Agenda Date: 7/19/13
Agenda Item: 8D

STATE OF NEW JERSEY

Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

		CLEAN ENERGY
	)	ORDER
	)	
IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C. 24, THE SOLAR ACT OF 2012	)	DOCKET NO. EO12090832V
	)	
IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C. 24 (Q)(R)(S) PROCEEDINGS TO ESTABLISH THE PROCESSES FOR DESIGNATING CERTAIN GRID SUPPLY PROJECTS AS CONNECTED TO THE DISTRIBUTION SYSTEM – REQUEST FOR APPROVAL OF GRID SUPPLY SOLAR ELECTRIC POWER GENERATION PURSUANT TO SUBSECTION (S)	)	DOCKET NO. EO12090880V
	)	
MORRIS COUNTY IMPROVEMENT AUTHORITY AND SOMERSET COUNTY IMPROVEMENT AUTHORITY MOTION FOR RECONSIDERATION	)	DOCKET NOs. EO12121089V - EO12121144V and EO13040331V

Party of Record:

Stephen B. Pearlman, Esq., on behalf of the Morris County Improvement Authority and the Somerset County Improvement Authority

BY THE BOARD:

The Morris County Improvement Authority and the Somerset County Improvement Authority (the "IAs") have moved for reconsideration of the Board's Orders in the above-captioned matters, issued May 8, 2013 and May 10, 2013 ("May 8 Order" and "May 10 Order") arguing that the Board used the wrong legal standard when determining whether applicants should be approved as "connected to the distribution system" pursuant to L. 2012, c. 24, sec. 3 ("Solar Act"), codified as N.J.S.A. 48:3-87 (s) ("Subsection s").

BACKGROUND

As described in more detail in the May 8 and May 10 Orders, the Solar Act, a bi-partisan effort to stabilize the solar market, was signed into law by Governor Chris Christie on July 23, 2012,

and took effect immediately. The law amends N.J.S.A. 48:3-51 and N.J.S.A. 48:3-87, provisions of the Electric Discount and Energy Competition Act ("EDECA"), which requires, among other things, that retail sellers of electricity comply with the State's renewable portfolio standards ("RPS"). The RPS encourage the production of renewable energy.

Prior to the Solar Act, whether solar generated electricity could be the basis for an Solar renewable energy Certificates (SRECs) usable for RPS compliance depended on meeting the requirements of N.J.A.C. 14:8-2, including but not limited to pre-registration through N.J.A.C. 14:8-2.4, which is commonly referred to as the SREC Registration Program ("SRP"). One of the RPS requirements is that the energy be generated at a facility issued a Certification Number through the Board's registration process. See N.J.A.C. 14:8-2.4(a). The registration process includes an application and review process to determine whether a solar facility meets SREC eligibility requirements. N.J.A.C. 14:8-2.4(f). After review is completed, and provided that SREC eligibility requirements are satisfied, the facility is issued a conditional registration. The notice of conditional registration, also known as the SRP acceptance letter, which includes an expiration date twelve months from its issuance, states that if the solar facility is constructed, which meets all program eligibility requirements including compliance with all federal, state, and local laws, a Certification Number will be issued for the solar facility upon completion of construction, submission of a final as-built package, and inspection. N.J.A.C. 14:8-2.4(f)(4)(i) and (ii).

Following conditional registration, construction of the solar facility could begin, and the facility must be completed prior to the registration expiration date, although one extension is allowed. See N.J.A.C. 14:8-2.4(f)(5) and (g). It is not until after the facility owner submits a post-construction certification package that includes a copy of the approval from either the relevant electric distribution company ("EDC") or PJM Interconnection, L.L.C. ("PJM") to interconnect and energize the facility, and after inspection of the facility or waiver of inspection per N.J.A.C. 14:8-2.4(i) and (k), that a Certification Number is assigned to the facility for use in obtaining SRECs from PJM-Environmental Information Services Generation Attribute Tracking System ("PJM-EIS GATS"). N.J.A.C. 14:8-2.4(l). See N.J.A.C. 14:8-2.2 (definition of "Generation Attribute Tracking System").

The Solar Act adds requirements that are not in the SRP for Board approval or designation of certain projects as being "connected to the distribution system" in order to earn SRECs. Subsection s applies to land actively devoted to agricultural or horticultural use that is valued, assessed, and taxed pursuant to the Farmland Assessment Act of 1964, N.J.S.A. 54:4-23.1 to -23.24, at any time within the 10 year period prior to the effective date of the Solar Act ("farmland"). Under Subsection s, a solar electric power generation facility on qualifying farmland that is not net-metered or an onsite generation facility (that is, the electricity is not being used to satisfy the electrical needs of structures on or adjacent to the land where the solar facility is located) is subject to a review process by the Board to determine whether the proposed project should be approved as connected to the distribution system and therefore eligible to earn SRECs. N.J.S.A. 48:3-87(s)(2). This is incremental to satisfaction of the Board's SREC Registration Program ("SRP") process.

After notice, a public hearing, and opportunity for oral and written comments, on November 30, 2012, Board Staff distributed the Subsection s(2) application via mass email distribution to renewable energy stakeholders, and posted the application form on its webpage and on the webpage of the New Jersey Clean Energy Program. Any company applying for eligibility for SRECs under N.J.S.A. 48:3-87(s)(2) was required to submit a completed application package

by December 17, 2012. The application required responding to twenty-seven questions, all, as noted in the May 10 Order "designed specifically to aid Staff in making a recommendation to the Board as to which proposed projects should be approved[.]" May 10 Order at 12-14.

As noted in the May 10 Order, Staff reviewed a total of fifty-seven applications and ranked them according to the extent of each application's progress toward completion.[1] The goal was to use the most objective standard possible—progress toward construction completion. The key criteria utilized by Staff to judge project progress included the application submissions regarding project completion status, anticipated completion date, pictures of any completed construction, and percentage of funding expended. Based on these criteria and on its field inspections of the twelve projects which Staff determined were most advanced on the basis of the criteria, Staff recommended for approval and the Board approved three applications. In re the Implementation of L. 2012, c. 24, N.J.S.A. 48:3-87(q)(r)(s), Proceedings to Establish the Processes for Designating Certain Grid-Supply Projects as Connected to the Distribution System, Approval of Application for SunPerfect, Inc., W1-132, Approval of Application for OCI Solar Power, LLC, W1-112, Approval of Application for NJ Clean Energy Ventures, W2-056, Dkt Nos. EO12090880V, EO12121101V, EO12121106V, EO12121142V (May 8, 2013).

Staff also considered whether a project had obtained all final, non-appealable local, state, and federal approvals and permits. Question number two on the application asked explicitly whether approvals had been obtained and read as follows:

> Have all final unappealable federal, state, regional and local approvals been secured? Yes or no: _____.

Staff considered the possession of these approvals as a strong indicator that completion was likely as a solar project cannot lawfully be constructed without all of these approvals. When the applications which Staff was not recommending for immediate approval were reviewed using this criterion as a bright line, Staff recommended, and the Board approved, deferral of final decision for twenty of the fifty-seven projects, with final determinations to be made following development of additional evaluation criteria and submission of additional information. May 10 Order at 50, 57.

Thirty-four projects remained. Seven projects failed to meet the minimum statutory criteria and were denied on that basis. Finally, Staff determined that the remaining twenty-seven applications were neither substantially completed nor had received all final, non-appealable approvals and permits. Staff recommended that these applications be denied and the Board did so.

The IAs, representing Morris and Somerset Counties, are among the stakeholders submitting comments to the Board in regards to proposed grid supply projects in the State after passage of the Solar Act. See November, 15, 2012, letter from Inglesino, Pearlman, Wyciskala & Taylor, LLC on behalf of the IAs. Both counties have provided financing through bonds for 26 megawatts of net-metered solar energy projects, and in their comments thoroughly detailed their dependency on a stable SREC market to make these projects cost-effective. Ibid. They further claim that any grid-supply project approvals would cause the trading value of an already over-supplied SREC market to further decrease. Ibid. Thus, the IAs advised the Board to be very

[1] "Completion" includes all the activities required in developing a project, including but not limited to construction.

stringent when considering grid-supply project applications, and to strictly adhere to the Energy Master Plan's (the "EMP") preference for net-metered projects pursuant to N.J.S.A. 52:27F-15. The Board noted the IAs comments in its May 8 Order, and advised that the Board awards under Subsection s were based upon "the most objective standard possible: progress toward construction completion. Receipt of all federal, state and local approvals has also been deemed relevant to determining the status of a project." See May 8 Order at 8.

MOTION FOR RECONSIDERATION

On May 23, 2013, the IAs filed a Letter Brief in support of their Motion for Reconsideration of the Board's May 8, 2013 and May 10, 2013 Orders ("IA Brief"). The IAs generally request that the Board reconsider its findings in the May Orders as failing to give adequate weight to the Energy Master Plan ("EMP"), failing to implement the EMP to the "maximum extent practicable and feasible," and for failing to address policies under N.J.S.A. 48:3-87(r) ("Subsection r"). IA Brief at 1-2.

First, the IAs argue that the Board failed to adhere to the dictates of N.J.S.A. 52:27F-15 when reviewing Subsection s applications, i.e. that all of its decisions must implement the EMP "to the maximum extent practicable and feasible." See IA Brief at 3-6. The IAs further maintain that the EMP articulates a clear preference for net metered projects and strongly discourages farmland projects. Id. at 4. Thus, all Subsection s applicants that began developing farmland projects after the issuance of the draft EMP did so "at their own risk," and any claim by the applicants that they should be awarded SREC status based on project expenditures is irrelevant because their projects are statutorily disfavored. Ibid. The IAs further claim that the Board never directly addressed this concern when responding to their comments, and the Board only noted that it would take action under the Solar Act "keeping in mind" the provisions of the EMP. Id. at 3-4. Thus, the Board was effectively creating a balancing test whereby it weighed the need to offset SREC market volatility with the concomitant need for additional market participation, a test which the IAs argue is in complete contravention to the mandates of the EMP. Id. at 4-5. The IAs claim that the Board is thus statutorily required to change its standard of review, and implement the EMP to the "maximum extent practicable and feasible" when reviewing each application. Id. at 5. The IAs assert that utilizing this standard of review will lead to an "unambiguous result," and that all twenty-one (21) applications which were previously deferred will be summarily rejected by the Board. Id. at 6.

Second, the IAs argue that the criteria cited in the May 8 order are "unreasonable, unlawful, and not conclusive, and thus creates additional uncertainty, adding to the volatility of the SREC market and undermining the intent of the Solar Act." Id. at 6-8. The IAs note that the Board recognizes that the SREC market is oversupplied and the Solar Act was passed to provide stability to the New Jersey SREC market, and claim the May 8 order makes clear that the Board's approval of projects "as connected to the distribution system" is limited to projects that would not cause further volatility in the New Jersey solar market. Id. at 6. However, the IAs further argue that the Board contributed to this market volatility by adding construction completion as its key approval criterion. Id. at 7. More specifically, the IAs claim that the Board's deferral of twenty-one (21) projects totaling 230 MW creates uncertainty in the SREC market and will have an immediate economic impact on net-metered projects (i.e., those statutorily preferred by the EMP). Ibid. Finally, the IAs assert that the Solar Act created Subsection q to permit grid-supply developers to continue development of their projects without creating market uncertainty. Ibid. Therefore, the IAs demand that the Board reject the

remaining projects as "expeditiously as possible" to create certainty and be in line with the intent of Solar Act. Ibid.

Additionally, the IAs argue that the Board erred by not clarifying the review process under Section (r) in the May 8 and May 10 Orders, further adding to the uncertainty and volatility in the SREC market. See IA Brief at 8. The IAs note that while the Board has stated in several stakeholder meetings that grid-supply projects are not eligible to apply under Subsection r until Energy Year 2017, the Board has erred by not putting this time frame in writing in either of its Orders on the Subsection s applications. The IAs claim there are nearly 290 MW of solar projects that could potentially fall under Subsection r, and the Board's lack of written clarification of the start date for review of these projects contributes to volatility and uncertainty in the SREC market at large. Ibid.

DISCUSSION AND FINDINGS

Following review, the Board **FINDS** that nothing in the IAs' request requires the Board to modify or otherwise reconsider its decisions in the May 8 and May 10 Orders. Generally, a party should not seek reconsideration merely based upon dissatisfaction with a decision. D'Atria v. D'Atria, 242 N.J. Super. 392, 401 (Ch. Div. 1990). Rather, reconsideration is reserved for those cases where (1) the decision is based upon a "palpably incorrect or irrational basis;" or (2) it is obvious that the finder of fact did not consider, or failed to appreciate, the significance of probative, competent evidence. E.g., Cummings v. Bahr, 295 N.J. Super. 374, 384 (App. Div. 1996). The moving party must show that the action was arbitrary, capricious or unreasonable. D'Atria, supra, 242 N.J. Super. at 401.

N.J.A.C. 14:1-8.6 requires that a request for rehearing or reconsideration be done by a motion that enumerates the alleged errors of law or fact, and where an opportunity is sought to introduce additional evidence, that evidence shall be stated briefly with the reasons for failing to provide it previously. The IAs' motion does not conform to this rule because it only argues that the Board made an incorrect policy determination, not that the Board incorrectly interpreted Subsection s or made a factual error when considering any of the grid supply project applications. The Board will not modify an Order in the absence of a showing that the Board's action constituted an injustice or that the Board misunderstood or failed to take note of a significant element of fact or law. Here, the Board does not find that the issues raised by the IAs are sufficient to warrant reconsideration or modification.

While a significant element of the request renews the arguments made by the IAs in their November 15, 2012 comments seeking to have the Board reject all Subsection s applications, the Board has considered each of the arguments. The Board is mindful that its decisions have a public policy impact. It is in the nature of evolving energy policy that situations require evaluation and revaluation. Under these circumstances, the Board has considered the IAs' positions whether or not the arguments fall strictly under the standards for reconsideration. In so ruling, however, the Board emphasizes that it is not legally compelled to reconsider mere re-arguments, but rather it has exercised its discretion to consider all of the arguments on the merits.

The IAs' request for reconsideration fails to provide new facts or a legal basis which would justify the Board reversing its decision. The IAs base their entire claim on a subjective interpretation of the EMP and of the legislative intent of the Solar Act. Relying almost exclusively on three paragraphs of the EMP (a nearly 150 page document), the IAs claim that

the section heading "Promoting Solar PV Installations that Provide Economic and Environmental Benefit by Limiting SREC Eligibility" indicates a categorical rejection of any grid-supply project developed on farmland. See 2011 New Jersey Energy Master Plan, December 6, 2011 at 106-107. But the IAs fail to acknowledge that in that very same passage, the EMP states that the "BPU should be provided with the review and certification authority for such projects to ensure compatibility with land use, environmental, and energy policies." Id. at 107. Therefore, although the EMP states a general preference to limit grid supply solar development projects on farmland, it also recognizes that the Board needs to have the discretion to balance competing policy goals, and be able to approve such projects when they are compatible with broader energy, environmental and land use policies. The Board did just that, and adhered to this principle by using "construction completion" as a limiting criterion, and only approving three projects that were ready or almost ready to begin commercial operations, and deferring others that had already received all State and local approvals needed to begin construction. Those projects will be subject to continued review to determine viability. As stated in the May 10 Order, that process will be open and public, and will continue to provide information to the solar community and the SREC market.

Subsection s plainly states that a grid supply project "shall only be considered 'connected to the distribution system' if the facility has been approved as 'connected to the distribution system' by the board." N.J.S.A. 48:3-87(s). Thus, the legislature intended to allow the Board to approve some grid supply projects on farmland, because to construe the statutory language otherwise would make it "inoperative, superfluous, or meaningless," a practice which is "to be avoided." N.J. Carpenters Apprentice Training & Educ. Fund v. Borough of Kenilworth, 147 N.J. 171, 179-180. (1996).

Moreover, the IAs claim that the Board did not consider the EMP to the "maximum extent practicable and feasible" because doing so would make market volatility the Board's sole concern and thus lead to the denial of all deferred projects. However, Subsection s already makes clear the threshold requirements for approving a grid supply project: that PJM issued a System Impact Study for the facility on or before June 30, 2011 and that the facility files a notice with the Board within 60 days of the effective date of the Solar Act. N.J.S.A. 48:3-87(s)(2), and then commits the approval of the project to the discretion of the Board. The Solar Act incorporates the EMP's preference for net-metered projects by defining those projects as "connected to the distribution system" in N.J.S.A. 48:3-51, while requiring that most grid supply projects be subject to a Board approval process. With regard to proposed grid supply projects on farmland, if the legislature wanted to add more threshold requirements for Subsection s approval, it clearly could have done so. Unlike the evaluation of proposed projects under N.J.S.A. 48:3-87(r), the legislature left development of the additional criteria to the Board. The Board determined, per its discretion in approving projects, that the stage of development of new grid supply projects must be taken into account in the approval process, and it did not altogether discount market volatility because it used "construction completion" as a limiting criterion for approval.

Although the Board fully acknowledges the importance of clarifying Subsection r requirements, that is not the subject of its May 8 and May 10 Orders. The Board limited its May 8 and May 10 Orders to the matters before it -- whether or not to approve the 57 Subsection s project applications for designation as "connected to the distribution system" to qualify for SRECs. The Board has been informed that Staff has begun the stakeholder process that will develop the procedures to be incorporated into rules for projects seeking designation under Subsection r. The IAs are welcome to participate fully in that proceeding.

The Board has reviewed the motion for reconsideration, the supporting documentation, and Staff's prior recommendation. The Board **FINDS** that it acted within its statutorily granted discretion to approve or deny Subsection s applications pursuant to the criteria developed by Board Staff with the goal of determining the likelihood of construction completion and thereby reduce uncertainty in the solar market. Notwithstanding the IAs' claim that Morris and Somerset Counties may suffer economic hardship if volatility continues in the SREC market and therefore all grid supply applications should be rejected, the Board must consider a broader statewide policy for solar market development, as well as implications for individual project development, and properly did so when reviewing applications pursuant to the May 8 and May 10 Orders.

Accordingly, the Board **HEREBY DENIES** the IAs' request that the Board modify the May 8 and May 10 Orders and deny all applications which the Board has previously deferred.

DATED: 7/19/13

BOARD OF PUBLIC UTILITIES
BY:

ROBERT M. HANNA
PRESIDENT

JEANNE M. FOX
COMMISSIONER

JOSEPH L. FIORDALISO
COMMISSIONER

MARY-ANNA HOLDEN
COMMISSIONER

DIANNE SOLOMON
COMMISSIONER

ATTEST:

KRISTI IZZO
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 THE IMPLEMENTATION OF L. 2012, C. 24, THE SOLAR ACT OF 2012 - DOCKET NO. EO12090832V

IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C. 24 (Q)(R)(S) PROCEEDINGS TO ESTABLISH THE PROCESSES FOR DESIGNATING CERTAIN GRID SUPPLY PROJECTS AS CONNECTED TO THE DISTRIBUTION SYSTEM – REQUEST FOR APPROVAL OF GRID SUPPLY SOLAR ELECTRIC POWER GENERATION PURSUANT TO SUBSECTION (S) - DOCKET NO. EO12090880V

MORRIS COUNTY IMPROVEMENT AUTHORITY AND SOMERSET COUNTY IMPROVEMENT AUTHORITY MOTIONS FOR RECONSIDERATION - DOCKET NOs. EO12121089V - EO12121144V and EO13040331V

SERVICE LIST

Stefanie A. Brand, Esq., Director
Division of Rate Counsel
140 East Front Street 4th Floor
Post Office Box 003
Trenton, N.J. 08625-003
sbrand@rpa.state.nj.us

Stephen B. Pearlman, Esq.
Inglesino Pearlman Wyciskala & Taylor LLC
Morris County & Somerset County
600 Parsippany Road
Parsippany, N 07054
spearlman@iandplaw.com

J. Ferd Convery III, Esq.,
Clifford Chapman
Syncarpha Ty, LLC
645 Madison Avenue, 14th Floor
New York, NY 10022
cliff@synarpha.com

Brent Beerley, Manager
Community Energy, Inc.
Three Radnor Corporate Center, Suite 300
100 Matsonford Road
Radnor, PA 19087
bbeerley@communityenergyinc.com
Brent.Beerley@CommunityEnergyInc.com

Robert Demo
Atlantic Green Power Corp.
4525 Atlantic-Brigantine BLVD
Brigantine, NJ 08203
rdemos@atlanticgreenpower.com

Ryan J. Scerbo, Esq.
Beaver Run Solar Farm LLC
DeCotiis, FitzPatrick & Cole, LLP
Glenpointe Centre West
500 Frank W. Burr Boulevard
Teaneck, NJ 07666
RScerbo@decotiislaw.com

Shuping Cong
Blue Sky Technologies
182 Whitman Avenue
Edison, NJ 08817
Scong2001@yahoo.com

Pin Su, President
Blue Sky Technologies USA
1967 Lincoln Hwy, Suite 12
Edison, NJ 08817
solar@blueskynj.com

Kevin Skudera
Brickyard Solar Farms, LLC.
566A State Hwy 35
Red Bank, NJ 07701
skuderakg@aol.com

George Kotzias
Alethea Cleantech Advisors
34 Kingston Terrace
Kingston, NY 12401
gkotzias@aletheacleantech.com

Thomas & Mary Van Wingerden
138 Morris Turnpike, Newton< NJ 0860
maryvw@yahoo.com
Ralph Laks, Sole Managing Member
Day Four Solar, LLC
1487 Cedar Row
Lakewood, NJ 08801
lariatlake@aol.com

Michael A. Bruno, Esq.
EAI Investments, LLC
Giordano, Halleran & Ciesla
125 Half Mile Road, Suite 300
Red Bank, NJ 07701-6777
MBRUNO@GHCLAW.COM

Lawrence Neuman, President
EffiSolar Development LLC
90 Woodbridge Center Drive
Woodbridge, NJ 07095
340 East 64th Street
New York, NY 10065
lneuman@effisolar.com

Mark Noyes
Frenchtown III Solar
100 Summit lake Drive
Valhalla, NY 10595
noyesm@coneddev.com

Timothy D. Ferguson
Garden Solar, LLC
34 Coppermine Village
Flemington, NJ 08822
Tferguson@gardensolar.us

Scott Lewis
Green Energy Partners LLC
31 Fairview Hill Road
Newton, NJ 07860
klughill@aol.com

Enio Ricci
Invenergy Solar Developmen, LLC.
One South Wacker Drive
Chicago, IL 60606
ericca@invenergyllc.com

Scott Lewis
Klughill
31 Fairview Hill Road
Newton, NJ 07860
klughill@aol.com

Justin Michael Murphy, Esq.
Millenium Land Development
20 Worrell Road
Tabernacle, NJ 08088
justinmichaelmurphy@verizon.net

Dennis Wilson
Millennium Development
108 Route 46 West
Parsippany, NJ 070
dennis@renewablepowerinc.com

Paul M. Whitacre
OCI Solar Power, LLC.
300 Convent Street, Suite 1900
San Antonio, TX 78205
pwhitacre@ocisolarpower.com

Fabio Ficano
PVOne/ Moncada NJ Solar
101 California Street, Suite 3160
San Francisco, CA 94111
f.ficano@moncadaenergy.com

Elliott Shanley
PVOne, LLC
771 Shrewsbury Ave.. Suite 105
Shrewsbury NJ, 07702
eshanley@pvone.com

Scott Acker
Quakertown Farms
P.O. Box 370
Quakertown, NJ 08868
scott@gardenstategrowers.com

Bruce Martin
GreenPower Development, LLC.
100 Sharp RD
Marlton, NJ 08053
brmtnn@gmail.com

James J. Dixon
Chief Legal & Compliance Officer
ConEdison Development
NoyesM@coneddev.com

Antony Favorito
Pittsgrove Solar
331 Husted Station Road
Pittsgrove, NJ 08318
tfavorito@gmail.com

Michael Greenberg
Renewtricity
85 Challenger Road, Suite 501
Ridgefield Park, NJ 07660
mgreenberg@renewtricity.net

Keissler Wong
Rock Solid Realty, Inc.
1069 RTE 18 South
East Brunswick, NJ 08816
Keissler88@gmail.com

Jim Spano
Tetratech
516 Rt. 33 West, Building 2, Suite 1
Millstone Township, NJ 08535
jimspano@spanopartners.com

Sarah Steindel
Division of Rate Counsel
140 East Front St. 4th Fl
Post Office Box 003
Trenton, N.J. 08625-003
ssteindel@rpa.state.nj.us

Willy Chow
Sun Perfect Solar, Inc.
3101 N. First Street, Suite 107
San Jose, CA 95134
willychow@sunperfect.com

Jim Baye
jimbaye@optonline.net

Felicia Thomas-Friel
Division of Rate Counsel
140 East Front St. 4th Fl
Post Office Box 003
Trenton, N.J. 08625-003
fthomas@rpa.state.nj.us

Kristi Izzo, Secretary
NJ Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, NJ 08625-0350
Kristi.izzo@bpu.state.nj.us

Clay Rager
United Solar Works
420 Barnsboro Road
Sewell, NJ 08080
clay@ragerenergy.com

Katie Bolcar Rever, Director, Mid-Atlantic States
Energy Industries Association (SEIA)
505 9th Street NW Suite 800
Washington, DC 20005
krever@seia.org

Babette Tenzer, DAG
Division of Law
Dept. of Law & Public Safety
124 Halsey Street
P.O. Box 45029
Newark, NJ 07102-45029
Babette.Tenzer@dol.lps.state.nj.us

Betsy Ackerman, Acting Director
Office of Clean Energy
NJ Board of Public Utilities
44 South Clinton Avenue, 7th Floor
Post Office Box 350
Trenton, NJ 08625-0350
elizabeth.ackerman@bpu.state.nj.us

George Piper
Gepsr65@aol.com

Benjamin S. Hunter
Office of Clean Energy
NJ Board of Public Utilities
44 South Clinton Avenue, 7th Floor
Post Office Box 350
Trenton, NJ 08625-0350
b.hunter@bpu.state.nj.us

Harlan Vermes, Business Development Mgr
Absolutely Energized Solar Electric
974 Route 33 East
Monroe Township, NJ 08831
HVermes@aesolar.com

Michael P. Torpey, Managing Partner
A.F.T. Associates, LLC
15 West Front Street, 4th Floor
Trenton, NJ 08608
Mtorpey.aft@gmail.com

Philip J. Passanante, Esq.
Associate General Counsel
Atlantic City Electric Company
500 N. Wakefield Drive
PO Box 6066
Newark, DE 19714-6066
Philip.Passanante@pepcoholdings.com

Trevan J. Houser, President
Land Resource Solutions
30 Twosome Drive, Suite 1
Moorestown, NJ 08057
thouser@lrsrenewal.com

Marisa Slaten, DAG
Division of Law
Dept. of Law & Public Safety
124 Halsey Street
Newark, NJ 07102-45029
Marisa.Slaten@dol.lps.state.nj.us

Caroline Vachier, DAG
Division of Law
Dept. of Law & Public Safety
124 Halsey Street
P.O. Box 45029
Newark, NJ 07102-45029
Caroline.Vachier@dol.lps.state.nj.us

Rachel Boylan, Legal Specialist
NJ Board of Public Utilities
44 South Clinton Avenue, 10th Floor
Post Office Box 350
Trenton, NJ 08625-0350
rachel.boylan@bpu.state.nj.us

Allison E. Mitchell
Office of Clean Energy
NJ Board of Public Utilities
44 South Clinton Avenue, 7th Floor
Post Office Box 350
Trenton, NJ 08625-0350
allison.mitchell@bpu.state.nj.us

Stephen Jaffee, President
Brownfield Coalition of the Northeast
c/o GEI Consultants, Inc.
18000 Horizon Way, Suite 200
Mt. Laurel, NJ 08054
sboyle@geiconsultants.com

Joe Gennello
Honeywell Utility Solutions
5 East Stow Road, Suite E
Marlton, NJ 08053
joe.a.gennello@honeywell.com

Lyle K. Rawlings, P.E., Vice President
MidAtlantic Solar Energy Industries Assoc.
c/o Rutgers Eco Complex, Suite 208-B
1200 Florence-Columbus Road
Bordentown, NJ 08505
Lyle@renewablepowerinc.com

Louis Weber
Mohawk Associates LLC
47 Woodport Road
Sparta, NJ 07871
louweber@earthlink.net

David Van Camp
Burlington Twp., NJ
vancamp@Princeton.EDU

Gregory Eisenstark
Morgan, Lewis & Bockius LLP
89 Headquarters Plaza North, Suite 1419 | Morri
NJ 07960
geisenstark@morganlewis.com

David Gil
Manager - Regulatory & Political Affairs
NextEra Energy Resources, LLC
700 Universe Blvd.
Juno Beach, FL 33408
david.gil@nexteraenergy.com

Jane Quinn, Esq.
Orange & Rockland
390 West Route 59
Spring Valley, NY 10977
QUINNJ@oru.com

John Jenks
Quantum Solar
P.O. Box 368
Collingswood, NJ 08108
jwjenks01@gmail.com

Henry R. King
Reed Smith LLP
Princeton Forrestal Village
136 Main Street, Suite 250
Princeton, NJ 08540
Hking@reedsmith.com

Thad Culley & Jason B. Keyes
Keyes, Fox & Wiedman LLP
Interstate Renewable Energy Council
436 14th Street Suite 1305
Oakland, CA 94612
tculley@kfwlaw.com
jkeyes@kfwlaw.com

Alan Epstein, President & COO
KDC Solar LLC
1545 US Highway 206, Suite 100
Bedminster, NJ 07921
Alan.epstein@kdcsolar.com

Michael Maynard
NJ LAND, LLC
217 10th Street
Lakewood, NJ 08701
michaelmaynard2@gmail.com

Fred Zalcman
Director Govt. Affairs Eastern States
SunEdison
fzalcman@sunedison.com

Janice S. Mironov, Mayor, E.Windsor, Pres.
William G. Dressel, Jr., Exec. Dir.
NJ League of Municipalities
222 West State Street
Trenton, NJ 08608
league@njslom.com

Christopher Savastano
Larry Barth, Director Business Development
Richard Gardner, Vice President
NJR Clean Energy Ventures
1415 Wyckoff Road
PO Box 1464
Wall, NJ 07719
csavastano@njresources.com
lbarth@njresources.com
rgardner@njresources.com

Gary N. Weisman, President
Fred DeSanti
NJ Solar Energy Coalition
2520 Highway 35, Suite 301
Manasquan, NJ 08736
info@njsec.org
Fred.desanti@mc2publicaffairs.com

David Reiss
Davidreiss48@comcast.net

Jim McAleer, President
Solar Electric NJ, LLC
916 Mt. Vernon Avenue
Haddonfield, NJ 08033
Jim@SolarElectricNJ.com

Paul Shust & Heather Rek
Pro-Tech Energy Solutions
3322 US Rte 22W, Suite 1502
Branchburg, NJ 08876
pshust@pro-techenergy.com
hrek@pro-techenergy.com

Matthew M. Weissman, Esq.
Public Service Electric and Gas Company
80 Park Plaza - T5, PO Box 570
Newark, NJ 07102-4194
Matthew.Weisman@pseg.com

Richard A. Morally
T&M Associates
11 Tindall Road
Middletown, NJ 07748
rmorally@tandmassociates.com