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Agenda Item: 8F

STATE OF NEW JERSEY
Board of Public Utilities
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CLEAN ENERGY

IN THE MATTER OF A NEW JERSEY SOLAR
TRANSITION PURSUANT TO P.L. 2018, C.17

ORDER

IN THE MATTER OF THE PETITION OF GREENSKIES
CLEAN ENERGY LLC FOR EXTENSION OF THE
SOLAR TRANSITION INCENTIVE PROGRAM
COMMERCIAL OPERATION DEADLINE FOR A
MECHANICALLY COMPLETE PROJECT -
NJSTRE1547434721

DOCKET NO. QO19010068

DOCKET NO. QO23080570

IN THE MATTER OF THE PETITION OF GREENSKIES
CLEAN ENERGY LLC FOR EXTENSION OF THE
SOLAR TRANSITION INCENTIVE PROGRAM
COMMERCIAL OPERATION DEADLINE FOR
MECHANICALLY COMPLETE SOLAR PROJECTS AT
SAYREVILLE SCHOOLS

DOCKET NO. QO23090643

IN THE MATTER OF THE VERIFIED PETITION OF
STANDARD SOLAR, INC. FOR REINSTATEMENT OF
THE PATERSON PUBLIC SCHOOL SOLAR PROJECTS
INTO THE TI PROGRAM AND FOR AN EXTENSION OF
THE PROJECTS' COMMERCIAL OPERATION
DEADLINE DATE

DOCKET NO. QO23080609

IN THE MATTER OF THE VERIFIED PETITION OF
ONYX RENEWABLE PARTNERS, L.P. FOR AN
EXTENSION OF TIME TO RESPOND TO
ADMINISTRATIVE DEFICIENCIES IN A POST-
CONSTRUCTION CERTIFICATION PACKAGE AS
IDENTIFIED BY THE SREC REGISTRATION PROGRAM

DOCKET NO. QO23120877

Parties of Record:

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Steven S. Goldenberg, Esq., Standard Solar, Inc.
Meghan E. Atallah, Esq., Onyx Renewable Partners L.P.

BY THE BOARD:

By this Order, the New Jersey Board of Public Utilities (“Board” or “NJBP”) considers the petitions of Greenskies Clean Energy LLC (“Greenskies”), Standard Solar, Inc. (“Standard”), and Onyx Renewable Partners, L.P. (“Onyx”) (together, “Petitioners”) for an extension of time for registrations within the Transition Incentive (“TI”) Program and the projects’ conditional acceptance as solar projects serving public entities (“public entity projects”).¹ The Board addresses these petitions together because the Petitioners’ projects had all been conditionally accepted in the TI Program as public entity projects.

BACKGROUND

Over the past decade, an increasing number of public entities have pursued solar power, which has the potential to allow public entities to reduce electricity expenditures and to participate in New Jersey’s clean energy economy. Many of these entities are currently benefitting, directly or indirectly, from the Board’s solar incentives. As such, they are subject to and impacted by the timelines in the Board’s solar programs, including the TI Program.

On May 23, 2018, Governor Murphy signed the Clean Energy Act of 2018 (“CEA”), L. 2018, c. 17 (N.J.S.A. 48:3-87 *et al.*), into law. In pertinent part, the CEA directed the Board to adopt rules and regulations closing the Solar Renewable Energy Certificate Registration Program (“SRP”) to new applications once the Board determines that 5.1 percent of the kilowatt-hours of electricity sold in the State of New Jersey (“State”) by Third Party Suppliers (“TPS”) and Basic Generation Service (“BGS”) providers is generated by solar electric power generators connected to the distribution system (“5.1% Milestone”). N.J.S.A. 48:3-87(d)(3). 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.

By Order dated December 6, 2019, the Board established the TI Program as a bridge between the legacy SRP and the to-be-developed Successor Solar Incentive (“SuSI”) Program.² Rules for the TI Program, N.J.A.C. 14:8-10.1 *et seq.* (“TI Rules”) took effect on October 5, 2020.³ The TI Rules permit eligible projects to receive a Transition Renewable Energy Certificate (“TREC”) for each megawatt-hour (“MWh”) of electricity produced through solar generation. The TI Program portal opened to new applications on May 1, 2020, and, pursuant to Board Order dated January 8, 2020, remained open to new registrations until the establishment of the SuSI Program.⁴ The TI Rules do not provide for automatic or administrative extensions to the projects’ conditional registration expiration dates.⁵

¹ The Board defines “public entities” consistent with the definition previously utilized by the Board in the Administratively Determined Incentive Program at N.J.A.C. 14:8-11.2: an electric utility customer that is a State entity, school district, county, county agency, county authority, municipality, municipal agency, municipal authority, or New Jersey public college or university.

² In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17, BPU Docket No. QO19010068, Order dated December 6, 2019.

³ 52 N.J.R. 1048(a); 52 N.J.R. 1850(a).

⁴ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17, BPU Docket No. QO19010068, Order dated January 8, 2020 (“January 2020 Order”).

⁵ The conditional registration “expiration dates” are also referred to as the registration deadline.

By Order dated July 29, 2020, the Board granted projects registered in the TI Program on or before October 30, 2020 a one (1)-year extension through October 30, 2021 to reach commercial operation.⁶ The Board looks to the date on which a solar facility receives Permission to Operate (“PTO”) from its electric distribution company (“EDC”) as evidence that commercial operation has been achieved. N.J.A.C. 14:8-10.2. In the July 2020 Order, the Board found that the solar industry was adjusting to significant changes from both the COVID-19 Pandemic and changes in solar incentive programs, and that under those circumstances, waiving the Board’s rules to permit additional time for project completion appropriately balanced the needs of the solar industry with the cost to ratepayers.

By Order dated June 24, 2021, the Board found that the solar industry required further time to adjust to the requirements of the CEA and the impacts of the COVID-19 Pandemic.⁷ Accordingly, the Board granted projects registered in the TI Program on or before the effective date of the June 2021 Order a six (6)-month extension to the deadline established by N.J.A.C. 14:8-10.4.

On July 9, 2021, Governor Murphy signed the Solar Act of 2021 (“Act”), L. 2021, c. 169, into law. Among other mandates, the Act directed the Board to immediately initiate a proceeding to develop and launch a successor solar incentive program. By Order dated July 28, 2021, the Board announced the closure of the TI Program in anticipation of launching the SuSI Program.⁸ In a companion Order on the same agenda, the Board opened the SuSI Program.⁹ The TI Program closed on August 27, 2021, and the SuSI Program opened on August 28, 2021.

The SuSI Program is divided into two (2) components: the Administratively Determined Incentive (“ADI”) Program and the Competitive Solar Incentive (“CSI”) Program. Both the ADI and CSI Programs provide one (1) SREC-II for each MWh of solar electricity produced from a qualifying facility. The ADI Program, opened to new registrants on August 28, 2021, offers a fixed SREC-II incentive for net metered residential facilities, net metered non-residential facilities of five (5) MW or less, and community solar facilities. The CSI Program awards SREC-IIs through a competitive solicitation to qualifying grid supply solar facilities - those selling into the wholesale markets - and net metered non-residential facilities greater than five (5) MW in size.¹⁰

By Order dated January 26, 2022, the Board waived N.J.A.C. 14:8-11.4(b) which requires receipt of conditional registration in the ADI Program prior to beginning construction on a solar facility, for projects possessing a valid TI Program registration on the date of the Order.¹¹ The January 2022

⁶ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17 – Order Providing Extensions to Solar Transition Projects, BPU Docket Nos. QO19010068 & QO20070484, Order dated July 29, 2020 (“July 2020 Order”).

⁷ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17 – Order Addressing Requests for Extension for Projects in the Solar Transition Incentive Program, BPU Docket Nos. QO19010068 & QO21060883, Order dated June 24, 2021 (“June 2021 Order”).

⁸ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17, BPU Docket No. QO19010068, Order dated July 28, 2021.

⁹ In re a Solar Successor Incentive Program Pursuant to P.L. 2018, c. 17, BPU Docket No. QO20020184, Order dated July 28, 2021 (“SuSI Order”).

¹⁰ In re Competitive Solar Incentive (“CSI”) Program Pursuant to P.L. 2021, c.169 - Order Launching the CSI Program, BPU Docket No. QO21101186, Order dated December 7, 2022 (“CSI Order”).

¹¹ In re a Solar Successor Incentive Program Pursuant to P.L. 2018, c.17, Order Modifying ADI Program Eligibility Conditions, BPU Docket No. QO20020184, Order dated January 26, 2022 (“January 2022 Order”).

Order permitted these projects to apply for registration in the ADI Program even if construction had commenced prior to receipt of a conditional registration and directed Staff to propose amendments to the SuSI Program Rules to address this issue. On December 18, 2023, amendments were adopted permitting all otherwise eligible projects that had had valid TI Program registrations to be eligible for the ADI Program despite having commenced construction prior to being accepted.¹²

On June 8, 2022, the Board issued an Order granting a conditional extension in the TI Program to ESNJ-KEY-GIBBSTOWN, LLC, subject to a showing that certain specified conditions applied.¹³ In the Gibbstown Order, the Board found good cause to grant a conditional extension to the petitioner's project since it was electrically and mechanically complete; had secured all necessary permits; and was prevented from meeting its TI Program deadline only by a unilateral change to the interconnection agreement requirements made by the EDC following the developer's reliance on the original terms, specifically the time in which EDC interconnection upgrades would be completed.¹⁴ The Gibbstown Order also established a process for petitioners who believe that they are similarly situated to apply for extensions to their registration, subject to making a similar showing.¹⁵

By Order dated August 17, 2022, the Board granted a blanket extension to all public entities with solar projects in the TI Program, subject to demonstrating that certain specified conditions applied.¹⁶ The Board found good cause to grant a conditional extension to the petitioners' projects because waiving the development timelines for public entities with solar projects appropriately balanced the Board's goal of promoting solar development with the goal of ensuring that the ratepayers' dollars were supporting projects that would be completed in a reasonable time period. Additionally, the Board found that full compliance with the existing rules might adversely affect the interest of the general public in the success of and the benefits deriving from publicly owned solar projects, and that requiring strict compliance with timelines for projects subject to the public procurement process might result in hardship to schools and other governmental entities. The Public Entity 2022 Order established a process by which petitioners may apply for up to two (2) six-month extensions to their TI Program registration deadline.

In another Order on the same agenda, the Board denied fifteen (15) petitions for extensions in the TI Program, finding that the general allegations of supply chain disruptions, a tight labor market, and/or interconnection processing delays did not constitute good cause to waive the Board's rules.¹⁷

¹² 55 N.J.R. 2555(a).

¹³ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c.17 – Order Addressing Request for an Extension of Time to Complete NJSTRE1545046932 in Transition Incentive Program – 480 South Democrat Road, Gibbstown, NJ ESNJ-KEY-GIBBSTOWN, LLC, BPU Docket Nos. QO19010068 & QO22030156, Order dated June 8, 2022 (“Gibbstown Order”).

¹⁴ Id. at 8-9.

¹⁵ Id. at 9-10.

¹⁶ In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17 – Order Granting Extensions to Public Entities Seeking an Incentive Pursuant to the Solar Transition Incentive Program, BPU Docket No. QO19010068, Order dated August 17, 2022 (“Public Entity 2022 Order”).

¹⁷ In re New Jersey Solar Transition Pursuant to P.L. 2018, c.17, BPU Docket No. QO19010068, Order dated August 17, 2022 (“August 17 Denial Order”).

On November 9, 2022, the Board issued a second order denying multiple petitions for extension in the TI Program. The Board found that, while the projects were at varying stages of development, they all shared a failure to satisfy the completion milestones of the TI Program.¹⁸ Petitioners were encouraged to withdraw their TI registration and submit a registration in the ADI Program if the petitioners found that they could not complete the projects by the existing TI Program deadlines.¹⁹ Accordingly, the Board waived for these projects the ADI Program rule enumerated at N.J.A.C. 14:8-11.4(b) that prohibits projects from commencing construction without first obtaining a notice of conditional registration in the program.²⁰

On September 18, 2023, the Board issued a third Order denying seventeen (17) petitions and approving one (1) petition in part for extension in the TI Program.²¹ Again, the Board found that the rationales provided by petitioners did not constitute good cause to waive the Board's rule and encouraged the petitioners to register in the ADI Program.

PETITIONS

Greenskies Clean Energy LLC, Ramsey Board of Education – Docket No. QO23080570

On August 17, 2023, Greenskies filed a petition with the Board seeking a sixty (60)-day extension beyond the project deadline of August 18, 2023 in the TI Program. The 215.6 kW project was located on the rooftop of the Ramsey Board of Education in Ramsey, New Jersey and had been conditionally accepted into the TI Program on August 18, 2021, with a completion deadline of August 18, 2022 (TI Program number NJSTRE1547434721). Per the Public Entity 2022 Order, Greenskies received two (2) six (6)-month extensions, with a new TI Program deadline of August 18, 2023. According to the petition, at the time of filing, the project was mechanically complete and inspected but had not received PTO from its EDC, Rockland Electric Company ("RECO"). Greenskies stated that the deadline could not be met due to inconsistent and often lengthy delays associated with receiving PTO and requested a brief extension for the amount of time needed to receive PTO and submit the post-construction package. Greenskies claimed that its situation is analogous to that of the project granted an extension in the Gibbstown Order because of interconnection delays. On February 28, 2024, Greenskies filed a supplement to its petition ("Ramsey Supplement") alleging delays in municipal approvals as another reason for the delay in its receipt of PTO. Greenskies' stated objective in filing this supplement was to provide the dates on which it had achieved various installation milestones. Greenskies received PTO from RECO on August 25, 2023, one (1) week after its extended deadline.

Greenskies Clean Energy LLC, Sayreville Schools – Docket No. QO23090643

On September 8, 2023, Greenskies filed a petition seeking a sixty (60)-day extension beyond the project deadline for five (5) projects in the TI Program, located on rooftops and carports of public schools in Sayreville, New Jersey. Four (4) of the projects were conditionally accepted into the

¹⁸ In re New Jersey Solar Transition Pursuant to P.L. 2018, c.17, BPU Docket No. QO19010068, Order dated November 9, 2022 ("November 9 Order").

¹⁹ Id. at 45.

²⁰ Ibid.

²¹ In re New Jersey Solar Transition Pursuant to P.L. 2018, c.17, BPU Docket No. QO19010068, Order dated September 18, 2023 ("September 18 Order").

TI Program on September 9, 2021 and one (1) on September 13, 2021 with an initial deadline of September 9, 2022 or September 13, 2022, depending upon the project registration number. Petition at Appendix A. Per the Public Entity 2022 Order, Greenskies received two (2) six (6)-month extensions for each of the five (5) projects, resulting in a new deadline of September 9, 2023 or September 13, 2023, depending upon the project registration number. According to the petition, at the time of filing, the projects were mechanically complete and inspected but had not received PTO from its EDC, Jersey Central Power & Light Company ("JCP&L"). Greenskies stated that the deadlines could not be met due to inconsistent and often lengthy delays associated with receiving PTO and requested a brief extension for the amount of time needed to receive PTO and submit the post-construction packages. Greenskies claimed its situation is analogous to that of the project which received an extension in the Gibbstown Order for interconnection delays. On February 29, 2024, Greenskies filed a supplement to its petition ("Sayreville Supplement") alleging delays in municipal approvals as another reason for the delay in its receipt of PTO.²² Greenskies received PTO for the projects at Sayreville Schools on various dates, all of which fell after its extended deadline.²³

Onyx Renewable Partners, Preakness Healthcare Center – Docket No. QO23120877

In a petition dated November 30, 2023, Onyx requested an extension of fourteen (14) days or less following any Board order granting its requested extension. The project consists of two (2) solar arrays at the Preakness Healthcare Center located at 303-305 Oldham Road, Passaic, New Jersey. The two (2) arrays are a 724.68 kW ground-mounted array, TI Program number NJSTRE1546695017 ("Ground-Mounted Array"), and a 277.50 kW roof-mounted array, TI Program number NJSTRE1546695223, ("Roof-Mounted Array"). The Ground-Mounted Array was accepted into the program on March 10, 2021 and the Roof-Mounted Array on March 11, 2021. Pursuant to the June 2021 Order, the initial deadlines for the two (2) projects were extended to September 2022. Per the Public Entity 2022 Order, the projects received two (2) additional six (6)-month extensions with new project deadlines of September 11, 2023 (Ground-Mounted Array) and September 10, 2023 (Roof-Mounted Array). According to the petition, both arrays received PTO and submitted post-construction certification packages approximately three (3) weeks prior to the TI Program expiration dates.²⁴ Onyx stated that following submission, the TI Program Administrator, identified certain administrative deficiencies in the post-construction certification packages.²⁵ In fact, these deficiencies were substantive in nature.²⁶ TRC advised Onyx of these deficiencies in emails on August 25, 2023 and September 8, 2023. See Attachment A. However, Onyx did not learn of the deficiencies identified by TRC because the notices of deficiencies were sent by TRC to an inactive email address for an employee that no longer worked for Onyx. Onyx further stated that the deficiencies identified by TRC were administrative in nature and did not affect the design or commercial operation of the projects.

²² Ibid.

²³ NJSTRE1547531882 – September 11, 2023; NJSTRE1547531896 – September 11, 2023; NJSTRE1547531929 – September 18, 2023; NJSTRE1547533003 – September 20, 2023; NJSTRE1547531914 – September 11, 2023. Supplement at Table 1.

²⁴ Petition at pars. 22-23.

²⁵ TRC is the program administrator for the TI program and the SuSI program, which includes the ADI program.

²⁶ TRC's deficiency letters identified missing technical worksheets, missing meter information, and a request to resubmit site map with modifications.

Standard, Paterson Public School Projects – Docket No. QO23080609

On August 23, 2023, Standard filed a petition for “an Order (i) reinstating solar projects under development for five public schools in the City of Paterson, into the TI Program (“Paterson Projects”); (ii) authorizing the Paterson Projects to receive the incentives and other benefits available to public entities approved to participate in the TI Program, (iii) granting a 6-month extension of the commercial operation deadline for each of the Projects in accordance with the Board’s August 17, 2022 Public Entities Extension Order, Docket No. QO19010068 (“Extension Order”); and (iv) such other and further relief as the Board deems appropriate in the circumstances (“Standard Petition”).”²⁷ The projects in Standard’s petition are identified as the Paterson Projects, consisting of five (5) arrays located at Martin Luther King Jr. Middle School, Paterson School No. 6, Rosa L. Parks Arts High School, Paterson School No. 28, and the John F. Kennedy Educational Complex.²⁸ The Paterson Projects were conditionally accepted into the TI Program on July 9, 2021 and July 14, 2021 with project deadlines of July 9, 2022 and July 14, 2022. On May 24, 2022, Standard canceled each of its five (5) TI Program Paterson Projects, and on June 16, 2022, received notice for cancellation of the Paterson Projects from TI Program Administrator. On July 19, 2022 and July 27, 2022, Standard received notice from the ADI Program Administrator that the Paterson Projects had been accepted into the ADI Program.²⁹ The Paterson Projects received PTO through the ADI Program in mid-December of 2022.

Following issuance of the Public Entity 2022 Order Standard asked the TI Program Administrator to reinstate its registrations in the TI Program, pursued an administrative appeal, and ultimately submitted the petition under review, asserting that Standard would not have withdrawn its projects from the TI Program in May 2022 had it been aware that the Public Entity 2022 Order would issue or that it might otherwise have been able to obtain an extension in that program. Standard stated that the project delays for the Paterson Projects were attributed to construction, scheduling, permitting, and procurement delays, in addition to the deteriorated condition of Paterson School roofs, which required resurfacing and reinforcement to properly support the weight of the solar panels.³⁰

DISCUSSION AND FINDINGS

Pursuant to the TI Program rules, the petitioners must have commenced commercial operations on their projects and must have submitted a post-construction certification package prior to the expiration of its conditional registration to be eligible for incentives under the TI Program. N.J.A.C. 14:8-10.4. Petitioners requested that the Board waive its rules to extend the TI Program deadlines for their projects. Petitioners asserted that they had shown good cause for the Board to waive its rules for alleged interconnection delays, minor administrative issues, and unanticipated delays with construction, scheduling, permitting, and procurement, and grant an extension for these projects.

²⁷ Standard Petition at pg. 1.

²⁸ TI Program numbers NJSTRE1547241405, NJSTRE1547238792, NJSTRE1547241384, NJSTRE1547238437 and NJSTRE1547241423.

²⁹ The five projects were registered under SuSI Program numbers NJADRE1549524712, NJADRE1549524676, NJADRE1549524223, NJADRE1549523833, NJADRE1549523833, and NJADRE1551836970.

³⁰ Standard filed for confidential treatment of certain information contained in the Attachments to its petition, pursuant to the Board’s Open Public Records Act rules at N.J.A.C. 14:1-12. All references in this order are to the public version of the petition.

The Board's rules state that "[i]n special cases and for good cause shown, the Board may . . . relax or permit deviations from this chapter." N.J.A.C. 14:1-1.2(b). The rules go on to explain that "[t]he Board shall, in accordance with the general purposes and intent of its rules, waive section(s) of its rules if full compliance with the rule(s) would adversely affect the ratepayers of a utility or other regulated entity, the ability of said utility or other regulated entity to continue to render safe, adequate and proper service, or the interests of the general public." N.J.A.C. 14:1-1.2(b)(1). Thus, when faced with a petition seeking a waiver of the TI Program Rules and their timelines, the Board carefully reviews the facts and circumstances of each such petition to determine whether waiving the Board's rules is in the public interest. The Board must balance petitioners' interests as solar developers with the public's interest in timely completion of projects, the ratepayers' interest in controlling the cost of solar subsidies, and the State's interest in ensuring that incentive levels appropriately reflect the time period during which a project reaches commercial operation.

In implementing the orderly closure of the SRP and the establishment of a permanent Successor Solar program, the Board has been mindful of the need to maintain clear line-of-sight for developers to access solar incentives in order to ensure the ongoing health of the solar industry and the achievement of the State's vital clean energy goals. Thus, the TI Program opened on the day the SRP was closed, and remained open to new registrations while the Board considered the development of the Successor Program. Similarly, when the Board closed the TI Program to new registrants on August 27, 2021, it immediately opened registration to the ADI Program on August 28, 2021, again ensuring that developers continue to have uninterrupted access to solar incentives.

The Board is also cognizant of the Legislature's directives to the Board in both the CEA and the Act. When the Legislature, through the CEA, directed the Board to close the SRP upon reaching the 5.1% milestone, it instructed the Board to determine how to provide an orderly transition from the SRP to a new program, and to continually reduce the cost of achieving the State's solar energy goals. N.J.S.A. 48:3-87(d). Subsequently, through the Act, the Legislature again declared it critical that the State promote investment in new solar electric power generation facilities "with the least cost and the greatest benefit to consumers " N.J.S.A. 48:3-114.

In this legislative and regulatory context, the Board evaluates the instant petitions. Turning first to the Greenskies petitions, the Board notes that petitioner registered all of its projects, under both dockets identified in this order, in the closing days of the TI Program and with the knowledge that this program provided one (1) year to achieve commercial operation and did not provide for any extensions. While the Board has been a longstanding supporter of public entities in New Jersey and their efforts to reduce their energy footprint, the record in both of these matters reflects that, notwithstanding the lack of provision for any extensions in the TI Rules, Greenskies did in fact receive two (2) six (6)-month extensions pursuant to the Public Entity 2022 Order for its six (6) projects. Notwithstanding the additional twelve (12) months to complete, none of Greenskies' projects received PTO by their respective TI Program deadlines. Greenskies attributed its failure to meet the TI Program deadlines to a variety of factors but focused primarily on the EDCs' alleged failure to timely provide PTO. Petitioner argued that it should get an extension for the same reasons the Board granted a blanket extension in the June 2021 Order; it also points to the Gibbstown Order. Both attempts fail. Greenskies' arguments regarding the June 2021 Order ignore the specific factual and chronological context of the waiver granted - the Board found that the solar industry was still adjusting to the changes resulting from the Clean Energy Act and the impact of the COVID-19 crisis and it noted that the Successor Program, SuSI, had not yet launched. The Board additionally acknowledged the regulatory uncertainty resulting from the

pending launch of the SuSI Program and noted that the general purpose of the TI Rules and the timelines contained therein is to provide a smooth transition to the SuSI Program.³¹ As previously noted, Greenskies' projects had benefited from an extension twice the length of that granted in the June 2021 Order and, the opening of the SuSI Program had been announced prior to the registration of the subject projects in the TI Program.

Greenskies' attempt to analogize its circumstances to those that supported a waiver in the Gibbstown Order also lacks merit. In the Ramsey and Sayreville Supplements, Greenskies provides the dates on which it achieved various installation and interconnection milestones for the projects at issue, but these dates confirm that these projects did not achieve commercial operation by their deadlines. This failure does not satisfy the Gibbstown criteria as there were no utility upgrades involved; a request for a re-rating and time needed to install a bi-directional meter are not considered "upgrades." Moreover, the adjusted project completion timelines appear to have been due more to routine processing steps, including those for interconnection applications, than to upgrades identified as necessary by the utilities, as was the case in Gibbstown.³² General interconnection issues do not constitute a valid basis for an extension in this context. The Board has rejected such claims multiple times.³³ To qualify for an extension under Gibbstown, the Board requires that a developer be able to identify a utility statement that an upgrade is required and will be completed by a date certain and a subsequent change of that date. Thus, the Board rejects Greenskies' claim that the delays were entirely outside the control of Greenskies. Given this history, the Board views the request for a further extension of the TI Program deadlines as unjustified.

The Board **FINDS** that the Greenskies' projects were conditionally accepted in the TI Program as public entity projects in the closing days/weeks of the TI Program and the projects received two (2) six (6)-month extensions pursuant to the Public Entity 2022 Order. The Board **FINDS** that Greenskies was on notice of time limitations in the TI Rules at the time of its registrations and was on notice that the TI Rules do not provide for extensions.

Similarly, the two (2) projects identified in Onyx's petition, which had previously benefited from a six (6)-month extension under the June 2021 Order, received two (2) six (6)-month extensions pursuant to the Public Entity 2022 Order. In the Public Entity 2022 Order, the Board chose to create an opportunity for an extension when a project is a public entity. The Board recognized that the requirements for public contracting and permitting create unique challenges for public entities as well as the importance and unique benefits of promoting their participation in the solar program. The Board determined that these unique circumstances warranted granting public entities participating in the TI program the ability to apply for two (2) six (6)-month extensions. However, this extension was limited and not open-ended nor did it contemplate providing for additional time to meet deadlines in the TI Program due to administrative errors. An indefinite commitment to the current incentive levels for these projects would not be in the interest of the ratepayers.

The SuSI/TI Program Administrator reviewed the Onyx post-construction certification per its normal processing practices for the TI Program, which provide an applicant thirty (30) days to fix deficiencies with the final paperwork and also give the registrant a reminder two (2) weeks later if the deficiencies remain outstanding. Onyx acknowledges that it did not receive the notices of

³¹ June 2021 Order at 6.

³² Gibbstown Order at 8-9.

³³ August 17 Denial Order at 12; November 9 Order at 44; September 18 Order at 40.

deficiencies sent by the SuSI/TI Program Manager because these went to the inactive email address of the former employee who had submitted the initial registration packages. This indicates that Onyx failed to keep its contact information current in the SuSI/TI Program Administrator's records and database. Keeping such information current is the responsibility of the registrant, not of the SuSI/TI Program Administrator. In addition, the records of the SuSI/TI Program Administrator indicate that the deficiencies were also communicated to a representative of Passaic County, who was listed as the premise contact for the projects. Moreover, attachments to the petition acknowledge that there was email correspondence between the SuSI/TI Program Administrator and an Onyx intern regarding outstanding tasks in the paperwork prior to the deadline; however, this communication was not related to the deficiencies identified in the notices emailed by TRC on August 25, 2023, and on September 8, 2023. Nor is the Board persuaded by Petitioner's claim that the deficiencies in the post-construction certification package were merely "administrative in nature;" without reviewing complete final technical information about a project, the SuSI/TI Program Manager cannot ascertain that there are no outstanding technical issues with a project.

Onyx argued that its failure to receive notices of deficiency because these were sent to the email of an employee no longer with the company is analogous to the circumstances of another matter in which the Board granted an extension of time to file a registration in Pilot Year Two ("PY2") of the Community Solar Energy Pilot Program ("Pilot Program").³⁴ In the Pennsville Order, the petitioner stated that it had missed the TI registration date because the responsible project manager had been replaced, resulting in an inadvertent overlooking of the deadline. However, the bases for the Board's decision in the Pennsville Order do not apply to Onyx' situation. Pennsville rapidly recognized its error and filed its registration less than one (1) week after the deadline, while Onyx has admitted that the contact information for its former employee remained inaccurate for at least six months following his departure. In addition, the Board looked to the fact that the PY2 solicitation was only the second solicitation, whereas Onyx had already received extensions under two (2) separate Board orders. The Board also noted its strong support for the Pilot Program projects, which were helping to launch a new segment of New Jersey's solar industry; Onyx' projects, while estimable, seek incentives in a well-established incentive program. Finally, in the Pennsville Order, the Board relied on the fact that the circumstances were unique in that there was no possibility of future projects submitting initial registration packages in the Pilot Program. On the other hand, several petitions for extensions in the TI Program remain pending before the Board and the effect of the precedent created by granting an extension for an administrative error must be taken into account.

The Board **FINDS** that Onyx's projects benefitted from two (2) separate waivers of the TI Program's expiration rules. The Board **FINDS** that Onyx did not keep the contact information in its registration with the SuSI/TI Program Manager updated and that this failure to maintain its contact information resulted in its failure to receive notification that its post-construction certification package was deficient.

Turning to Standard's petition, the Board looks first at Standard's claim that it should receive the two (2) conditional six (6)-month extensions afforded to public entities with active TI registrations by the Public Entity 2022 Order. The petition acknowledges Standard's voluntary decision, three (3) months prior to the issuance of the Public Extension 2022 Order, to cancel its TI registrations and register in the ADI Program. However, Standard asserted that had it not withdrawn the

³⁴ In re Community Solar Energy Pilot Program Pennsville Landfill Solar, LLC - For Approval of an Extension of the Community Solar Energy Pilot Program Year 2 Deadline for Pennsville Landfill Solar Project (A) and (C), BPU Docket Nos. QO18060646 & QO21121248, Order dated March 9, 2022 ("Pennsville Order").

projects, they would have been eligible for the extension granted by the Public Entity 2022 Order.

Standard is mistaken. First, it had made a business decision to withdraw its projects and pursue them in the longer timeframe afforded by the ADI Program. The Board has no obligation to erase that business decision because Standard has now changed its mind. Second, the Public Entity 2022 Order made an extension available to projects “with solar projects currently registered in the TI Program”[.] Public Entity 2022 Order at 6. Standard’s projects were not “currently registered” because they had been withdrawn. However, even had these registrations not been withdrawn, they would have expired in July 2022, prior to the issuance of the Public Entity 2022 Order on August 17, 2022. In other words, these would not have been current registrations eligible for the relief afforded by the Public Entity 2022 Order regardless of the withdrawal.

Standard argued, however, that the Board is equitably estopped from denying it an extension. In support of this position, Standard stated that its decision to withdraw from the TI Program was based on the statements in its conditional acceptance letters and on the Board’s website that there were no extensions available in the TI Program and on Standard’s ignorance of the Board’s ability to waive its rules. In Standard’s opinion, when it contacted the SuSI/TI Program Administrator about its concern that it might miss its expiration dates in the TI Program, it would have been “appropriate” for the administrator to advise Standard that Board staff were considering an extension for public entities and/or that the Board’s rules allow the Board to consider requests for waivers of those rules.

This argument fails. First, the SuSI/TI Program Administrator was not at liberty to discuss internal policy discussions at the Board with an outside entity, or to reveal to one (1) solar developer information that was not available to all. The SuSI/TI Program Administrator is a contractor for the Board; it has no obligation to provide legal advice to Standard nor does TRC dictate policy. Second, at the time that Standard registered its projects in the TI Program in July 2021, the Board had already waived and extended the TI Program deadline twice.³⁵ Standard was apparently unaware of this history, but it had the option of seeking legal advice on its options if it so desired. It is the applicant’s responsibility to understand the rules governing the Board’s incentive programs and of making decisions for how to pursue its projects, not the SuSI/TI Program Administrator; Standard chose to withdraw the Paterson Projects from the TI Program and submit applications to the ADI Program.

The Board does not deny that the City of Paterson and its public schools are public entities, nor that the City of Paterson is an overburdened community and could benefit from additional support from the State, in general. However, the City of Paterson remains eligible for incentives for the installation of these projects through the ADI Program, under which they achieved commercial operation in mid-December of 2022.

As previously noted, the Board has consistently sought to provide a smooth transition to the ADI Program for projects already under development. Among other actions, the Board amended N.J.A.C. 14:8-11.4(b) to provide that a project that had an active TI registration will not be barred from the ADI Program by reason of having commenced commercial construction prior to acceptance into that program. The Paterson Projects, which were registered in the TI Program a month before it closed, have benefitted from the Board’s action; these systems were appropriately

³⁵ July 2020 Order; June 2021 Order.

transitioned from the TI Program to the ADI Program, under which they have received PTO.³⁶ The ADI incentives will provide meaningful incentives to Petitioner, while balancing costs to Ratepayers.

The Board **FINDS** that Standard does not merit further relief beyond what has been granted in previous Orders and therefore **DENIES** Petitioner's request for an extension under the TI Program. Thus, the Board **DIRECTS** the SuSI/TI Program Administrator to complete the processing of the post-construction certification packages for the Paterson Projects under the ADI Program.

The Board notes that the interim nature of the TI Program has been consistently communicated since the Program was first proposed in 2019. The TI Program rules do not provide for extensions, and that omission was intentional. Following careful review of the record, including filed petitions, supplements, and responses, the Board **FINDS** that full compliance with the rules in these matters furthers the interests of the State and the general public in maintaining an orderly transition from the TI Program to the SuSI Program and in reducing the cost of achieving the State's solar energy goals. The Board **FINDS** that petitioners have not shown good cause for the Board to waive its rules and grant an extension of the TI Program deadlines. Accordingly, the Board **HEREBY DENIES** the above petitions.

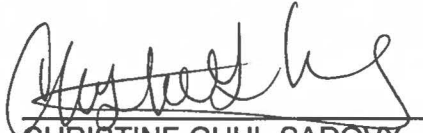
With respect to the petitions submitted by Greenskies and Onyx, the Board **FINDS** that facilitating the ability of petitioners' projects to participate in the ADI Program will benefit the registrants, the solar industry, and the interest of the general public in the furtherance of solar development. The receipt of PTO by the systems covered by these petitions prior to registration in the ADI Program shall not constitute a bar to eligibility. Provided that the projects contained with the petitions submitted by Greenskies and Onyx satisfy all other eligibility requirements and program rules, these projects shall be eligible for the ADI Program. The ADI incentives, including the public entity adder, will provide meaningful incentives to these petitioners and the public, while reducing the costs to Ratepayers.

³⁶ The post-construction certification packages for the ADI registrations have not been processed by the SuSI/TI Program Administrator, given the pendency of this petition.


The effective date of this Order is February 19, 2025.

DATED: February 12, 2025

BOARD OF PUBLIC UTILITIES
BY:


CHRISTINE GUHL-SADOVY
PRESIDENT


DR. ZENON CHRISTODOULOU
COMMISSIONER



MARIAN ABDOU
COMMISSIONER


MICHAEL BANGE
COMMISSIONER

ATTEST:


SHERRI L. LEWIS
BOARD 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 A NEW JERSEY SOLAR TRANSITION PURSUANT TO P.L. 2018, C.17
DOCKET NO. QO19010068

IN THE MATTER OF THE PETITION OF GREENSKIES CLEAN ENERGY LLC FOR EXTENSION OF THE SOLAR
TRANSITION INCENTIVE PROGRAM COMMERCIAL OPERATION DEADLINE FOR A MECHANICALLY
COMPLETE PROJECT - NJSTRE1547434721
DOCKET NO. QO23080570

IN THE MATTER OF THE PETITION OF GREENSKIES CLEAN ENERGY LLC FOR EXTENSION OF THE SOLAR
TRANSITION INCENTIVE PROGRAM COMMERCIAL OPERATION DEADLINE FOR MECHANICALLY COMPLETE
SOLAR PROJECTS AT SAYREVILLE SCHOOLS
DOCKET NO. QO23090643

IN THE MATTER OF THE VERIFIED PETITION OF STANDARD SOLAR, INC. FOR REINSTATEMENT OF THE
PATERSON PUBLIC SCHOOL SOLAR PROJECTS INTO THE TI PROGRAM AND FOR AN EXTENSION OF THE
PROJECTS' COMMERCIAL OPERATION DEADLINE DATE
DOCKET NO. QO23080609

IN THE MATTER OF THE VERIFIED PETITION OF ONYX RENEWABLE PARTNERS, L.P. FOR AN EXTENSION
OF TIME TO RESPOND TO ADMINISTRATIVE DEFICIENCIES IN A POST-CONSTRUCTION CERTIFICATION
PACKAGE AS IDENTIFIED BY THE SREC REGISTRATION PROGRAM
DOCKET NO. QO23120877

SERVICE LIST

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Aug-25 2023

Gregg Cousoulas
Onyx Development Group
230 Park Avenue
Suite 845
New York, NY 10169

TI Application Number: NJSTRE1546695017

NOTICE- Incomplete Final As-Built Packet 30 Day Notice

Pat Lepore
Passaic County Admin Bldg
303-305 Oldham Road
BLDG 4 (Preakness Hospital)
Passaic, NJ 07470

Dear Gregg Cousoulas:

This email is to inform you that we have received your Final As-Built (Post-Construction) packet for NJSTRE1546695017 and have found deficiencies based on the requirements listed on the Transition Incentive Program (TI) Final As-Built Checklist.

Per [Board Order](#) dated April 6, 2022, *the Board WAIVES N.J.A.C. 14:8- 10.4(f)(4){iii} and ORDERS that where the TI Program manager determines that a registrant's TI Program post-construction certification package was submitted on or before the project's expiration date and is incomplete or deficient, the TI Manager shall notify the registrant and provide the registrant with 30 days from the date of such notice to cure the post-construction certification package.*

This notification is to inform you that you have filed an incomplete TI Final As-Built (Post Construction) packet on or before the project's expiration date.

If the project's expiration date noted in the TI Acceptance letter is less than 30 days from the date of this notification, you now have **30-days from the date of this notification** to submit all the necessary documents to complete the Final As-Built packet. Projects that do not satisfy the TI Final As-Built requirements **within 30 days** from the date of this notification will be cancelled and will no longer be eligible to participate in the TI Program.

If the project's expiration date noted in the TI Acceptance letter is more than 30 days from the date of this notification, you are required to submit a complete Final As-Built packet on or before that expiration date.

All TI projects must obtain permission to operate (PTO) from the relevant Electric Distribution Company prior to the TI expiration date.

Please note: if you have previously been notified that your project's TI Final As-Built packet is incomplete, you may consider today's notification as the start of the 30-day period for submitting all necessary documents to complete the packet.

The Final-As Built packet is missing the following items:

- Missing As-Built Technical Worksheet,

-

Missing meter equipment information in the portal Revise the panel equipment information and confirm the orientation for each array - you can not have multiple orientations listed for the same array, it will need to be separated Resubmit the site map and indicate all the equipment information and layout that applies to only this project If the final as built tech sheet is signed electronically, please submit the corresponding audit report for all the electronic signatures.

Once the Final As-Built packet is deemed complete, you will be randomly selected for an on-site program inspection or selected for an inspection waiver. If you are selected for a waiver of inspection, you will receive a waiver letter via email. If you are selected for an on-site inspection, you will be contacted to schedule this on-site visit by a Program Representative.

If you have any questions, please contact njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey's Clean Energy Program™
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

CC:
Pat Lepore
Gregg Cousoulas



Sep-8 2023

Gregg Cousoulas
Onyx Development Group
230 Park Avenue
Suite 845
New York, NY 10169

Application Number: NJSTRE1546695017

NOTICE: Incomplete Final As-Built Packet-SECOND ATTEMPT

Pat Lepore
Passaic County Admin Bldg
303-305 Oldham Road
BLDG 4 (Preakness Hospital)
Passaic, NJ 07470

Dear Gregg Cousoulas:

This is our **Second Attempt** to notify you that we have received your Final As- Built (Post-Construction) packet for NJSTRE1546695017 and have found deficiencies based on the requirements listed on the TI Final As-Built Checklist.

The first notification was sent on 08/25/2023, and identified the deadline by which you are required to cure the incomplete Final As-Built packet. To date, no actions have been taken to address these deficiencies to complete the Final As -Built requirements.

Registrants that received the first notification less than 30 days from the project's expiration date noted in the TI Acceptance were granted 30 days from the notification to submit all the necessary documents to complete the Final As-Built packet. If the deficiencies are not addressed and a complete TI Final As-Built packet submitted in the online portal within the 30-Day grace period noted in the initial notification, the registration will be canceled, and you will no longer be eligible to participate in the TI Program. If the project's expiration date is more than 30 days from the date of the first notification, you are required to submit a complete Final As-Built packet on or before the expiration date noted in the TI Acceptance letter.

All TI projects must obtain permission to operate (PTO) from the relevant Electric Distribution Company prior to the TI expiration date.

Once the Final As-Built packet is deemed complete, you will be randomly selected for an on-site program inspection or selected for an inspection waiver. If you are selected for a waiver of inspection, you will receive a waiver letter via email. If you are selected for an on-site inspection, you will be contacted to schedule this on-site visit by a Program Representative.

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- Missing As-Built Technical Worksheet,

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If you have any questions, please contact njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey's Clean Energy Program™
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

CC:
Pat Lepore
Gregg Cousoulas



Sep-25 2023

Application Number: NJSTRE1546695017

NOTICE: TI Application Expired

Gregg Cousoulas
Onyx Development Group
230 Park Avenue
Suite 845
New York, NY 10169

Dear Gregg Cousoulas:

Your solar application NJSTRE1546695017 in the Transition Incentive Program (TI) has expired. An acceptance letter for a 724.6800 kW, Solar Electric System was issued on 03/11/2021. A complete Final As-Built packet is required to be submitted on or before the expiration date of 09/11/2023. We have made multiple attempts to notify you of the approaching expiration date for this application. We are taking this action since we have not received the completed Final As-Built packet within the required commitment timeframe.

Please reach out to your solar installer to determine the reason the final documents were never submitted in the TI online portal.

Your TI applications will now be deactivated in our system.

You may be eligible to participate in the Administratively Determined Incentive (ADI) Program. You can find more information on the ADI Program at njcleanenergy.com

If you have any questions, please contact us at njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey Clean Energy™
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

Cc:
Pat Lepore
Gregg Cousoulas



Aug-25 2023

Gregg Cousoulas
Onyx Development Group
230 Park Avenue, Suite 845
New York City
New York, NY 10169

TI Application Number: NJSTRE1546695223

NOTICE- Incomplete Final As-Built Packet 30 Day Notice

Pat Lepore
Passaic County Admin Bldg
303-305 Oldham Road
Preakness Hospital - BLDG 4
Passaic, NJ 07470

Dear Gregg Cousoulas:

This email is to inform you that we have received your Final As-Built (Post-Construction) packet for NJSTRE1546695223 and have found deficiencies based on the requirements listed on the Transition Incentive Program (TI) Final As-Built Checklist.

Per [Board Order](#) dated April 6, 2022, *the Board WAIVES N.J.A.C. 14:8- 10.4(f)(4){iii} and ORDERS that where the TI Program manager determines that a registrant's TI Program post-construction certification package was submitted on or before the project's expiration date and is incomplete or deficient, the TI Manager shall notify the registrant and provide the registrant with 30 days from the date of such notice to cure the post-construction certification package.*

This notification is to inform you that you have filed an incomplete TI Final As-Built (Post Construction) packet on or before the project's expiration date.

If the project's expiration date noted in the TI Acceptance letter is less than 30 days from the date of this notification, you now have **30-days from the date of this notification** to submit all the necessary documents to complete the Final As-Built packet. Projects that do not satisfy the TI Final As-Built requirements **within 30 days** from the date of this notification will be cancelled and will no longer be eligible to participate in the TI Program.

If the project's expiration date noted in the TI Acceptance letter is more than 30 days from the date of this notification, you are required to submit a complete Final As-Built packet on or before that expiration date.

All TI projects must obtain permission to operate (PTO) from the relevant Electric Distribution Company prior to the TI expiration date.

Please note: if you have previously been notified that your project's TI Final As-Built packet is incomplete, you may consider today's notification as the start of the 30-day period for submitting all necessary documents to complete the packet.

The Final-As Built packet is missing the following items:

- Missing As-Built Technical Worksheet,

-

Missing SREC meter equipment information in the portal Resubmit the site map and indicate all the equipment information and layout that applies to only this project If the final as built tech sheet is signed electronically, please submit the corresponding audit report for all the electronic signatures.

Once the Final As-Built packet is deemed complete, you will be randomly selected for an on-site program inspection or selected for an inspection waiver. If you are selected for a waiver of inspection, you will receive a waiver letter via email. If you are selected for an on-site inspection, you will be contacted to schedule this on-site visit by a Program Representative.

If you have any questions, please contact njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey's Clean Energy ProgramTM
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

CC:
Pat Lepore
Gregg Cousoulas



Sep-8 2023

Gregg Cousoulas
Onyx Development Group
230 Park Avenue, Suite 845
New York City
New York, NY 10169

Application Number: NJSTRE1546695223

NOTICE: Incomplete Final As-Built Packet-SECOND ATTEMPT

Pat Lepore
Passaic County Admin Bldg
303-305 Oldham Road
Preakness Hospital - BLDG 4
Passaic, NJ 07470

Dear Gregg Cousoulas:

This is our **Second Attempt** to notify you that we have received your Final As- Built (Post-Construction) packet for NJSTRE1546695223 and have found deficiencies based on the requirements listed on the TI Final As-Built Checklist.

The first notification was sent on 08/25/2023, and identified the deadline by which you are required to cure the incomplete Final As-Built packet. To date, no actions have been taken to address these deficiencies to complete the Final As -Built requirements.

Registrants that received the first notification less than 30 days from the project's expiration date noted in the TI Acceptance were granted 30 days from the notification to submit all the necessary documents to complete the Final As-Built packet. If the deficiencies are not addressed and a complete TI Final As-Built packet submitted in the online portal within the 30-Day grace period noted in the initial notification, the registration will be canceled, and you will no longer be eligible to participate in the TI Program. If the project's expiration date is more than 30 days from the date of the first notification, you are required to submit a complete Final As-Built packet on or before the expiration date noted in the TI Acceptance letter.

All TI projects must obtain permission to operate (PTO) from the relevant Electric Distribution Company prior to the TI expiration date.

Once the Final As-Built packet is deemed complete, you will be randomly selected for an on-site program inspection or selected for an inspection waiver. If you are selected for a waiver of inspection, you will receive a waiver letter via email. If you are selected for an on-site inspection, you will be contacted to schedule this on-site visit by a Program Representative.

The Final As-Built packet is missing the following items:

- Missing As-Built Technical Worksheet,

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Missing SREC meter equipment information in the portal Resubmit the site map and indicate all the equipment information and layout that applies to only this project If the final as built tech sheet is signed electronically, please submit the corresponding audit report for all the electronic signatures.

If you have any questions, please contact njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey's Clean Energy Program™
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

CC:
Pat Lepore
Gregg Cousoulas



Sep-25 2023

Application Number: NJSTRE1546695223

NOTICE: TI Application Expired

Gregg Cousoulas
Onyx Development Group
230 Park Avenue, Suite 845
New York City
New York, NY 10169

Dear Gregg Cousoulas:

Your solar application NJSTRE1546695223 in the Transition Incentive Program (TI) has expired. An acceptance letter for a 277.5000 kW, Solar Electric System was issued on 03/10/2021. A complete Final As-Built packet is required to be submitted on or before the expiration date of 09/10/2023. We have made multiple attempts to notify you of the approaching expiration date for this application. We are taking this action since we have not received the completed Final As-Built packet within the required commitment timeframe.

Please reach out to your solar installer to determine the reason the final documents were never submitted in the TI online portal.

Your TI applications will now be deactivated in our system.

You may be eligible to participate in the Administratively Determined Incentive (ADI) Program. You can find more information on the ADI Program at njcleanenergy.com

If you have any questions, please contact us at njreinfo@njcleanenergy.com.

Sincerely,

Transition Incentive Program
New Jersey Clean Energy™
c/o TRC
317 George Street, Suite #520
New Brunswick, NJ 08901

Cc:
Pat Lepore
Gregg Cousoulas