



Comments of IGS Solar on New Jersey Solar Transition Staff Straw Proposal

March 1, 2019

IGS Solar appreciates the opportunity to provide comment on the New Jersey Solar Transition Staff Straw Proposal ('Staff Straw') issued on December 26, 2018. We have worked with the Solar Energy Industries Association and the New Jersey Solar Energy Coalition on their comments and generally support the solutions in their joint comments. We take this opportunity to provide additional comment on question #8: In the SREC Successor Program, should the Board provide differentiated SREC or solar value incentives to different types of projects? Should such differentiated SREC compensation be created through SREC multipliers, through an add-on valuation, or through some other method? Based on what factor(s) should any SREC compensation be differentiated.

We agree with the SEIA/NJSEC recommendation that the Board use SREC factors to differentiate incentive payment between project types. However, based on experience in New Jersey, Massachusetts, and Illinois among others, we believe the Board also needs to implement additional guardrails on program capacity to encourage project diversity. We recommend differentiating program capacity between systems that are in the built environment (e.g. rooftop, carports, parcels adjacent to load being served) and those that are built on open space. Within those two broad categories, differentiation can be made based on public policy objectives and differences in business cadences. For example, in the built environment segment, capacity can be set aside for residential and very small commercial systems whose shorter project development cycle requires them to have smooth and even access to the incentive program. In the open space category, differentiations could be made for systems built on greenfields and those built on landfills or brownfields among others.

Thank you again for the opportunity to provide comment. We look forward to continuing to be an active participant in the Stakeholder process.

Sincerely,

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