proposing a rule change that

would open up net metering to large-scale “mini-utilities” serving multiple customers, an expansion not contemplated by the statute.

The rulemaking proposal also does nothing to correct a serious flaw in the Board’s existing rule that results in excessively high net metering credits. By statute, net metering credits are limited to generation service. N.J.S.A. 48:3-87(e)(1). The Board, however, has required net metering credits to include distribution charges, and other surcharges, thus improperly allowing net metering customers to avoid paying their fair share distribution-related costs and surcharges including the Societal Benefits Charge (“SBC”).

The proposed rule changes, together with the Board’s ongoing failure to limit net metering credits as contemplated by EDECA, could result in substantial increases in the subsidies provided to net metered projects. The Board’s current regulations subsidize net metering customers by allowing them to pay less than their fair share of the costs of distribution service and surcharges including the SBC, resulting in increased distribution charges and higher SBC charges for other ratepayers. Ratepayers could also be burdened with the costs of transmission and distribution system upgrades that may be necessitated by increasing levels of solar and renewable resources on the State’s electric distribution systems. Further, it should be noted that the State has met its Renewable Portfolio Standards (“RPS”) goals without the need for expanded net metering. Nevertheless, the Board has not presented any analysis that would provide a reasonable basis for concluding that the costs of the proposed rule changes would be justified by the expected benefits.

Under the New Jersey Administrative Procedure Act (“APA”), a rulemaking proposal must be accompanied by statements describing the economic and other impacts of the proposed

rule. N.J.S.A. 52:14B-4(a)(2). As detailed below, the Board has provided no meaningful analysis of the economic and other potential impacts of the proposed rule changes. Further, although the document refers to some generalized benefits of solar and other renewable technologies, it has not explained why it believes additional subsidies are needed at a time when the State is exceeding its targets for solar energy development.

For the reasons explained in detail below, the Board should not adopt the proposed rule changes that would expand the scope of net metering. Further, the Board should take immediate steps to amend the existing rule to require net metering customers to pay their proper share of distribution charges and surcharges including the SBC.

I. THE PROPOSED EXPANSION OF NET METERING IS CONTRARY TO THE STATUTORY PROVISION LIMITING NET METERING TO CUSTOMERS THAT GENERATE ELECTRICITY FOR THEIR OWN USE.

In its proposed rulemaking, the Board is seeking to make a far-reaching change to its existing rules on net metering. The proposed changes would expand the scope of net metering well beyond the limits defined by the governing provisions of EDECA,

The Board's basic grant of authority to implement net metering is found in N.J.S.A. 48:3-87(e)(1), which authorizes the Board to require "electric power suppliers and basic generation service providers" to offer net metering to "industrial, large commercial, residential and small commercial customers ... that generate electricity, on the customer's side of the meter, using a Class I renewable energy source ..." (emphasis supplied).¹ The term "customer" is defined in

¹ "Class I renewable energy" is a category defined as electricity produced by solar technologies, photovoltaic technologies, wind energy, fuel cells, geothermal technologies, wave or tidal action, certain small-scale hydropower facilities, methane gas from landfills, or sustainably harvested biomass. N.J.S.A. 48:3-51.

EDECA as a “person that is an end user and is connected to any part of the transmission and distribution system within an electric public utility’s service territory ... within this State.”

N.J.S.A. 48:3-51. Thus, the statute contemplates that net metering will be available to customers—defined as end users of electricity—that generate renewable energy to offset against their own use.

The Board’s current regulations properly limit the availability of net metering to “customers ... that generate electricity” as provided by statute. N.J.S.A. 48:3-87(e)(1). Specifically, the Board’s existing rule limits net metering to “customer-generators,” defined as “electricity customer[s], such as an industrial, large commercial, residential or small commercial customer that generates electricity on the customer’s side of the meter, using a class I renewable energy source.” N.J.A.C. 14:8-4.2 and 4.3. The proposed new rule would modify this basic statutory requirement.

The Board is proposing to add the following sentence to the definition of “customer-generator”:

The Board may deem a pair of entities acting together—that is, a net metering generator and a net metering customer—to constitute one customer-generator for the purpose of net metering.

Proposed amendment to N.J.A.C. 14:8-4.2. The additional language encompasses two proposed new defined terms: “Net metering customer,” defined as “a customer that owns and/or operates electrical wires and/or equipment that is connected to the EDC’s electric distribution system through a meter used for net metering,” and “Net metering generator,” defined as “an entity that owns and/or operates a renewable energy generation facility, the electricity from which is

delivered to a net metering customer.” Both definitions specifically provide that the net metering customer and the net metering generator “may or may not be the same entity....” Id.

The proposed new definitions also provide that the net metering customer and the net metering generator “may or may not be located on the same property” as the net metering generator. Proposed amendment to N.J.A.C. 14:8-4.2. Elsewhere the proposed new rules state that the “net metering generator” could be located either on the same property as the end user, or on a property “contiguous” to the end user’s property. Proposed N.J.A.C. 14:8-4.1(b)(1). Further, a single entity could construct “more than one” generating facility on a single property, as long as each facility served a separate customer. N.J.A.C. 14:8-4.1(b)(3). Conceivably a “net metering generator” could find or assemble a property touching on several other “contiguous” properties and operate as an unregulated “mini utility” serving several customers from the same location through its own networks of distribution wires and related equipment. Such entities would not be subject to regulation as utilities, and would be outside the Board’s direct control with regard to issues such as engineering standards and service quality.

With these changes, the Board appears to be proposing to incorporate the concept of an “on site generation facility” into the net metering regulations. Under EDECA, an on-site generation facility is defined as a generation facility that provides electricity to an end user “located on the property or on property contiguous to the property on which the end user is located.” N.J.S.A. 48:3-51. An “on-site generation facility,” which may be owned by a different entity from the end user and which may or may not be fueled by renewable energy source, is allowed to sell electricity to the end user without being deemed a public utility. Id. By delivering directly to the end user, on-site generation facilities avoid paying utility’s charges for electric

distribution service for electricity use on-site. However, customers using on-site generation (unless they meet the more stringent standards for net metering) are not allowed to “put” excess generation into the State’s electric distribution system. On-site generation facilities also are not required to collect the Societal Benefits Charge (“SBC”) or other surcharges for power used on-site, but must collect such charges for any power delivered off-site. N.J.S.A. 48:3-77.

The proposed rule change would extend the benefits of net metering to all on-site generation facilities fueled by Class I renewable energy sources. Instead of being available only to customers generating electricity for their own use, net metering would be expanded to separate “net metering generators” that could serve multiple end users. This change is contrary to the statutory provisions limiting net metering to “customers ... that generate electricity” N.J.S.A. 48:3-87(e)(1).

The proposed rule changes are also defective because they would give the Board unbridled discretion to “deem,” or, presumably, decline to deem, “a pair of entities acting together—that is, a net metering generator and a new metering customer—to constitute one customer-generator for the purpose of net metering.” Proposed amendment to N.J.A.C. 14:8-4.2. As the New Jersey Supreme Court has stated, “[A]dministrative officers [should] articulate the standards and principles that govern their discretionary decisions in as much detail as possible.” Crema v. New Jersey Dept. of Environmental Protection, 94 N.J. 286, 301 (1983)(quoting Environmental Defense Fund v. Ruckelshaus, 439 F.2d 584, 598 (D.C.Cir.1971)). Agencies must “structure and confine their discretionary powers through safeguards, standards, principles and rules.” Crema, 94 N.J. at 301 (quoting Historic Green Springs, Inc. v. Bergland, 497 F. Supp. 839, 854 (E.D.Va.1980)). By failing to articulate any standards that define when the Board

would, or would not, deem two entities to be a single “customer-generator,” the proposed regulations would leave the public with no guidance on what factors the Board would consider in making such determinations. The Board may not make discretionary determinations of this nature without disclosing the standards it will use in making those determinations as part of a properly adopted rule. 613 Corp. v. State, Div. of State Lottery, 210 N.J. Super. 485, 502-03 (App. Div. 1986); See Metromedia v. Dir., Div. of Taxation, 97 N.J. 313, 333-34 (1984).

II. THE BOARD IS PROPOSING TO CONTINUE IN EFFECT AN EXISTING RULE THAT UNLAWFULLY REQUIRES EDCs TO INCLUDE DISTRIBUTION CHARGES AND SURCHARGES IN THE CREDITS THEY PROVIDE TO NET METERING CUSTOMERS.

Compounding the effect of the proposed unwarranted expansion of net metering is the Board’s failure to make changes in the regulation that defines the rate components that must be included in net metering credits. The current rule requires the State’s electric distribution companies (“EDCs”) to exempt net metering customer from paying their fair share of distribution system costs, SBC payments, and other surcharges, at the expense of other ratepayers. The current rule is contrary to the provisions of EDECA that describe the SBC as “non-bypassable” and contemplate paying net metering customer only for electric generation service. N.J.S.A. 48:3-87(e)(1) and 60(a).

One of the key concepts of EDECA was the “unbundling” of the provision of energy from the service of distributing that energy over the State’s electric and gas distribution infrastructure. N.J.S.A. 48:3-52 and 58. New Jersey’s EDCs, which formerly provided bundled electric generation and distribution service, now maintain their State-sanctioned monopolies only as to distribution service. The EDCs’ customers are now free to purchase electric generation

service from non rate-regulated “electric power suppliers.” N.J.S.A. 48:3-53. The EDCs provide electric generation service, known as “basic generation service,” or “BGS” to their customers who do not buy electric generation service from a non-utility electric power supplier. See N.J.S.A. 48:3-57. BGS is, however, separate and distinct from the electric distribution service provided by the EDCs. N.J.S.A. 48:3-52.

Under EDECA, the obligation to provide net metering is limited to providers of electric generation service. N.J.S.A. 48:3-87 (e)(1) provides that the Board’s net metering standards “shall require electric power suppliers and basic generation service providers to offer net metering

 (emphasis supplied). The cited provision does not require net metering to be provided by sellers of electric distribution service. Although the State’s electric utilities currently provide both distribution service and electric generation service in the form of BGS, EDECA requires them to provide net metering only in their capacities as providers of BGS.

The Board’s current rules ignore this fundamental limitation on net metering. N.J.A.C. 14:8-4.3(a) requires the provision of net metering by “all electric distribution companies (EDCs) and supplier/providers.” The latter term is defined to include “an electric power supplier or a basic generation service provider” N.J.A.C. 14:8-1.2. Thus, the regulation, unlike the statute imposes the obligation to net meter on EDCs as EDCs, not merely in their capacities as BGS providers. The required net metering credits are defined in N.J.A.C. 14:8-4.3(l), which provides as follows:

A supplier/provider or EDC shall provide net metering at non-discriminatory rates that are identical, with respect to rate structure, retail rate components, and any monthly charges, to the rates that a customer-generator would be charged if not a customer-generator, except that a supplier/provider or EDC may use a special load profile for the customer-generator, which incorporates the customer-

generator's real time generation, provided the special load profile is approved by the Board.

Although this provision is less than clear to a reader unfamiliar with the Board's practices with regard to net metering, this provision is applied by the Board to require the EDCs to provide net metering credits that include distribution charges, the SBC and other surcharges. In other words, the Board's current rules allow net metering customers to deliver electric generation but receive payment for generation, plus distribution and surcharges including the SBC.

As noted above, "net metering" customers are allowed to size their facilities to provide up to 100% of their total annual usage. N.J.S.A. 48:3-87(e)(1); N.J.A.C. 14:8-4.3(a). A customer with a system producing exactly 100% of the customer's usage on an annualized basis could pay nothing for distribution service, even though net metering customers use the EDC's distribution system, and could completely avoid paying SBC and other surcharges. This result is not just or reasonable for the other customers who must pick up the costs not paid by net metering customers, and it is contrary to the provisions of EDECA that describe the SBC as "non-bypassable" and explicitly limit net metering to electric generation service. N.J.S.A. 48:3-60-a and 87(e)(1).

The above-mentioned flaw in the Board's current regulations was raised by Rate Counsel in informal comments submitted to the Board in response to "Straw Proposals" that were circulated by Board Staff in July and September of 2011. Rate Counsel Comments on Staff Draft/Straw Proposal for Amendments to Net Metering Regulations (July 29, 2011); Rate Counsel Comments on September 16, 2011 Revised Staff Draft/Straw Proposal for Amendments to Net Metering Regulations (Oct. 19, 2011). Nonetheless the Board's rulemaking proposal does

not address the evident lack of consistency between its regulations and the language of the controlling statute.

III. THE BOARD HAS NOT CONDUCTED ANY MEANINGFUL ANALYSIS OF THE COSTS AND BENEFITS OF THE PROPOSED EXPANSION OF NET METERING, AND THUS HAS FAILED TO ESTABLISH A NON-ARBITRARY BASIS FOR THE PROPOSED RULE CHANGE AND HAS FAILED TO PROPERLY CONDUCT THE IMPACT ASSESSMENTS REQUIRED UNDER THE APA.

The Board's proposed expansion of net metering could impose significant burdens on utilities' other rate classes through cross-subsidization. Yet, the Board's rulemaking document contains essentially no analysis of the costs the proposed rule change would impose on ratepayers, and no analysis of the level of benefits that would be attained if the rule change were adopted. In both of its previous informal comments to the Board, Rate Counsel listed the kinds of costs and benefits that would be required to determine whether the proposed rule changes are warranted. Specifically, Rate Counsel recommended that the Board examine: (1) how broadly the proposed amendments would expand eligibility for net metering; (2) how much the proposal would increase net metering load; (3) what amount of increased distribution level investments and increased maintenance, metering and voltage monitoring and regulation costs would be incurred as a result of the proposal; and (4) the scope of the potential benefits, as well as costs, that would arise from the proposed amendments. Rate Counsel Comments on Staff Draft/Straw Proposal for Amendments to Net Metering Regulations at 4 (July 29, 2011); Rate Counsel Comments on September 16, 2011 Revised Staff Draft/Straw Proposal for Amendments to Net Metering Regulations at 3 (Oct. 19, 2011). To date, Rate Counsel has seen no analysis of the potential costs that would be placed on other ratepayers, or any analysis of the benefits that would justify imposing such costs on ratepayers.

The rulemaking document published in the New Jersey Register includes several sections purporting to contain the description of the economic and other impacts that are required to be included as part of agency rule proposals in New Jersey. N.J.S.A. 52:14B-4(a)(2). These sections are, however, based upon undocumented and un-investigated assertions, and are not supported by any genuine analysis.

The “Social Impact” section asserts that the expansion of net metering will have a “positive social impact” for New Jersey since increased investment in renewable energy will, among other things, help alleviate the demand for large transmission investments, reduce congestion and overloading, reduce power outages and improve reliability. Yet, no analysis of the level of these asserted benefits, much less the cost of attaining these asserted benefits, has been provided.

The same shortcomings are apparent in the “Economic Impact” section. The Board recognizes that the proposed expansion of net metering “has the potential to have an impact on ratepayers,” but fails to provide any analysis or estimate of the degree to which its proposed changes in the net metering definition will impact ratepayers. The Board recognizes that the current “full retail credit,” which, as explained above, exempts net metering customers from paying distribution charges and the SBC, results in subsidies to net metering customers at the expense of other ratepayers. The Board also recognizes that the costs of transmission and distribution system improvements needed to accommodate renewable energy resources may also be passed on to non net-metering customers. There is, however, no analysis of the level, or even the order of magnitude, of the rate increases that could result from the adoption of the proposed rule change. Instead, the Board asserts this is not an issue of concern since “the amendments

have the potential to increase the beneficial effects of net metering” by “a greater reduction in electricity costs in the long-run.” Once again, no quantification of these benefits has been provided. The costs of the proposed rule changes, as well as their purported benefits, are not explicitly expressed and are simply assumed to offset each other and presumably result in positive net benefits.

The “Jobs Impact” section states that the expansion of net metering rule will “tend to have a positive impact on jobs in the development, construction and operation of renewable energy facilities.” Again, this section contains no supporting analysis. The Board has not attempted to quantify the expected jobs to be gained from the construction and operation of renewable facilities. Further, the Board has not mentioned the potential for job losses that may occur due to rate increases for non net-metering residential and business electricity users. The “Jobs Impact” section does not contain the required “assessment of the number of jobs to be generated or lost if the proposed rule takes effect,” N.J.S.A. 52:14B-4(a)(2), and, does not contain any actual analysis to support the assertion that the Board’s proposal will “tend to have a positive impact on jobs” in New Jersey.

The Board’s “Housing Affordability Impact Analysis” is similarly deficient. This section again acknowledges that the proposed rule changes will “have some effect on electricity rates,” but then simply assumes that electricity rates “do not affect housing prices or the housing market.” Utility rates have long been recognized as an important factor in housing affordability, especially for low-income households. See, e.g. 24 C.F.R. §§5.632 and 5.634 (utility allowances for Section 8 tenants whose rent does not include utilities). In the absence of some quantification

of the expected rate impacts of the Board's proposal, there is no basis for the Board's conclusion that housing affordability will not be affected.

The Board's section on "Agriculture Industry Impact" states that "[t]he Board does not expect the proposed amendment to have a direct material effect on the agriculture industry in New Jersey." In support of this statement, the Board asserts that increased renewable energy generation will benefit agriculture by "displac[ing] fossil generation that is linked to acid rain, global warming, and other air pollution that can harm agricultural crops." Not only are the asserted benefits unsupported by any analysis, the Board has disregarded serious concerns that encouraging renewable energy project development may undermine the State's goals for preserving valuable farmland. See 2011 New Jersey Energy Master Plan at 7, 107 (Dec. 6, 2011).

The Board's "Smart Growth Development Impact Analysis" is also deficient. The Board asserts that the rule changes "do not affect housing production or the price of housing" in the areas of the state that are designated for growth, but does not even broach the subject of the potential impact of the proposed rules on the preservation of open spaces in areas not designated for growth.

In summary, there is simply nothing in the record at this point to support the proposed rule change. The Board's descriptions of the economic and other impacts of the proposed rule changes consist of nothing more than unsupported assertions that they will produce net benefits. The Board recognizes the potential for negative impacts, but simply dismisses them based on a belief that they will be outweighed by the presumed benefits of the rule changes. The Board's rulemaking proposal does not include the analysis required under the APA, and does not provide a substantial basis in the record for the rule changes being proposed.

The Board's rule proposal, in many ways, appears to be a solution in search of a problem. The current rule proposal dates back to July and September of 2011, when Board Staff circulated its "Straw Proposals," and many of the ideas and concepts of expanding net metering go back even further in time. The goal of these past proposals to expand the definition of net metering was to expand the opportunities for developing in-state renewable energy, particularly solar energy, which, prior to 2011, was falling short of the Board's solar RPS targets.

Yet, over the past two years, solar installations have begun to surge, due to solar installation and component cost decreases, and federal tax benefits, as well as the Board's policies encouraging longer-term contracting. This year will see a record level of solar installations and according to the Office of Clean Energy, solar installations levels are expected to exceed the State's RPS targets for at least the next four years. See attached Exhibit 1. This dramatic increase in the supply of solar energy, and SRECs, has led to a new set of concerns addressed primarily to maintaining SREC prices in an otherwise over-supplied market. The need for changes in net metering rules encouraging more solar and other renewable installations, in the face of what the solar industry characterizes as an already over-supplied market, seems questionable, particularly considering that the proposed rules are founded on a number of unsubstantiated legal, policy and economic foundations.

There may well be steps the Board could take to create additional cost-effective opportunities for the development of renewable energy resources in the State. However, such an endeavor requires a careful and methodical analysis of the costs and benefits of the proposed regulatory changes. Such an analysis is lacking for the current proposal. The Board has not defined any issues that need to be addressed by a regulatory change, and it has not identified or

quantified potential inefficiencies that could arise from expanding net metering as proposed. In the absence of these fundamental underpinnings, the Board should not adopt the rule changes that would expand the scope of net metering.

CONCLUSIONS

For the reasons explained in above, the Board should not adopt the proposed rule changes that would expand the scope of net metering. Further, the Board should take immediate steps to amend the existing rule that requires the inclusion of distribution charges, the SBC and other surcharges in the credits provided to net metering customers for excess generation.

Respectfully submitted,

STEFANIE A. BRAND
DIRECTOR, DIVISION OF RATE COUNSEL

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**Renewable Energy and Energy Efficiency Rulemaking
BPU Docket No. EX11120855
Proposal No. PRN2012-099
Rate Counsel Comments**

EXHIBIT 1

NJCEP Solar Generation Forecast				
Energy Year	Item	Low	Medium	High
2012	OCE Projected SREC Availability (MWh)	641,900	641,900	641,900
	NJ Solar RPS Requirement (MWh)	442,000	442,000	442,000
	Percentage of RPS Requirement	145.23%	145.23%	145.23%
2013	OCE Projected SREC Availability (MWh)	1,255,600	1,291,100	1,355,200
	NJ Solar RPS Requirement (MWh)	596,000	596,000	596,000
	Percentage of RPS Requirement	210.67%	216.63%	227.38%
2014	OCE Projected SREC Availability (MWh)	1,819,300	1,974,700	2,177,300
	NJ Solar RPS Requirement (MWh)	1,726,615	1,726,615	1,726,615
	Percentage of RPS Requirement	105.37%	114.37%	126.10%
2015	OCE Projected SREC Availability (MWh)	2,299,600	2,667,400	3,054,800
	NJ Solar RPS Requirement (MWh)	2,093,566	2,093,566	2,093,566
	Percentage of RPS Requirement	109.84%	127.41%	145.91%
2016	OCE Projected SREC Availability (MWh)	2,681,300	3,355,800	3,975,200
	NJ Solar RPS Requirement (MWh)	2,383,652	2,383,652	2,383,652
	Percentage of RPS Requirement	112.49%	140.78%	166.77%

Source: “OCE Projected SREC Availability (MWh)” is from the Office of Clean Energy’s July 19, 2012, Renewable Energy Program Update (p. 14 and 15). “NJ Solar RPS Requirement (MWh)” is calculated as the Energy Year’s Solar RPS Percentage Requirement multiplied by retail sales. Retail sales subject to the NJ RPS for EY11 were 81,771,940 MWh. This number is increased annually by 1.5 percent. (See http://www.njcleanenergy.com/files/file/program_updates/NJRPS%20EY11%20Solar%20Compliance%20Update%20as%20of%20September%2030,%202011.pdf)