

Pursuant to the Clean Energy Act of 2018 (<u>P.L.</u> 2018, <u>c.</u> 17), the New Jersey Board of Public Utilities ("Board" or "BPU") must close the SREC Registration Program ("SRP") to new applications upon the attainment of 5.1 percent of the kilowatt-hours sold in the State from solar electric power generators connected to the distribution system. By Order dated February 27, 2019 (<u>I/M/O the Modification of the Solar Renewable Portfolio Standard and Solar Alternative Compliance Payment Schedules and the Reduction of the Qualification Life for Solar Renewable <u>Energy Certificates for Solar Facilities</u>, BPU Docket No. Q018070698), the Board clarified its interpretation of this section of the Act as follows: projects previously determined to be eligible for SRECs by meeting the October 29, 2018 deadline and satisfying all other applicable requirements shall be eligible to create SRECs after the State's attainment of the 5.1% milestone; and, projects in the SRP pipeline that did not submit a completed registration or application for designation or conditional certification before midnight of October 29, 2018 and that have not commenced commercial operations when the Board determines that the 5.1% milestone has been reached may not be eligible for SRECs. The Board is monitoring the progress of the market toward achieving this milestone and will determine when it has been achieved.</u>

The Act also shortened the SREC Qualification Life from 15 to 10 years. In the same Order noted above the Board Ordered Board Staff to apply a 10-year SREC Qualification Life to all applications submitted after midnight on October 29, 2018. Please see the Board's Order for additional details. https://www.state.nj.us/bpu/pdf/boardorders/2019/20190227/2-27-19-8H.pdf

By Order dated July 10, 2019, the Board further addressed implementation of the Act by stating that projects that filed a complete SRP registration or application for designation or conditional certification after October 29, 2018 but that have not reached commercial operation at the time the Board determines that the 5.1% Milestone has been attained will be eligible to be considered for any transition program that the Board may adopt, provided they have maintained eligibility in other respects. (I/M/O a New Jersey Solar Transition Pursuant to P.L. 2018, c.17, BPU Docket No. Q019010068 Order dated July 10, 2019 available at https://www.nj.gov/bpu/pdf/boardorders/2019/20190710/7-10-19-8L.pdf)

By Order dated December 6, 2019, the Board ordered the creation of a Transition Incentive ("TI") program, comprised of fixed-price, factorized Transition Renewable Energy Certificates ("TRECs"). Projects that submitted complete SRP registrations after October 29, 2018, that have yet to commence commercial operations but otherwise remain in good standing in the SRP pipeline at the time that the Board determines that the 5.1% Milestone has been attained, will be eligible for the TI. (I/M/O a new Jersey Solar Transition Pursuant to P.L. 2018, c. 17, BPU Docket No. QO19010068, Order dated December 6, 2019 available at https://www.bpu.state.nj.us/bpu/pdf/boardorders/2019/20191206/12-6-19-8B.pdf).

For an SREC Registration packet to be deemed complete and accepted by the SRP Processing team, all the following requirements must be completed.

This checklist provides a list of the requirements for submitting a "behind-the-meter" solar project for the SREC Registration Program. A "behind-the-meter" solar PV system is a "customer-generator" facility, defined at N.J.A.C. 14:8-4.2, which is interconnected with a New Jersey Electric Distribution Company (EDC) and receives retail credit for the electricity produced via net metering.

Completed **SRP Certification Form** with all appropriate signatures.



- A one-page <u>Site Map</u> of either an overhead view drawing or a single line electrical diagram. The site map must clearly indicate the location of the generator(s), batteries (if any), lockable disconnect switch (unless otherwise approved by the electric utility, the disconnect switch shall be installed at the electric utility meter location) and point of connection with the utility system. The installation address and the installer's name must be included on the site map.
- Executed Contract A full copy of the contract is not required. Provide the key elements of the contract, including contract execution date, Premise Contact address and facility owner, Primary Contact (SREC Owner), Installer/Developer, equipment summary information, total project costs, total system capacity and dated signatures.

If the Premise Contact and the Primary Contact are the same, submit key elements of a contract signed by the Premise Contact and the Installer/Developer.

If the Premise Contact and Primary Contact are different, submit either the key elements of one contract signed by all three parties or the key elements of two signed contracts: one between the Primary Contact and Premise Contact and one between the Primary Contact and Installer/Developer.

Public projects must comply with this requirement.

Self-Installations-To satisfy the contract requirement, self installations must include the purchase order or invoice for the solar equipment. Self- Installations are subject to the Chapter 8 rules for compliance based on the most recent date on the purchase order or invoice.

- Milestone Reporting Form- For all Net Metered Facilities greater than 1 MW-This form is required to be submitted with the initial SRP Registration packet and quarterly thereafter until the Final As-Built packet is submitted. Quarterly reports must be submitted to the SRP Processing Team within two weeks of the quarter ending on March 31, June 30, September 30 and December 31. Quarterly reports can be submitted via email to njreinfo@njcleanenergy.com.
- □ **For all Net Metered Facilities 2 MW or larger** A Complete Part I Interconnection Application approval (Approval to Install) from the EDC must be submitted with the SRP Registration Packet.

For Electric Storage Battery installation with the solar system- A single line drawing showing the location of the solar equipment and electric storage battery must be submitted. Include a cover letter with the SRP Registration packet indicating that a battery will be installed at the site. For additional requirements on installing electric storage batteries with solar, please contact Dan Murnane at <u>dmurnane@trcsolutions.com</u>

System owners are encouraged to apply for interconnection commensurate with submission of an SRP Registration Form to ensure that the system built will be interconnected by the EDC, particularly if the project involves new construction. <u>Registrants are reminded that the SRP Project Acceptance Letter does not constitute net metering and</u> <u>interconnection approval.</u> On-site load at least equal to project generation must exist before a net-metered system may be energized or final program approval is issued.

On February 22, 2017, the Board re-adopted Chapter 8 (renewable energy and energy efficiency) rules with amendments that became effective upon publication on April 17, 2017. Per N.J.A.C. 14:8-2.4, the SRP Processing Team must receive a complete SRP Registration packet no later than 14 business days from the execution date of the contract (or in the case of a grid supply project the effective date of the BPU Board Order granting approval, conditional certification, or

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designation). Contracts are considered executed on the date of the most recent signature or the execution date identified within the contract. Contracts received with executed dates that are not compliant with the 14-day rule will be accepted into the program, but it will be noted in the SRP Acceptance letter that the project is non-compliant. If the applicable deadline is not met, any SRECs based on electricity generated by the solar facility shall not be usable for compliance with the New Jersey renewable portfolio standard (RPS) until 12 months after the solar facility has received authorization to energize by the EDC in accordance with the Board's interconnection rules at N.J.A.C. 14:8-5. See <u>NJ Administrative Code</u>.

If the most recent date on the executed contract exceeds the date the SRP Registration Packet is submitted into the online portal, the registration will be rejected, and the SRP Registration Packet must be resubmitted with no reference to the previous registration.

The Electric Distribution Companies (EDC) will be approving interconnection based upon the net metering and interconnection rules (N.J.A.C Title 14-Public Utilities, Chapter 8 - Renewable Energy and Energy Efficiency and Subchapter 4-Net Metering and Interconnection Standards for Class I Renewable Energy Systems).

Once the SRP Package is reviewed, deemed complete and all documents are uploaded into the online registration portal, the Primary Contact, Premise Contact, and the Installer/Developer will receive an SRP Acceptance Letter via email. This email will certify that the project, once it is installed and all SRP requirements are fulfilled, may be eligible to generate SRECs in accordance with the State's RPS rules [please see bolded language above regarding eligibility to generate SRECs for projects that submitted registrations/applications after October 29, 2018]. You must obtain PTO by the local Electric Distribution Company, submit all post construction documents which can be found on the Final As-Built Checklist and meet all other program requirements on or before: 1) the expiration date noted on your SRP acceptance letter or 2) the Board's determination that the 5.1% milestone has been achieved, whichever is earlier. If you cannot complete the solar installation by the expiration date, you may be eligible for one extension, not to exceed 6 months, with the actual length contingent upon the date on which the Board closes the SRP. <u>NOTE: AN EXTENSION WILL NOT CONFER ELIGIBILITY FOR SRECS IF THE BOARD DETERMINES THAT THE 5.1% MILESTONE HAS BEEN ACHIEVED PRIOR TO COMMENCEMENT OF COMMERCIAL OPERATIONS.</u>

The NJBPU and the SRP Processing Team must be notified within ten (10) business days after the execution of a change order, contract for purchase, installation or removal of panels for any increases or decreases of more than 10% to the size of the solar system submitted with the initial registration. An email should be submitted to <u>oce@bpu.nj.gov</u> and notification must be uploaded into the online portal.

SREC Eligibility for Adding Capacity to a Previously Installed System

There are two options for solar systems meeting the following three criteria:

- 1. *Both* the initial and add-on registrations were submitted on or before October 29, 2018
- 2. Both the initial and add-on registrations were submitted after October 29, 2018, or
- 3. The initial registration was submitted before October 29, 2018, the add-on registration was submitted after October 29, 2018, *and* the remaining SREC Qualification Life is less than 10 years

Two Options

1) If a new solar production meter is installed for the add-on capacity, then the add-on capacity will receive a new certification number and a:



- a) 15-year SREC Qualification Life if the registration for the add-on capacity was submitted on or before midnight of October 29, 2018
- b) 10-year SREC Qualification Life if the registration for the add-on capacity was submitted after midnight of October 29, 2018
- 2) If a new solar production meter is <u>**not**</u> installed, then the add on capacity would retain the remaining Qualification Life of the initial registration.

For add-on projects where the registration for the add-on capacity was submitted after midnight of October 29, 2018, **and** the remaining SREC Qualification Life of the initial registration exceed 10-years:

Only Option

1) A new solar production meter is required for the add-on capacity to be eligible to receive SRECs.

The project numbers and the Permission to Operate (PTO) dates for previously installed solar systems can be found on the Solar Installation Report at <u>SRP Solar Reports</u>

For additional examples and tables for adding capacity to a previously installer solar system, please see <u>2019 SRP</u> <u>Guidebook</u>

SREC Registration Program Contacts

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