



2019 SREC Registration Program (SRP) Registration Checklist Grid Supply Projects

Pursuant to the Clean Energy Act of 2018 (P.L. 2018, c. 17), the New Jersey Board of Public Utilities (“Board” or “BPU”) must close the 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, Docket No. QO18070698, 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.

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. QO19010068 Order dated July 10, 2019 available at

<https://www.nj.gov/bpu/pdf/boardorders/2019/20190710/7-10-19-8L.pdf>

Requirements for a project registration to be deemed complete and accepted by the SRP Processing team, all of the following must be completed. This checklist provides a list of requirements for submitting a “grid supply” solar registration in the SREC Registration Program (SRP). A “grid supply” solar PV system is a merchant power generator interconnected to the New Jersey distribution system in compliance with the federal rules established for wholesale electricity suppliers managed by PJM Interconnection, LLC., the regional transmission operator.

Grid supply project developers are encouraged to work with PJM and the relevant Electric Distribution Company (EDC) to determine feasibility, impact and other requirements prior to executing a contract for construction and submitting an SRP Registration Packet.

- Completed **SRP Certification Form** with all appropriate signatures. **All sections must be completed**
- A **Site Map** -Including all features that may affect performance and construction of the solar system



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- Documentation of the determination by PJM or the EDC** confirming that the point of interconnection is located on the EDC's distribution system serving NJ. The registrant must work with the EDC representative to obtain this written determination. Submit either a letter from the EDC or the executed Interconnection Service Agreement (ISA).
- Executed Contract – N.J.A.C. 14:8-2.4 (h) 5** requires a contract OR a legally binding document that provides reasonable assurance that the solar facility will be constructed. An EPC contract is not the only means to satisfy the provision at **N.J.A. C. 14:8-2.4 (h) 5**. Therefore, those registrants that cannot provide an EPC contract, must include alternate legally binding documents which contain information that provide the New Jersey Board of Public Utilities (NJBPU) reasonable assurance that the facility will be built. The agreement that is provided must include certain key elements such as the execution date, premise address, Premise Contact, Primary Contact (SREC owner), developer/installer, equipment summary, total estimated project cost, total system capacity and dated signatures. The cover letter must include a statement why an EPC contract is not provided explaining how the documentation provides the necessary information missing by the absence of the EPC.

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.

- A copy of the NJBPU Board Order granting conditional certification for a solar facility project to be constructed on land that meets the definition of a “properly closed sanitary landfill”, “brownfield” or “area of historic fill” pursuant to subsection (t) of the Solar Act.** To obtain full certification, the applicant must demonstrate to Board Staff that all NJDEP requirements have been satisfied and there are no outstanding requirements. Board Staff will issue full certification to the project upon the Applicant's demonstration that all requirements for full certification have been satisfied.
- Milestone Reporting Form-** -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.

The size of the system may not be increased beyond the capacity conditionally certified in the Board Order. Decreases to the system size are permitted. Registrants must also notify the Program Manager of any plans to reduce the system size below the approved capacity and the change must be noted in the next submission of the SRP Milestone Reporting Form. Please indicate the reduction in capacity on the form by checking the appropriate box and providing an explanation in the Comments section of the form.



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On February 22, 2017, the BPU 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 designation**). Contracts are considered executed on the date of their most recent signature or the execution date within the contract. Contracts received with executed dates that are not compliant with the 14-day rule will be accepted into the program but will be determined to be non-compliant which will be noted in the SRP Acceptance letter. 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 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 [NJ Administrative Code](#).

“Construction Complete”, as defined by the SRP Program Manager for purposes of implementing the SRP, is the date of the EDC Permission to Operate (PTO).

Once the SRP Package is reviewed, deemed complete and all documents are uploaded into the online application 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 and other requirements contained in any applicable Board Order are fulfilled, will be eligible to generate SRECs in accordance with the State's RPS rules. The commitment length for completing the solar installation will be determined in the Board Order conditionally certifying your solar project. 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.

Facilities that require approval or certification by the Board, where the installation cannot be completed by the project expiration date, 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. **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.** For further information on the SRP Extension Policy njcleanenergy.com

Program Contacts

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