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Please reply to Trenton

April 16, 2020

Via E-Mail Only

Aida Camacho-Welch, Secretary
Board of Public Utilities
44 South Clinton Avenue
Trenton, NJ 08625-0350

**RE: Investigation of Resource Adequacy Alternatives, Dkt. EO20030203
REQUEST FOR EXTENSION OF COMMENT DUE DATE by EDF, P3,
AMERICAN WIND ENERGY ASSOCIATION, SOLAR ENERGY
INDUSTRIES ASSOCIATION, MID-ATLANTIC RENEWABLE ENERGY
COALITION, and ADVANCED ENERGY ECONOMY**

Dear Secretary Camacho-Welch:

This office represents the Environmental Defense Fund, Inc. (EDF).¹ EDF requests an extension for the April 29, 2020 comment due date set forth in the Secretary's notice dated March 27, 2020 of four weeks, which would make such comments due May 27, 2020. Please be advised that the PJM Power Providers ("P3"),² the American Wind Energy Association ("AWEA"),³ the Solar

¹ EDF is a New York corporation and operates as a non-profit membership organization whose mission is to preserve the natural systems on which all life depends. EDF has over 11,000 members in New Jersey. Guided by science and economics, EDF seeks practical solutions to resolve environmental problems. EDF uses the power of markets to achieve beneficial environmental outcomes, and consistent with its organizational purpose is engaged in activities to facilitate cost-effective and efficient energy market designs that encourage investment to modernize energy infrastructure and practices, and increase energy efficiency.

² P3 is a non-profit organization dedicated to advancing federal, state and regional policies that promote properly designed and well-functioning electricity markets in the PJM Interconnection, L.L.C. ("PJM") region. Combined, P3 members own approximately 65,000 MWs of generation assets and produce enough power to supply over 50 million homes. The P3 contact for this matter is Glen Thomas, GT Power Group 101 Lindenwood Drive, Suite 225, Malvern, PA 19355; gthomas@gtpowergroup.com, 610-768-8080.

³ AWEA is a national trade association representing a broad range of entities with a common interest in encouraging the expansion and facilitation of wind energy resources in the United States. The AWEA contacts for this matter are Sari Fink (sfink@awea.org) and Gabe Tabak (gtabak@awea.org).

Energy Industries Association (“SEIA”),⁴ the Mid-Atlantic Renewable Energy Coalition (“MAREC”),⁵ and Advanced Energy Economy (“AEE”)⁶ join EDF in this request. Under this request, the extension would apply to all commenters.

The Secretary’s notice requests comments involving numerous novel and complex issues. The specific questions proposed by the Board require thoughtful responses that cannot thoroughly be compiled under the current timeline. In addition, the process of developing a thoughtful response to such a complex matter is slowed for all organizations due to safeguards and procedures all must follow to maintain safety and health during this unprecedented COVID-19 crisis. When combined with the intricacy of the questions posed, these circumstances encroach upon the parties’ ability to meet the April 29, 2020 deadline. The requested extension is necessary for the parties to complete their work in the face of the current disruptions.

We further suggest that by granting this request the BPU will likely receive comments of better quality which will in the long range likely improve the efficiency and quality of processes in this docket.

For these reasons, EDF, P3, AWEA, SEIA, MAREC, and AEE request an extension until May 27, 2020 for all parties to file written comments in this matter.

Sincerely,



Martin C. Rothfelder

cc:

Graham, Karriemah (BPU)

Paul Flanagan (BPU)

Robert Brabston (BPU)

Stacy Peterson (BPU)

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⁴ SEIA is the national trade association of the solar energy industry. As the voice of the industry, SEIA works to support solar as it becomes a mainstream and significant energy source by expanding markets, reducing costs and increasing reliability, removing market barriers, and providing education on the benefits of solar energy. The SEIA contacts for this matter are Katherine Gensler (kgensler@seia.org), Dave Gahl (dgahl@seia.org), and Gizelle Wray (gwrays@seia.org).

⁵ MAREC is a coalition of wind energy companies, solar companies, wind turbine manufacturers and public interest organizations dedicated to promoting the growth and development of renewable energy in the Mid-Atlantic region. The MAREC contact for this matter is Bruce Burcat (marec.org@gmail.com).

⁶ AEE is a national organization of businesses making the energy we use secure, clean, and affordable. AEE represents more than 100 companies and organizations that span the advanced energy industry and its value chains. Technologies that we consider advanced energy include energy efficiency, demand response, solar, wind, storage, electric vehicles, advanced metering infrastructure, transmission and distribution efficiency, fuel cells, hydro power, nuclear power, combined heat and power, and enabling software. The AEE contact for this proceeding is Jeff Dennis (jdennis@aeenet.net).

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