



COMMUNITY
ENERGY SOLAR

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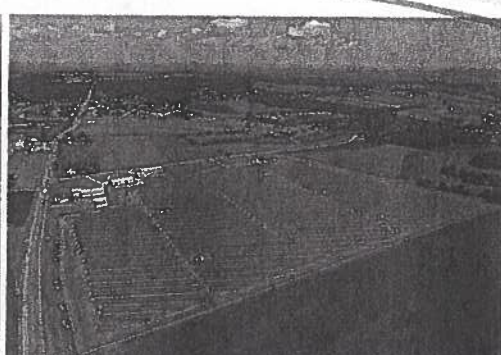
CUMBERLAND

SOLAR LLC

2019091267

A NEW JERSEY COMMUNITY SOLAR ENERGY
PILOT PROGRAM APPLICATION

RECEIVED
MA 2019
SEP 08 2019
BOARD OF PUBLIC UTILITIES
TRENTON, NJ



COMMUNITY ENERGY, INC

Three Radnor Corporate Center, Ste 300 • 100 Matsonford Rd. • Radnor, PA 19087



Table of Contents

- 1. EXECUTIVE SUMMARY**
 - 1.1 COMPANY PROFILE**
 - 1.2 COMPANY EXPERIENCE**
 - 1.3 PROJECT PROFILE**
- 2. COMMUNITY SOLAR ENERGY PILOT PROGRAM APPLICATION**
- 3. COMMUNITY SOLAR APPLICATION - SUPPORTING INFORMATION**
 - 3.1 COMMUNITY SOLAR ENERGY PROJECT DESCRIPTION**
 - A. EPC DEVELOPER**
 - B. ESTIMATED DATE OF PROJECT COMPLETION**
 - C. USE RESTRICTIONS**
 - D. PERMIT READINESS CHECKLIST & PCER MEETING**
 - E. HOSTING CAPACITY MAP**
 - F. SUBSCRIPTIONS AND SUBSCRIBERS**
 - G. PROJECT COST**
 - 3.2 EVALUATION CRITERIA**
 - A. 30 POINTS: LMI AND ENVIRONMENTAL JUSTICE**
 - B. 20 POINTS: SITING**
 - C. 5 POINTS: SITING BONUS**
 - D. 15 POINTS: PRODUCT OFFERING**
 - E. 10 POINTS: COMMUNITY & ENVIRONMENTAL JUSTICE ENGAGEMENT**
 - F. 10 POINTS: SUBSCRIBERS**
 - G. 10 POINTS: OTHER BENEFITS**
 - H. 5 POINTS: GEOGRAPHIC LIMIT**
- 4. COMMUNITY SOLAR APPLICATION – SUPPORTING DOCUMENTATION**
 - 4.1 DELINEATED SITE MAP**
 - 4.2 PROOF OF SITE CONTROL**
 - 4.3 EXCERPT - NJ MUNICIPAL LAND USE LAW - SOLAR AS INHERENTLY BENEFICIAL USE**
 - 4.4 NJDEP OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW**
 - 4.5 EDC HOSTING CAPACITY**
 - 4.6 COMMUNITY ENGAGEMENT AND ENVIRONMENTAL JUSTICE LETTERS OF SUPPORT**
 - 4.7 PROJECT COST SPREADSHEET MODEL**
 - 4.8 POLLINATOR FRIENDLY SOLAR SCORECARD**
- 5. COMMUNITY SOLAR APPLICATION – CERTIFICATIONS**
 - 5.1 APPLICANT CERTIFICATION**
 - 5.2 PROJECT DEVELOPER CERTIFICATION**
 - 5.3 PROJECT OWNER CERTIFICATION**
 - 5.4 PROPERTY OWNER CERTIFICATION**
 - 5.5 SUBSCRIBER ORGANIZATION CERTIFICATION**
- 6. COMMUNITY SOLAR APPLICATION – APPENDIX**
 - 6.1 PRODUCT OFFERING QUESTIONNAIRE**
 - 6.2 REQUIRED ATTACHMENTS CHECKLIST**



1. Executive Summary

Community Energy Solar, LLC (CES) courtesy of Cumberland Solar LLC is pleased to present the Cumberland Solar project for consideration by the New Jersey Board of Public Utilities (BPU) in Year 1 of the Community Solar Energy Pilot Program. Community solar is an exciting new market that will spread the economic and environmental benefits of renewable energy to New Jersey citizens of all walks of life, including certain underserved communities that have, thus far, been unable to benefit from solar power.

Because all solar projects are not created equal, CES and Cumberland Solar are committing to implement leading environmental and social practices to ensure that the projects are both good for the environment and good for the community. We know that Governor Murphy's office and the BPU share that same commitment as evidenced in the design of the Community Solar Energy Program. In light of that shared commitment, we want to highlight the key features of the proposed Cumberland Solar project, which will:

➤

➤

➤



Community Energy feels strongly about the enclosed proposal and would value the opportunity to provide an in-person presentation to expand upon any part of this submittal. CES looks forward to working with the BPU on a productive pilot program rollout and developing successful projects, including Cumberland Solar.



1.1 *Company profile*

Community Energy was founded in 1999 with the goal of pioneering innovative approaches to the development of renewable energy. In its early years, Community Energy led the development, finance, and construction of more than 450 MW of wind projects in Illinois, Missouri, New Hampshire, New Jersey and Pennsylvania. In 2006, the company was acquired by Iberdrola Renewables, a Spanish utility and the largest renewable energy generation asset owner and operator in the world. Over the next three years the Community Energy team worked for Iberdrola as it built a \$3 billion portfolio of wind assets across the US.

In 2009, under a mutually agreeable spin-out, Community Energy once again became an independent and privately-held company, retaining its well-recognized brand and key members of its proven development team. Leveraging the experience and relationships gained in the development of wind projects, Community Energy launched CES, its solar development initiative. Over the past 10 years, CES has developed over 1,000 MW of solar projects in locations including: Indiana, Illinois, Pennsylvania, Maryland, Virginia, North Carolina, South Carolina, Georgia, Colorado, Utah, Minnesota, New York, New Jersey, and Massachusetts – representing another \$3 billion in invested capital.

CES is currently active across the US, with a solar development pipeline exceeding 3GW. The company is headquartered in Radnor, Pennsylvania, with offices in Boulder, Colorado and Chapel Hill, North Carolina. CES has a current staff of about 55 people in both development and marketing.

1.2 *Company Experience*

Community Energy has a proven track-record of delivering quality solar projects and has a keen understanding of how to navigate the complex market and financial structures needed to execute long-term deals and get projects built. We have also been a leader in the community solar market, with projects operating and under construction in CO, MN, MA, and NY, as well as serving as a founding member of the leading industry advocacy group Coalition for Community Solar Access (CCSA).

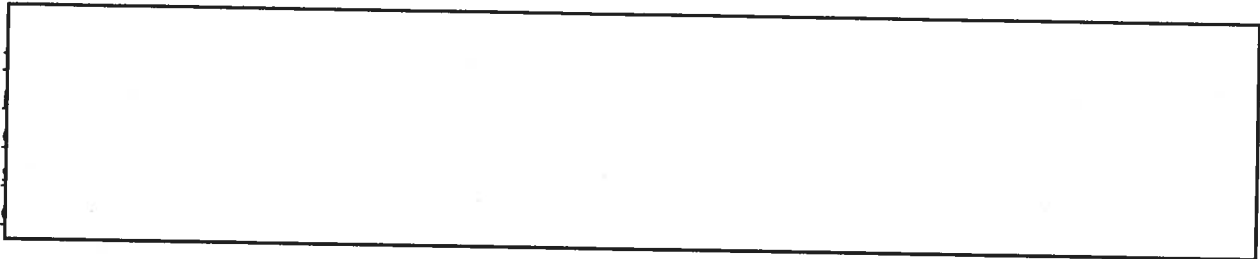
Of specific relevance to the New Jersey Community Energy Solar Pilot Program, CES has already successfully developed 11 projects, over 30MWdc, in the state of New Jersey. We are very familiar with both the land use permitting and utility interconnection processes and have well developed relationships with companies, officials, and consultants across the state that provide the necessary level of expertise at the local level to get projects approved. And in addition to our development capabilities, we also have a veteran, in-house renewable energy marketing team that has managed CES's participation as a utility green power supplier in the New Jersey CleanPower Choice program from 2005 – 2018, with 2,000 residential and business customers across ACE, PSEG, and JCP&L.



The above outlined depth and wealth of New Jersey specific experience, along with our corporate office location in Radnor, PA, less than 90 minutes from most of the state, is what sets CES apart as an ideal partner on the NJ Community Energy Solar Pilot Program.

1.2 Project Profile:

The Cumberland Solar project is a planned 2.6 MWdc community solar project on property located in Cumberland County, Deerfield Township, New Jersey. The project will be sited on approximately 13.7 acres within a private 23.48 acre parcel located at approximately 532 Irving Ave. The 2.0 MWac project will interconnect into the ACE distribution system and provide power for local community solar customers.





2. Community Solar Energy Pilot Program Application

Following is the completed Community Solar Energy Pilot Program Application for Cumberland Solar LLC.

For all sections that request or require further information or explanation, please refer to the "Community Solar Application – Supporting Information document" that follows the official application. The application will identify and reference the appropriate sections in the Supporting Information document where the necessary information can be found.



Section B: Community Solar Energy Project Description

Instructions: Section B must be completed in its entirety. Any attachments should be placed at the end of the Application package.

2019091267

I. Applicant Contact Information

Applicant Company/Entity Name: Cumberland Solar LLC

First Name: Brent

Last Name: Beerley

Daytime Phone: 917-750-6383

Email: jesse.cutaia@communityenergyinc.com

Applicant Mailing Address: Three Radnor Corporate Center, Suite 300, 100 Matsonford Road, Radnor PA

Municipality: Radnor

County: Delaware

Zip Code: 19087

Applicant is:

☒ Community Solar Project Owner

☒ Community Solar Developer/Facility Installer

☐ Property/Site Owner

☐ Subscriber Organization

☐ Agent (if agent, what role is represented) _____

II. Community Solar Project Owner

Project Owner Company/Entity Name (complete if known): Cumberland Solar LLC

First Name: Brent

Last Name: Beerley

Daytime Phone: 917-750-6383

Email: jesse.cutaia@communityenergyinc.com

Mailing Address: Three Radnor Corporate Center, Suite 300, 100 Matsonford Road, Radnor PA

Municipality: Radnor

County: Delaware

Zip Code: 19087

III. Community Solar Developer

This section, "Community Solar Developer," is optional if: 1) the Applicant is a government entity (municipal, county, or state), AND 2) the community solar developer will be selected by the Applicant via a RFP, RFQ, or other bidding process. In all other cases, this section is required.

Developer Company Name (optional, complete if applicable): Cumberland Solar LLC

First Name: Brent

Last Name: Beerley

Daytime Phone: 917-750-6383

Email: jesse.cutaia@communityenergyinc.com

Mailing Address: Three Radnor Corporate Center, Suite 300, 100 Matsonford Road, Radnor PA

Municipality: Radnor

County: Delaware

Zip Code: 19087

The proposed community solar project will be primarily built by:

☐ the Developer

☒ a contracted engineering, procurement and construction ("EPC") company



Certain information in this document, as identified with a black arrow, is strictly confidential. Do not copy or share.

If the proposed community solar project will be primarily built by a contracted EPC company, complete the following (*optional, complete if known*):

If the EPC company information is left blank and the proposed project is approved by the Board for participation in the Community Solar Energy Pilot Program, the Applicant must inform the Board of the information below once the EPC company becomes known.

EPC Company Name (*optional, complete if applicable*): Unknown. See Support Information section 3.1(A)

First Name: _____ Last Name: _____

Daytime Phone: _____ Email: _____

Mailing Address: _____

Municipality: _____ County: _____ Zip Code: _____

IV. Property/Site Owner Information

Property Owner Company/Entity Name: N/A

First Name: Frank Last Name: Paladino

Daytime Phone: _____

Applicant Mailing Address: PO Box 283, Rosenhayn NJ 08352-0283

Municipality: Deerfield Township County: Cumberland Zip Code: 08352-0283

V. Community Solar Subscriber Organization (*optional, complete if known*)

If this section, "Community Solar Subscriber Organization," is left blank and the proposed project is approved by the Board for participation in the Community Solar Energy Pilot Program, the Applicant must inform the Board of the information below once the Subscriber Organization becomes known.

Subscriber Organization Company/Entity Name (*optional, complete if applicable*): Community Energy Solar LLC

First Name: Brent Last Name: Beerley

Daytime Phone: 1-866-754-0222 Email: Communitysolar@communityenergyinc.com

Mailing Address: Three Radnor Corporate Center, Suite 300, 100 Matsonford Road, Radnor PA

Municipality: Radnor County: Delaware Zip Code: 19087

VI. Proposed Community Solar Facility Characteristics

Community Solar Facility Size (as denominated on the PV panels):

2.0 MW AC 2.6 MW DC

Community Solar Facility Location (Address): 532 Irving Ave

Municipality: Deerfield Township County: Cumberland Zip Code: 08332

Name of Property (*optional, complete if applicable*): N/A

Property Block and Lot Number(s): 0603_79_36_QFarm



Community Solar Site Coordinates: -75.128934° Longitude 39.437390° Latitude

Total Acreage of Property Block and Lots: 23.48 acres

Total Acreage of Community Solar Facility: 13.7 acres

Attach a delineated map of the portion of the property on which the community solar facility will be located. In the electronic submission, two copies of the delineated map should be provided: 1) as a PDF document, and 2) as a design plan in drawing file format (.dwg) or as a shapefile (.shp), in order to facilitate integration with Geographic Information System (GIS) software.

EDC electric service territory in which the proposed community solar facility is located: *(select one)*

☒ Atlantic City Electric

☐ Jersey Central Power & Light

☐ Public Service Electric & Gas

☐ Rockland Electric Co.

Estimated date of project completion* *(The Applicant should provide a good faith estimate of the date of project completion; however, this data is being collected for informational purposes only.)*: December
(month) 2020 (year)

Project completion is defined pursuant to the definition at N.J.A.C. 14:8-9.3 as being fully operational, up to and including having subscribers receive bill credits for their subscription to the project.

The proposed community solar facility is an existing project* ☐ Yes ☒ No

If "Yes," the Application will not be considered by the Board. See section B. XIII. for special provisions for projects having received a subsection (t) conditional certification from the Board prior to February 19, 2019.

*Existing project is defined in N.J.A.C. 14:8-9.2 as a solar project having begun operation and/or been approved by the Board for connection to the distribution system prior to February 19, 2019.

VII. Community Solar Facility Siting

1. The proposed community solar project has site control* ☒ Yes ☐ No

If "Yes," attach proof of site control.

If "No," the Application will be deemed incomplete.

*Site control is defined as property ownership or option to purchase, signed lease or option to lease, or signed contract for use as a community solar site or option to contract for use as a community solar site.

2. The proposed community solar facility is located, in part or in whole, on preserved farmland* ☐ Yes ☒ No

If "Yes," the Application will not be considered by the Board.



*Preserved farmland is defined in N.J.A.C. 14:8-9.2 as land from which a permanent development easement was conveyed and a deed of easement was recorded with the county clerk's office pursuant to N.J.S.A. 4:1C-11 et seq.; land subject to a farmland preservation program agreement recorded with the county clerk's office pursuant to N.J.S.A. 4:1C-24; land from which development potential has been transferred pursuant to N.J.S.A. 40:55D-113 et seq. or N.J.S.A. 40:55D-137 et seq.; or land conveyed or dedicated by agricultural restriction pursuant to N.J.S.A. 40:55D-39.1.

3. The proposed community solar facility is located, in part or in whole, on Green Acres preserved open space* or on land owned by the New Jersey Department of Environmental Protection (NJDEP) ☐ Yes ☒ No

If "Yes," the Applicant must attach special authorization from NJDEP for the site to host a community solar facility. The Board will not consider Applications for projects located, in part or in whole, on Green Acres preserved open space or on land owned by NJDEP, unless the Applicant has received special authorization from NJDEP and includes proof of such special authorization in the Application package.

*Green Acres preserved open space is defined in N.J.A.C. 14:8-9.2 as land classified as either "funded parkland" or "unfunded parkland" under N.J.A.C. 7:36, or land purchased by the State with "Green Acres funding" (as defined at N.J.A.C. 7:36).

4. The proposed community solar facility is located, in part or in whole, on land located in the New Jersey Highlands Planning Area or Preservation Area ☐ Yes ☒ No

5. The proposed community solar facility is located, in part or in whole, on land located in the New Jersey Pinelands ☐ Yes ☒ No

6. The proposed community solar facility is located, in part or in whole, on land that has been actively devoted to agricultural or horticultural use and that is/has been valued, assessed, and taxed pursuant to the "Farmland Assessment Act of 1964," P.L. 1964, c.48 (C. 54:4-23.1 et seq.) at any time within the ten year period prior to the date of submission of the Application ☒ Yes ☐ No

7. The proposed community solar facility is located, in part or in whole, on a landfill ☐ Yes ☒ No
If "Yes," provide the name of the landfill, as identified in NJDEP's database of New Jersey landfills, available at www.nj.gov/dep/dshw/lrm/landfill.htm: _____

8. The proposed community solar facility is located, in part or in whole, on a brownfield ☐ Yes ☒ No
If "Yes," has a final remediation document been issued for the property? ☐ Yes ☐ No



If "Yes," attach a copy of the Response Action Outcome ("RAO") issued by the LSRP or the No Further Action ("NFA") letter issued by NJDEP.

9. The proposed community solar facility is located, in part or in whole, on an area of historic fill ☐ Yes ☒ No
If "Yes," have the remedial investigation requirements pursuant to the Technical Requirements for Site Remediation, N.J.A.C. 7:26E-4.7 been implemented? ☐ Yes ☐ No
Has the remediation of the historic fill been completed pursuant to the Technical Requirements for Site Remediation, N.J.A.C. 7:26E-5.4? ☐ Yes ☐ No
If the remediation of the historic fill has been completed, attach a copy of the Response Action Outcome ("RAO") issued by a Licensed Site Remediation Professional ("LSRP") or the No Further Action ("NFA") letter issued by NJDEP.
10. The proposed community solar facility is located on a parking lot ☐ Yes ☒ No
11. The proposed community solar facility is located on a parking deck ☐ Yes ☒ No
12. The proposed community solar facility is located on a rooftop ☐ Yes ☒ No
13. The proposed community solar facility is located on a canopy over an impervious surface (e.g. walkway) ☐ Yes ☒ No
14. The proposed community solar facility is located on the property of an affordable housing building or complex ☐ Yes ☒ No
15. The proposed community solar facility is located on a water reservoir or other water body ("floating solar") ☐ Yes ☒ No
16. The proposed community solar facility is located on an area designated in need of redevelopment ☐ Yes ☒ No
If "Yes," attach proof of the designation of the area as being in need of redevelopment from a municipal, county, or state entity.
17. The proposed community solar facility is located on land or a building that is preserved by a municipal, county, state, or federal entity ☐ Yes ☒ No
If "Yes," attach proof of the designation of the area as "preserved" from a municipal, county, or state entity.
18. The proposed community solar facility is located, in part or in whole, on forested lands ☐ Yes ☒ No



Construction of the proposed community solar facility will require cutting down one or more trees ☐ Yes ☒ No
If "Yes," estimated number of trees required to be cut for construction: _____

19. The proposed community solar facility is located on land or a building owned or controlled by a government entity, including, but not limited to, a municipal, county, state, or federal entity ☐ Yes ☒ No

20. Are there any use restrictions at the site? ☒ Yes ☐ No
If "Yes," explain the use restriction below and provide documentation that the proposed community solar project is not prohibited.

See Community Solar Application - Supporting Information section 3.1(C)

Will the use restriction be required to be modified? ☒ Yes ☐ No
If "Yes," explain the modification below.

See Community Solar Application - Supporting Information section 3.1(C)

21. The proposed community solar facility has been specifically designed or planned to preserve or enhance the site (e.g. landscaping, land enhancements, pollination support, stormwater management, soil conservation, etc.) ☒ Yes ☐ No
If "Yes," explain below, and provide any additional documentation in an attachment.

See Community Solar Application - Supporting Information section 3.2(C)

VIII. Permits

1. The Applicant has completed NJDEP Permit Readiness Checklist, and submitted it to NJDEP's PCER ☒ Yes ☐ No
If "Yes," attach a copy of the completed Permit Readiness Checklist as it was submitted to NJDEP PCER.



If "No," the Application will be deemed incomplete. Exception: Applications for community solar projects located on a rooftop, parking lot, or parking structure are exempt from this requirement.

2. The Applicant has met with NJDEP's PCER ☒ Yes ☐ No

If "Yes," attach proof of a meeting with NJDEP PCER.

If "No," the Application will be deemed incomplete. Exception: Applications for community solar projects located on a rooftop, parking lot, or parking structure are exempt from this requirement.

3. Please list all permits, approvals, or other authorizations that will be needed for the construction and operation of the proposed community solar facility pursuant to local, state and federal laws and regulations. Include permits that have already been received, have been applied for, and that will need to be applied for. The Applicant may extend this table by attaching additional pages if necessary. These include:

- Permits, approvals, or other authorizations from NJDEP (i.e. Land Use, Air Quality, New Jersey Pollutant Discharge Elimination System "NJPDES", etc.) for the property.
- Permits, approvals, or other authorizations from NJDEP (i.e. Land Use, Air Quality, NJPDES, etc.) directly related to the installation and operation of a solar facility on this property.
- Permits, approvals, or other authorizations other than those from NJDEP for the development, construction, or operation of the community solar facility (including local zoning and other local and state permits)

An Application that does not list all permits, approvals, or other authorizations that will be needed for the construction and operation of the proposed community solar facility will be deemed incomplete.

If a permit has been received, attach a copy of the permit.

Permit Name & Description	Permitting Agency/Entity	Date Permit Applied for (if applicable) / Date Permit Received (if applicable)
Freshwater Wetlands LOI - Line Verification	NJDEP	Will apply upon project award
Flood Hazard Area Verification Permit	NJDEP	Will apply upon project award
Construction Activity Stormwater General Permit	NJDEP	Will apply upon project award
County Planning Board Approval	Cumberland County Planning Dept	Will apply upon project award
Road Access Permit	Cumberland County Planning Dept	Will apply upon project award
Soil Erosion and Sediment Control Plan Approval	Cumberland Salem Conservation District	Will apply upon project award
Township Land Use Board Approval	Deerfield Township	Will apply upon project award
Construction Permit	Deerfield Township	Will apply upon project award
Electrical Permit	Deerfield Township	Will apply upon project award
Fire Department Approval	Deerfield Township	Will apply upon project award
Utility Interconnection Approval	Atlantic City Electric	Will apply upon project award

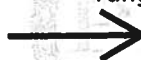



4. The Applicant has consulted the hosting capacity map of the relevant EDC and determined that, based on the capacity hosting map as published at the date of submission of the Application, there is sufficient capacity available at the proposed location to build the proposed community solar facility ☒ Yes ☐ No
If "Yes," include a screenshot of the capacity hosting map at the proposed location, showing the available capacity.
If "No," the Application will be deemed incomplete.

IX. Community Solar Subscriptions and Subscribers

1. Estimated or Anticipated Number of Subscribers (please provide a good faith estimate or range):
375 - 425


2. Estimated or Anticipated Breakdown of Subscribers (please provide a good faith estimate or range of the kWh of project allocated to each category):

 Residential: Commercial: 
Industrial: Other: (define "other":)

3. The proposed community solar project is an LMI project* ☒ Yes ☐ No
*An LMI project is defined pursuant to N.J.A.C. 14:8-9 as a community solar project in which a minimum 51 percent of project capacity is subscribed by LMI subscribers.

4. The proposed community solar project will allocate at least 51% of project capacity to residential customers ☒ Yes ☐ No

5. The proposed community solar project is being developed in partnership with an affordable housing provider: ☒ Yes ☐ No
If "Yes," attach a letter of support from the affordable housing provider.

6. An affordable housing provider is seeking to qualify as an LMI subscriber for the purposes of the community solar project ☒ Yes ☐ No
If "Yes," estimated or anticipated percentage of the project capacity for the affordable housing provider's subscription (provide an estimate or range): 

If "Yes," what specific, substantial, identifiable, and quantifiable long-term benefits from the community solar subscription are being passed through to their residents/tenants?



See Community Solar Application - Supporting Information section 3.1(F)

Additionally, the affordable housing provider must attach a signed affidavit that the specific, substantial, identifiable, and quantifiable long-term benefits from the community solar subscription will be passed through to their residents/tenants.

7. This project uses an anchor subscriber (*optional*) ☐ Yes ☒ No
If "Yes," name of the anchor subscriber (*optional*): _____
Estimated or anticipated percentage or range of the project capacity for the anchor subscriber's subscription: _____
8. Is there any expectation that the account holder of a master meter will subscribe to the community solar project on behalf of its tenants? ☒ Yes ☐ No
If "Yes," what specific, identifiable, sufficient, and quantifiable benefits from the community solar subscription are being passed through to the tenants?

See Community Solar Application - Supporting Information section 3.1(F)

Additionally, the account holder of the master meter must attach a signed affidavit that the specific, identifiable, sufficient, and quantifiable benefits from the community solar subscription will be passed through to the tenants.

If "No," please be aware that, if, at any time during the operating life of the community solar project the account holder of a master meter wishes to subscribe to the community solar project on behalf of its tenants, it must submit to the Board a signed affidavit that the specific, identifiable, sufficient, and quantifiable benefits from the community solar subscription will be passed through to its tenants.

9. The geographic restriction for distance between project site and subscribers is: (*select one*)
- ☐ No geographic restriction: whole EDC service territory
 - ☒ Same county OR same county and adjacent counties
 - ☐ Same municipality OR same municipality and adjacent municipalities

Note: The geographic restriction selected here will apply for the lifetime of the project, barring special dispensation from the Board, pursuant to N.J.A.C. 14:8-9.5(a).



10. Product Offering: *(The Applicant must also complete and attach one or more product offering form(s) found in Appendix A. See Appendix A for exemptions.)*

The subscription proposed offers guaranteed or fixed savings to subscribers ☒ Yes ☐ No

If "Yes," the guaranteed or fixed savings are offered as:

- ☐ A percentage saving on the customer's annual electric utility bill
☒ A percentage saving on the customer's community solar bill credit
☐ Other: _____

If "Yes," the proposed savings represent:

☐

- 0% - 5% of the customer's annual electric utility bill or bill credit
 5% - 10% of the customer's annual electric utility bill or bill credit
 10% - 20% of the customer's annual electric utility bill or bill credit
 over 20% of the customer's annual electric utility bill or bill credit

The subscription proposed offers subscribers ownership or a pathway to ownership of a share of the community solar facility ☐ Yes ☒ No

If "Yes," include proof of a pathway to ownership of a share of the community solar facility offered to the subscribers in Appendix A.

11. The list of approved community solar projects will be published on the Board's website. Additionally, subscriber organizations have the option of indicating, on this list, that the project is currently seeking subscribers.

If this project is approved, the Board should indicate on its website that the project is currently seeking subscribers ☒ Yes ☐ No

If "Yes," the contact information indicated on the Board's website should read:

Company/Entity Name: Community Energy Solar LLC Contact Name: Amy Lobel
 Daytime Phone: 1-866-754-0222 Email: Communitysolar@communityenergyinc.com

Note: it is the responsibility of the project's subscriber organization to notify the Board if/when the project is no longer seeking subscribers, and request that the Board remove the above information on its website.

X. Community Engagement

1. The proposed community solar project is being developed by or in collaboration* with the municipality in which the project is located ☐ Yes ☒ No

If "Yes," explain how and attach a letter of support from the municipality in which the project is located.

*Collaboration with the municipality should include, at minimum, one or more meetings with relevant municipal authorities and clear evidence of municipal involvement and approval of the design, development, or operation of the proposed community solar project.



2. The proposed community solar project is being developed in collaboration* with one or more local community organization(s) ☒ Yes ☐ No

If "Yes," explain how and attach a letter of support from the local community organization(s).

*Collaboration with a local community organization should include, at minimum, one or more meetings with the relevant local community organization(s) and clear evidence of the local community organization's involvement and approval of the design, development, or operation of the proposed community solar project.

See Community Solar Application - Supporting Information section 3.2 (E)

3. The proposed community solar project was developed, at least in part, through a community consultative process* ☒ Yes ☐ No

If "Yes," please describe the consultative process.

*A community consultative process should include, at minimum, one or more opportunities for public intervention and outreach to the municipality and/or local community organizations.

See Community Solar Application - Supporting Information section 3.2 (E)

XI. Project Cost

1. Provide the following cost estimates and attach substantiating evidence in the form of charts and/or spreadsheet models:

Applicants are expected to provide a good faith estimate of costs associated with the proposed community solar project, as they are known at the time the Application is filed with the Board. This information will not be used in the evaluation of the proposed community solar project.

	Net Installed Cost (in \$)		
	Net Installed Cost (in \$/Watt)		
	Initial Customer Acquisition Cost (in \$/Watt)		
	Annual Customer Churn Rate (in %)		



Annual Operating Expenses (in c/kWh)

LCOE (in c/kWh)

2. Pursuant to N.J.A.C. 14:8-9.7(q), "community solar projects shall be eligible to apply, via a one-time election prior to the delivery of any energy from the facility, for SRECs or Class I RECs, as applicable, or to any subsequent compensations as determined by the Board pursuant to the Clean Energy Act."

For indicative purposes only, please indicate all local, state and federal tax incentives which will be applied to if the proposed community solar project is approved for participation in the Community Solar Energy Pilot Program:

Federal Business Energy Investment Tax Credit (ITC)

Federal Modified Accelerated Cost-Recovery System (MACRS) Depreciation

New Jersey Solar Energy Sales Tax Exemption

XII. Other Benefits

1. The proposed community solar facility is paired with another distributed energy resource:

a. Micro-grid project ☐ Yes ☒ No

b. Storage ☐ Yes ☒ No

c. Other (identify) ☒ Yes ☐ No

2. The proposed community solar facility provides grid benefits (e.g. congestion reduction) ☒ Yes ☐ No

If "Yes" to any, please explain how and provide supporting documents.

See Community Solar Application - Supporting Information section 3.2 (G)

4. The proposed community solar project will create temporary or permanent jobs in New Jersey

..... ☒ Yes ☐ No

If "Yes," estimated number of temporary jobs created in New Jersey

If "Yes," estimated number of permanent jobs created in New Jersey

5. The proposed community solar project will provide job training opportunities for local solar trainees ☒ Yes ☐ No

If "Yes," will the job training be provided through a registered apprenticeship? ☐ Yes ☒ No



If "Yes," identify the entity or entities through which job training is or will be organized (e.g. New Jersey GAINS program, partnership with local school):

XIII. Special Authorizations and Exemptions

1. Is the proposed community solar project co-located with another community solar facility (as defined at N.J.A.C. 14:8-9.2)? ☐ Yes ☒ No

If "Yes," please explain why the co-location can be approved by the Board, consistent with the provisions at N.J.A.C. 14:8-9.

2. Does this project seek an exemption from the 10-subscriber minimum? ☐ Yes ☒ No

If "Yes," please demonstrate below (and attach supporting documents as relevant):

- That the project is sited on the property of a multi-family building.
- That the project will provide specific, identifiable, and quantifiable benefits to the households residing in said multi-family building.

3. Specific sections throughout the Application Form are identified as optional only if: 1) the Applicant is a government entity (municipal, county, or state), and 2) the community solar developer will be selected by the Applicant via a RFP, RFQ, or other bidding process. Has the Applicant left those specific sections blank? ☐ Yes ☒ No

If "Yes," attach a letter describing the proposed bidding process. The Applicant must further commit to issuing said RFP, RFQ, or other bidding process within 90 days of the proposed project being approved by the Board for participation in the Community Solar Energy Pilot Program. The Applicant will be required to provide the information contained in those optional sections to the Board once it becomes known.

4. Has the proposed community solar project received, in part or in whole, a subsection (t) conditional certification from the Board prior to February 19, 2019? ☐ Yes ☒ No

If "Yes," the project may apply to participate in the Community Solar Energy Pilot Program if it commits to withdrawing the applicable subsection (t) conditional certification immediately if it is approved by the Board for participation in the Community Solar Energy Pilot Program. Attach a signed affidavit that the Applicant will immediately withdraw the applicable subsection (t)



3. Community Solar Application - Supporting Information

3.1 Community Solar Energy Project Description (Section B of Application)

A. EPC Developer (Section B, III)

The Cumberland Solar project will be built by a contracted EPC company to be selected after the project is awarded capacity in the Community Solar Energy Pilot Program. Cumberland Solar, as the project Applicant, will inform the BPU of the required name and contact details for the selected EPC contractor.

B. Estimated Date of Project Completion (Section B, VI)

The estimated date of project completion for Cumberland Solar is December 2020. This date is contingent on the following milestones being met:

- Notice of capacity award into the Pilot Program by November 9th, 2019
- Interconnection approval from local EDC by February 9th, 2020
- Land Use permit approval from local authority having jurisdiction by May 1st, 2020

C. Use restrictions (Section B, VII, 20)

D. Permit Readiness Checklist & PCER Meeting (Section B, VII, 1-2)

Cumberland Solar has completed the required NJDEP Permit Readiness Checklist (see Supporting Documentation section 4.4). The Office of Permit Coordination and Environmental Review has reviewed the checklist and provided a response letter that states that no further meeting is necessary. That response letter is included in Supporting Documentation section 4.4.

E. Hosting Capacity Map (Section B, VIII, 4)

Cumberland Solar is located within Atlantic City Electric (ACE) company's service territory. Included in the Supporting Documentation section 4.5 is a screen shot from the EDC Hosting Capacity Map. Section B, VIII, 4 of the Application assumes to use the information shown on the Hosting Capacity Map to evaluate the feasibility of the proposed community solar project and its worthiness of a program



capacity award. However, it must be noted that the Map and the information contained within is far from definitive and suffers the following issues:

- Has a disclaimer that states the values on the map are “not guaranteed and/or may change at any time,” that the map “may understate the hosting capacity”, and that an official evaluation requires a full interconnection application review
- Has a disclaimer that the secondary network information was published in June 2017 and has not been updated which reduces accuracy of the data contained therein
- Assumes that all of the pending generation listed on the circuit queue will be constructed

Additionally, Section B, VIII, 4 does not seem to consider the ability for a project to pay upgrade costs necessary to overcome any capacity issues shown on the Map, which is standard practice for most solar project development.

Based on the information outlined above, we feel that the hosting capacity map is insufficient to serve as the only means of evaluation of a projects feasibility and we respectfully request that the BPU not use it as a means to qualify/disqualify a project for an award in the Community Solar Program.

F. Subscriptions and Subscribers (Section B, IX, 5 - 8)



G. Project Cost (Section B, XI, 1)

A spreadsheet with the requested metrics and calculations highlighted is included in Supporting Documentation section 4.7.

3.2 Evaluation Criteria (Section B)

A. 30 Points: LMI and Environmental Justice (Section B, IX, 3)

Cumberland Solar is committed to meeting the Governor's and BPU's goal of designating a record setting 40% of the community solar program capacity towards the low and moderate income (LMI) community, a population that has mostly missed out on the economic and environmental benefits of renewable energy.

CES, the project subscriber organization, has 6+ years of experience working with low- and moderate-income residents in our operating community solar projects in Colorado, with over 115 participating residents and affordable housing organizations. We recognize the need for economic diversity in our projects for them to be successful. We have been effective by partnering with numerous Housing Authorities and organizations who provide services to the Low-Income and Low Moderate-Income sector, such as Energy Outreach Colorado.

As noted earlier, CES also has significant experience marketing renewable energy products to residents in New Jersey through the CleanPower Choice program.



B. 20 Points: Siting (Section B, VII, 2 - 19)

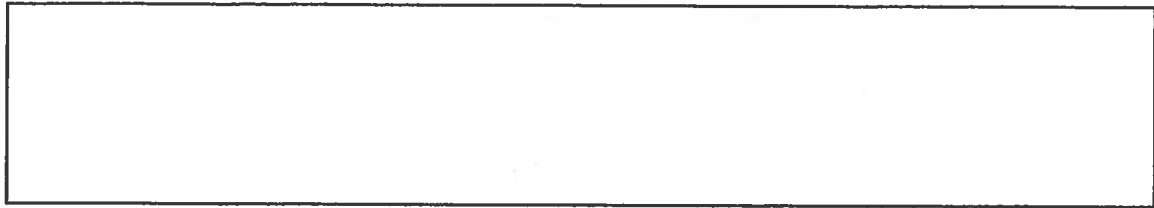
Though Cumberland Solar is located on agricultural land, the project will only be located on a portion of the total land that the landowner currently has in agricultural production. The revenue generated by the project will help the landowner continue to keep the rest of their land in agricultural production for the foreseeable future.

C. 5 Points: Siting Bonus (Section B, VII, 21)

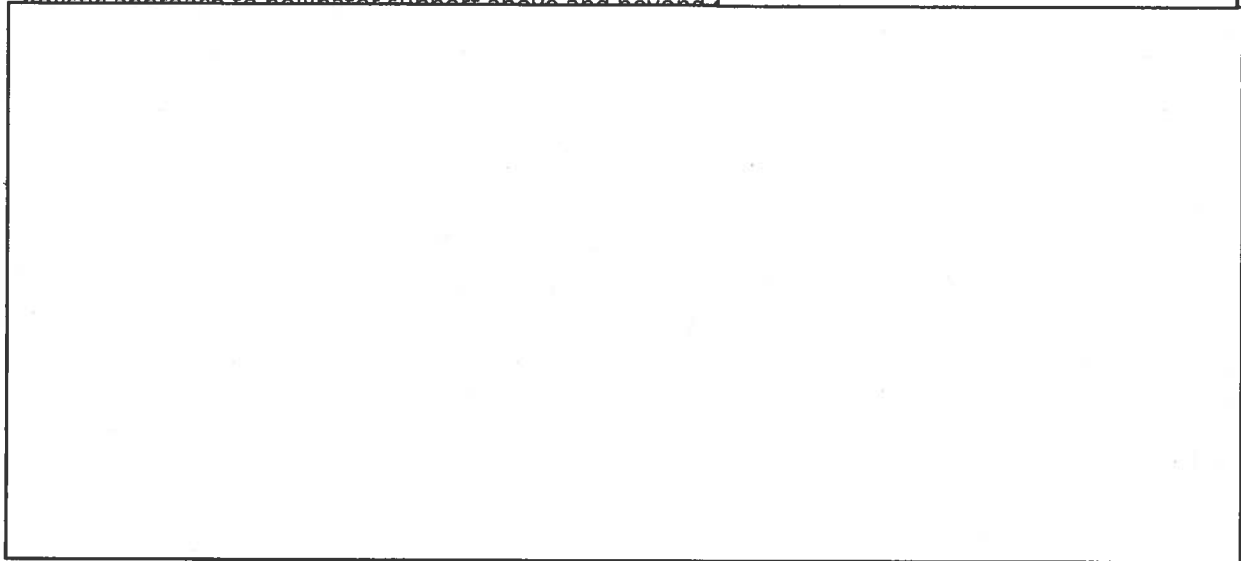
¹ Elnaz H. Adeh, Stephen P. Good, M. Calaf & Chad W. Higgins. "Solar PV Power Potential is Greatest Over Croplands." *Scientific Reports*, Volume 9, Article number: 11442 (2019). Web. 07 August 2019.

² Elnaz H. Adeh, John S. Selker, Chad W. Higgins. "Remarkable agrivoltaic influence on soil moisture, micrometeorology and water-use efficiency." *PLOS ONE* 13(11): e0203256 (2018). Web. 01 November 2018.

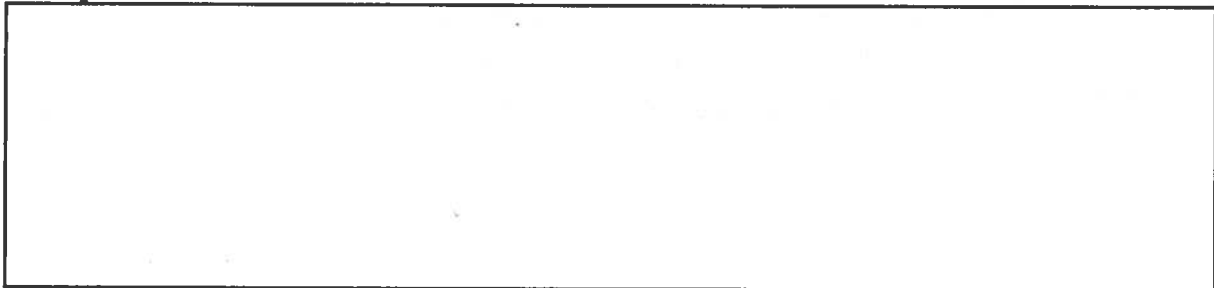
³ "Some Recommended Native New Jersey Plants for Pollinators." *U.S. Fish & Wildlife Service: New Jersey Field Office*. Web. Accessed August 2019.



- **Pollination Support:** The need for pollinator conservation efforts is paramount and in order to address the crises in the collapse of pollinator populations holistic approach to pollinator support above and beyond



The economic benefits of pollinators to the surrounding local agricultural operations and community at large is significant. Nearly two-thirds of all food products require successful pollination.⁵ In 2018, the value of that agriculture was *\$1.1 billion* in New Jersey alone.⁶ In an economic analysis by The Nature Conservancy, wild pollinators have been shown to increase both crop yields and value in New Jersey and a focus on maximizing pollinator habitat can produce a net economic benefit to the



⁴ "2017/18 Total Annual All Colony Loss." *Bee Informed Partnership*. Web. Accessed August 2019.

⁵ "NJ BIOLOGY TECHNICAL NOTE: Habitat Development for Pollinators." *New Jersey NRCS: Natural Resources Conservation Service*. Web. Accessed August 2019.

⁶ "NJ Farm Facts." *Jersey Fresh: NJ Department of Agriculture*. Web. Accessed September 2019.

⁷ Schuster, Elizabeth. "Wild Pollinator Habitat Benefits Agriculture." *Cool Green Science: The Nature Conservancy*. Web. 06 August 2013.

⁸ Fortuna, Carolyn. "Solar Power Is Playing A Growing Role To Save The Bees." *CleanTechnica*. Web. 12 August 2019.



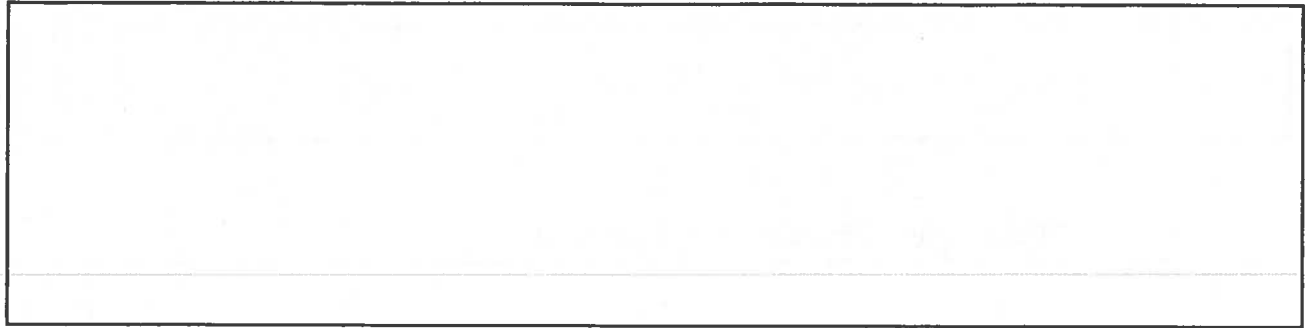
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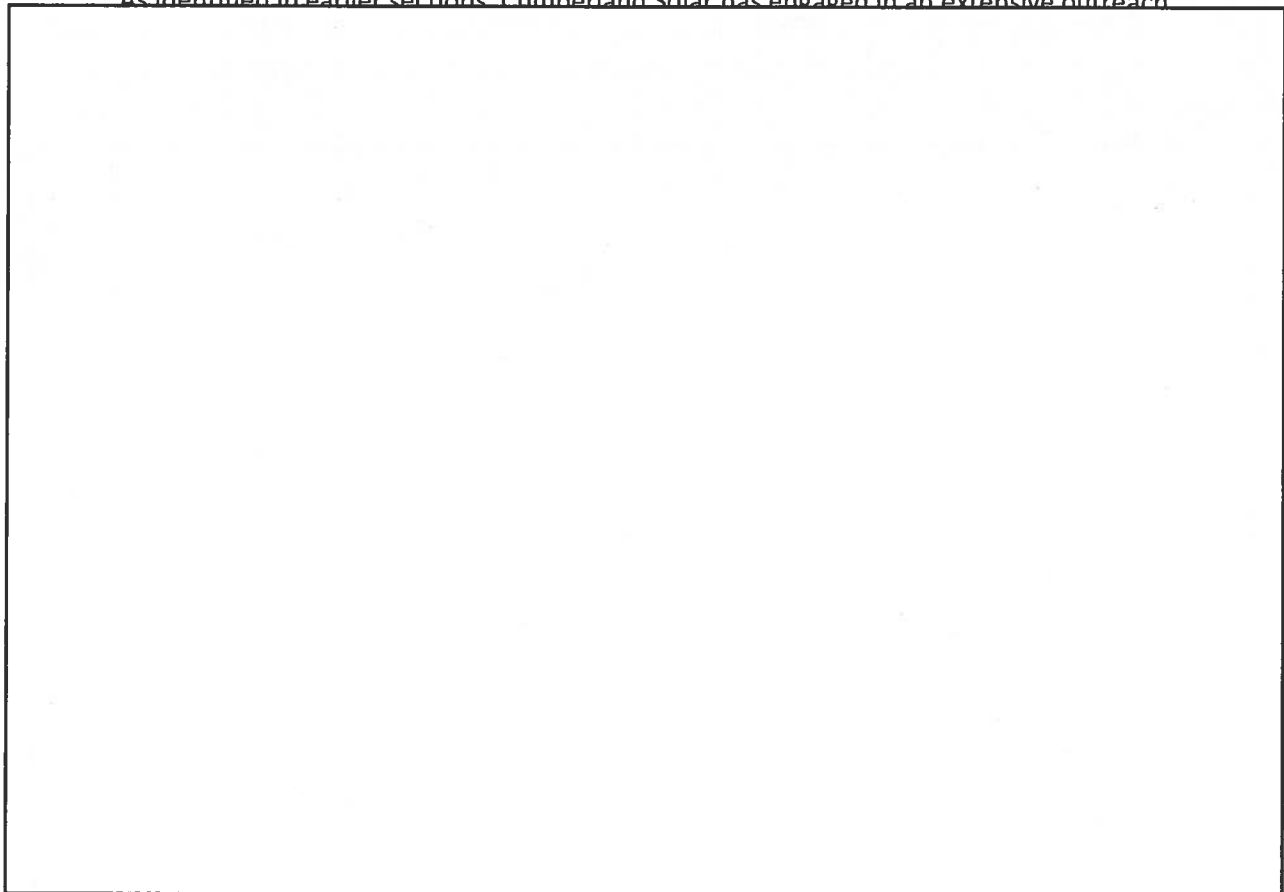
D. 15 Points: Product Offering (Section B, IX, 10)

Cumberland Solar plans the following as our product offering. Further information can be found on *Appendix A: Product Offering Questionnaire* located in the Appendix section of this application.



E. 10 points: Community & Environmental Justice Engagement (Section B, X, 1 - 3)

As identified in earlier sections, Cumberland Solar has engaged in an extensive outreach



All letters of support can be found in Supporting Documentation section 4.6. An overview document that lists the 60+ organizations across the state that we contacted during our outreach campaign can also be found in Supporting Documentation section 4.6. We are committed to finding strong partners to work with on this LMI project and look forward to pursuing additional conversations with many of these organizations upon an award of program capacity.

Additionally, Cumberland Solar, once awarded capacity in the Community Solar Energy Program will begin the process for obtaining a local land use permit and engage the community in a consultative



F. 10 Points: Subscribers (Section B, IX, 1- 4)

G. 10 Points: Other Benefits (Section B, XII, 1-5)

Cumberland Solar will provide (working with project partners where applicable) the following benefits to subscribers, community members, and other project stakeholders. We believe our approach meets the evaluation criteria, addressed in further detail below, in order to earn the full 10 points for this category.

➤

➤

➤



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4. Community Solar Application – Supporting Documentation

Content Overview

- 4.1 *Delineated Site Map (Section B, VI)*
- 4.2 *Proof of Site Control (Section B, VII, 1)*
- 4.3 *Excerpt - NJ Municipal Land Use Law - Solar as Inherently Beneficial Use (Section B, VII, 20)*
- 4.4 *NJDEP Office of Permit Coordination and Environmental Review (Section B, VIII, 1 - 2)*
 - A. **Permit Readiness Checklist**
 - B. **NJDEP PCER Proof in Lieu of Meeting**
- 4.5 *EDC Hosting Capacity (Section B, VIII, 4)*
 - A. **Hosting Capacity Map Screenshot**
 - B. **Hosting Capacity Map Disclaimer Page(s)**
- 4.6 *Community Engagement and Environmental Justice Letters of Support (Section B, IX, 5)*
 - A. **Affordable Housing Provider Letters of Support**
 - B. **Community & Environmental Justice Organization Letters of Support**
 - C. **Additional Sustainability Organization Letters of Support**
 - D. **LMI, Community, Environmental Justice Outreach Campaign Overview**
- 4.7 *Project Cost Spreadsheet Model (Section B, XI, 1)*
- 4.8 *Pollinator-Friendly Solar Scorecard*
- 5. Community Solar Application – Certifications (Section C)**
 - 5.1 *Applicant Certification*
 - 5.2 *Project Developer Certification*
 - 5.3 *Project Owner Certification*
 - 5.4 *Property Owner Certification*
 - 5.5 *Subscriber Organization Certification*
- 6. Community Solar Application – Appendix (Section D)**
 - 6.1 *Product Offering Questionnaire – Appendix A*
 - 6.2 *Required Attachments Checklist – Appendix B*

4.1: *Delineated Site Map*
(Section B, VI)



THIS ENTAILS THE DEVELOPMENT AND INSTALLATION OF A 2 MW-AC SOLAR ELECTRIC GENERATION FACILITY TO BE INTERCONNECTED WITH THE LOCAL ELECTRIC GRID AT THE DISTRIBUTION LEVEL.
COPYRIGHT © 2018 BY COMMUNITY ENERGY SOLAR, LLC (CES) ALL RIGHTS RESERVED. TO BE USED ONLY IN CONNECTION WITH THE ABOVE NAMED PROJECT FOR WHICH IT WAS CREATED.

LONG: 39.437390°, -75.128934°

ATION: VINELAND, NJ

E: 08.05.19

- 2 MW-AC PV PROJECT - IRVING AVENUE, CARMEL, NJ 08332



SYSTEM DESCRIPTION	
SYSTEM SIZE (AC STC)	2.0 MW
SYSTEM SIZE (DC STC)	2.6 MW
MODULES	(6832) 380 WATT
INVERTERS	(16) CPS-125
RACKING	SINGLE AXIS TRACKER

4.2: *Proof of Site Control*
(Section B, VII, 1)

Solar Energy Lease Agreement Cover Page

SOLAR ENERGY LEASE AGREEMENT

This SOLAR ENERGY LEASE AGREEMENT ("*Lease*") is entered into effective as of the Effective Date set forth below, by and between (i) **Cumberland Solar LLC** a Delaware limited liability company (the "*Company*"), and (ii) the landowner(s) set forth below ("*Landowner*"). Landowner and Company may be referred to below together as the "*Parties*" and each a "*Party*."

1. **Effective Date:** September 7, 2019
2. **Landowner(s):** Frank Paladino
3. **Leased Property:** The real property located in **Deerfield Township, New Jersey**, generally depicted on Exhibit B, and comprising **22.3 acres**. See §1.1.
4. **Development Feasibility Term:** Commences on the Effective Date and ends on the earliest to occur of Groundbreaking or two (2) years following the Effective Date.
5. **Commercial Term:** Commences on the Commercialization Date and ends thirty-five (35) years thereafter.
6. **Rent:**
Development Feasibility Term: per year. See §5.1.
Commercial Term: per acre per year, escalating at 1% annually.
See §5.2.

The following Exhibits are attached and incorporated herein by reference:

- Exhibit A** - Standard Terms and Conditions
- Exhibit B** - Description of Leased Property
- Exhibit C** - W-9 Form
- Exhibit D** - Form of Memorandum of Lease

Company:

Cumberland Solar LLC

By: 

Name: Brent Beerley

Title: Manager

Landowner(s):



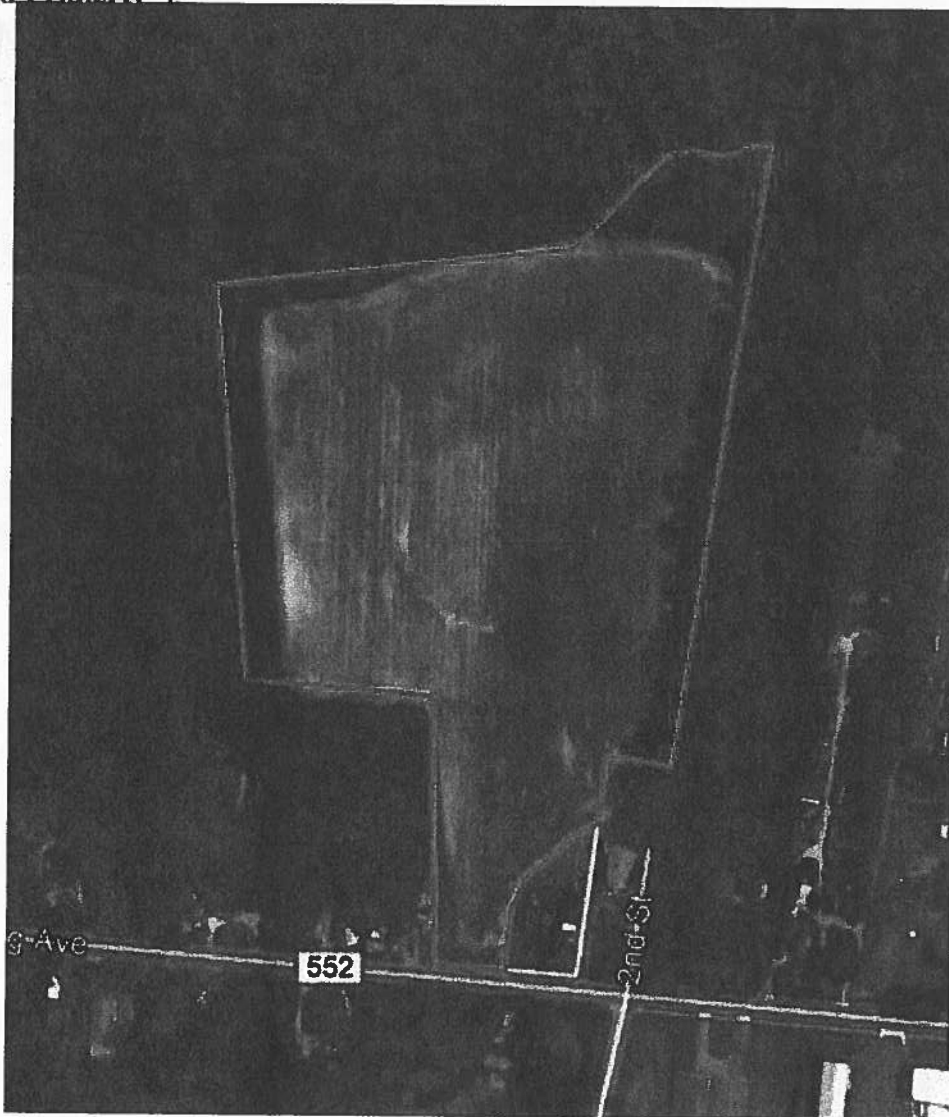
Frank M. Paladino

EXHIBIT B

- DESCRIPTION OF LEASED PROPERTY -

Landowner owns the real property located at **532 IRVING AVE** in **Deerfield Township, Cumberland County, New Jersey** more specifically described by **New Jersey Department of Treasury, Division of Taxation as Municipality: 0603 Block: 79 Lot: 36 Qualifier: QFARM** ("**Landowner's Property**").

Landowner desires to lease to Company all that certain portion of Landowner's Property, as depicted outlined in red in the drawing below, comprising a total of approximately **22.3 acres** ("**Leased Property**").



**4.3: *Excerpt - NJ Municipal Land Use Law -
Solar as Inherently Beneficial Use
(Section B, VII, 20)***

CHAPTER 146

AN ACT concerning certain property uses and structures under local zoning ordinances and amending P.L.1975, c.291.

BE IT ENACTED by the Senate and General Assembly of the State of New Jersey:

1. Section 3.1 of P.L.1975, c.291 (C.40:55D-4) is amended to read as follows:

C.40:55D-4 Definitions; D to L.

3.1. "Days" means calendar days.

"Density" means the permitted number of dwelling units per gross area of land to be developed.

"Developer" means the legal or beneficial owner or owners of a lot or of any land proposed to be included in a proposed development, including the holder of an option or contract to purchase, or other person having an enforceable proprietary interest in such land.

"Development" means the division of a parcel of land into two or more parcels, the construction, reconstruction, conversion, structural alteration, relocation or enlargement of any building or other structure, or of any mining excavation or landfill, and any use or change in the use of any building or other structure, or land or extension of use of land, for which permission may be required pursuant to this act.

"Development potential" means the maximum number of dwelling units or square feet of nonresidential floor area that may be constructed on a specified lot or in a specified zone under the master plan and land use regulations in effect on the date of the adoption of the development transfer ordinance, and in accordance with recognized environmental constraints.

"Development regulation" means a zoning ordinance, subdivision ordinance, site plan ordinance, official map ordinance or other municipal regulation of the use and development of land, or amendment thereto adopted and filed pursuant to this act.

"Development transfer" or "development potential transfer" means the conveyance of development potential, or the permission for development, from one or more lots to one or more other lots by deed, easement, or other means as authorized by ordinance.

"Development transfer bank" means a development transfer bank established pursuant to section 22 of P.L.2004, c.2 (C.40:55D-158) or the State TDR Bank.

"Drainage" means the removal of surface water or groundwater from land by drains, grading or other means and includes control of runoff during and after construction or development to minimize erosion and sedimentation, to assure the adequacy of existing and proposed culverts and bridges, to induce water recharge into the ground where practical, to lessen nonpoint pollution, to maintain the integrity of stream channels for their biological functions as well as for drainage, and the means necessary for water supply preservation or prevention or alleviation of flooding.

"Environmental commission" means a municipal advisory body created pursuant to P.L.1968, c.245 (C.40:56A-1 et seq.).

"Erosion" means the detachment and movement of soil or rock fragments by water, wind, ice and gravity.

"Final approval" means the official action of the planning board taken on a preliminarily approved major subdivision or site plan, after all conditions, engineering plans and other requirements have been completed or fulfilled and the required improvements have been installed or guarantees properly posted for their completion, or approval conditioned upon the posting of such guarantees.

"Floor area ratio" means the sum of the area of all floors of buildings or structures compared to the total area of the site.

"General development plan" means a comprehensive plan for the development of a planned development, as provided in section 4 of P.L.1987, c.129 (C.40:55D-45.2).

"Governing body" means the chief legislative body of the municipality. In municipalities having a board of public works, "governing body" means such board.

"Historic district" means one or more historic sites and intervening or surrounding property significantly affecting or affected by the quality and character of the historic site or sites.

"Historic site" means any real property, man-made structure, natural object or configuration or any portion or group of the foregoing of historical, archeological, cultural, scenic or architectural significance.

"Inherently beneficial use" means a use which is universally considered of value to the community because it fundamentally serves the public good and promotes the general welfare. Such a use includes, but is not limited to, a hospital, school, child care center, group home, or a wind, solar or photovoltaic energy facility or structure.

"Instrument" means the easement, credit, or other deed restriction used to record a development transfer.

"Interested party" means: (a) in a criminal or quasi-criminal proceeding, any citizen of the State of New Jersey; and (b) in the case of a civil proceeding in any court or in an administrative proceeding before a municipal agency, any person, whether residing within or without the municipality, whose right to use, acquire, or enjoy property is or may be affected by any action taken under this act, or whose rights to use, acquire, or enjoy property under this act, or under any other law of this State or of the United States have been denied, violated or infringed by an action or a failure to act under this act.

"Land" includes improvements and fixtures on, above or below the surface.

"Local utility" means any sewerage authority created pursuant to the "sewerage authorities law," P.L.1946, c.138 (C.40:14A-1 et seq.); any utilities authority created pursuant to the "municipal and county utilities authorities law," P.L.1957, c.183 (C.40:14B-1 et seq.); or any utility, authority, commission, special district or other corporate entity not regulated by the Board of Regulatory Commissioners under Title 48 of the Revised Statutes that provides gas, electricity, heat, power, water or sewer service to a municipality or the residents thereof.

"Lot" means a designated parcel, tract or area of land established by a plat or otherwise, as permitted by law and to be used, developed or built upon as a unit.

2. Section 3.4 of P.L.1975, c.291 (C.40:55D-7) is amended to read as follows:

C.40:55D-7 Definitions; S to Z.

3.4. "Sedimentation" means the deposition of soil that has been transported from its site of origin by water, ice, wind, gravity or other natural means as a product of erosion.

"Sending zone" means an area or areas designated in a master plan and zoning ordinance, adopted pursuant to P.L.1975, c.291 (C.40:55D-1 et seq.), within which development may be restricted and which is otherwise consistent with the provisions of section 8 of P.L.2004, c.2 (C.40:55D-144).

"Site plan" means a development plan of one or more lots on which is shown (1) the existing and proposed conditions of the lot, including but not necessarily limited to topography, vegetation, drainage, flood plains, marshes and waterways, (2) the location of all existing and proposed buildings, drives, parking spaces, walkways, means of ingress and

egress, drainage facilities, utility services, landscaping, structures and signs, lighting, screening devices, and (3) any other information that may be reasonably required in order to make an informed determination pursuant to an ordinance requiring review and approval of site plans by the planning board adopted pursuant to article 6 of this act.

"Standards of performance" means standards (1) adopted by ordinance pursuant to subsection 52d. regulating noise levels, glare, earthborn or sonic vibrations, heat, electronic or atomic radiation, noxious odors, toxic matters, explosive and inflammable matters, smoke and airborne particles, waste discharge, screening of unsightly objects or conditions and such other similar matters as may be reasonably required by the municipality or (2) required by applicable federal or State laws or municipal ordinances.

"State Transfer of Development Rights Bank," or "State TDR Bank," means the bank established pursuant to section 3 of P.L. 1993, c.339 (C.4:1C-51).

"Street" means any street, avenue, boulevard, road, parkway, viaduct, drive or other way (1) which is an existing State, county or municipal roadway, or (2) which is shown upon a plat heretofore approved pursuant to law, or (3) which is approved by official action as provided by this act, or (4) which is shown on a plat duly filed and recorded in the office of the county recording officer prior to the appointment of a planning board and the grant to such board of the power to review plats; and includes the land between the street lines, whether improved or unimproved, and may comprise pavement, shoulders, gutters, curbs, sidewalks, parking areas and other areas within the street lines.

"Structure" means a combination of materials to form a construction for occupancy, use or ornamentation whether installed on, above, or below the surface of a parcel of land.

"Subdivision" means the division of a lot, tract or parcel of land into two or more lots, tracts, parcels or other divisions of land for sale or development. The following shall not be considered subdivisions within the meaning of this act, if no new streets are created: (1) divisions of land found by the planning board or subdivision committee thereof appointed by the chairman to be for agricultural purposes where all resulting parcels are 5 acres or larger in size, (2) divisions of property by testamentary or intestate provisions, (3) divisions of property upon court order, including but not limited to judgments of foreclosure, (4) consolidation of existing lots by deed or other recorded instrument and (5) the conveyance of one or more adjoining lots, tracts or parcels of land, owned by the same person or persons and all of which are found and certified by the administrative officer to conform to the requirements of the municipal development regulations and are shown and designated as separate lots, tracts or parcels on the tax map or atlas of the municipality. The term "subdivision" shall also include the term "resubdivision."

"Transcript" means a typed or printed verbatim record of the proceedings or reproduction thereof.

"Variance" means permission to depart from the literal requirements of a zoning ordinance pursuant to sections 47 and subsections 29.2b., 57c. and 57d. of this act.

"Wind, solar or photovoltaic energy facility or structure" means a facility or structure for the purpose of supplying electrical energy produced from wind, solar, or photovoltaic technologies, whether such facility or structure is a principal use, a part of the principal use, or an accessory use or structure.

"Zoning permit" means a document signed by the administrative officer (1) which is required by ordinance as a condition precedent to the commencement of a use or the erection, construction, reconstruction, alteration, conversion or installation of a structure or building and (2) which acknowledges that such use, structure or building complies with the provisions

of the municipal zoning ordinance or variance therefrom duly authorized by a municipal agency pursuant to sections 47 and 57 of this act.

3. This act shall take effect immediately.

Approved November 20, 2009.

**4.4: *NJDEP Office of Permit Coordination
and Environmental Review
(Section B, VIII, 1-2)***

- A. Permit Readiness Checklist**
- B. NJDEP PCER Proof in Lieu of Meeting**

Updated 10/11/16

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW

PERMIT READINESS CHECKLIST

FOR PCER OFFICE USE ONLY

DATE RECEIVED ____

PRC ID NUMBER ____

Completion of this form will assist the Department in determining what permits might be needed to authorize a project and to insure that all appropriate programs attend a pre-application meeting. Please fill out the below form as completely as possible, noting any areas you are not sure of and including any information about the project and the site that might help the Department determine the permitting needs of the project.¹

1. Please complete the following questions if applicable and return to the Department with a **1 to 2 page narrative description of project, its function, and its benefits; as well as a site plan, maps, aerial photos, GIS shape files, etc.**

A. GENERAL INFORMATION

1. Name of Proposed Project:
Cumberland Solar LLC
2. Consultant/Contact Information (if any):
Jesse Cutaia
Jesse.cutaia@communityenergyinc.com
917-750-6383
3. Name/Address of Prospective Applicant:
Cumberland Solar LLC

Address/tel./fax:
Cumberland Solar LLC
c/o Community Energy Solar, LLC
Attn: Controller
Three Radnor Corporate Center - Suite 300
100 Matsonford Road
Radnor, PA 19087
866-946-3123

¹ Please be advised that this form is not a permit application. To receive authorization, approval, or a permit to conduct regulated activities, a formal application must be filed and a formal permit or authorization issued by the appropriate Bureau within the Department prior to the conduct of regulated activity. This form is used solely for the Department's preliminary review and discussion of this project to determine what permits or authorizations may be needed to conduct the proposed activity. Any guidance offered to the applicant during this process is not binding on the Department or the applicant and a final response can only be rendered through the actual issuance of permits, approvals, or authorizations.

4. Does the project have any existing NJDEP ID#s assigned? i.e., Case number, Program Interest (PI)#, Program ID#? NO

B. PROPOSED PROJECT LOCATION

Street Address/munic: 532 Irving Ave, Deerfield Township (0603)
County Cumberland County Zip Code 08332
Block No. 79 Lot No. 36
X Coordinate in State Plane (project centroid) 95859.014 mE
Y Coordinate in State Plane (project centroid) 67240.059 mN

C. PROPOSED ACTIVITY DESCRIPTION AND SCHEDULE

1. Project Type: New Construction YES Brownfield Redevelop.
Alternative Energy YES Other (Please describe)
- a) Estimated Schedule:
- Date permits needed or desired by: April 1st, 2020
 - Beginning construction date: June 1st, 2020
 - Construction completion: October 1st, 2020
 - Operation of facility date: December 1st, 2020
- b) Funding Source: Is any Federal Funding being used for this project? No
State Funding over 1 million dollars? No
Is funding secured at this time? No Is funding conditional? Yes If so, on what?
Approval into Year 1 of NJ Community Solar Pilot Program (NJCSPP)
- c) Is the project contingent on receiving the identified funding? Yes
If yes, explain NJCSPP approval makes project eligible for NJ SREC's and retail utility rate compensation
- d) What DEP permits do you think you need for this project? (The Department will confirm this through the PRC process).
- i. Freshwater Wetlands LOI
 - ii. Flood Hazard Area Permit
 - iii. Individual Stormwater Permit
 - iv. Stormwater Management and Erosion Plan
2. For additional guidance on Department permits, please refer to the Permit Identification Form (PIF) which will be forwarded upon request. The PIF does not need to be filled out or submitted to the Department.
- a) Which Department(s), Bureau(s), and staff have you contacted regarding your proposed project? None as of June 2019
- b) Are there any Department permits that will need to be modified as a result of this project. Please explain and identify the project reviewer of the permit to be modified.
No
- c) Please identify any pre-permit actions or modifications you have applied for or obtained from the Department or other state agencies for this project:
- 1) Water Quality Management Plan consistency None
 - 2) Highlands Consistency N/A
 - 3) Wetland Delineation (LOI) None as of June 2019

- 4) Tidelands Conveyance N/A
- 5) Flood Hazard Jurisdiction or determinations None as of June 2019
- 6) Water Allocation N/A
- 7) Site Remediation RAW, Remedial Action Permit – Soil and or Groundwater, NJPDES Discharge to Ground Water, NJPDES Discharge to Surface Water, No Further Action Response Action Outcome N/A
- 8) Landfill Disruption Approval N/A
- 9) Landfill Closure Plan N/A
- 10) Other None

3. Please submit this Permit Readiness Checklist form, completed to the extent possible, electronically to Ruth.Foster@dep.nj.gov and Megan.Brunatti@dep.nj.gov and one (1) copy via mail² with the following items if available:

- (a) The completed Permit Readiness Checklist;
- (b) A description of the proposed project;
- (c) Any overarching regulatory or policy call(s) or guidance that the Department must make or make known prior to the receipt of the application to determine the project's feasibility, regulatory, or review process.
- (d) USGS map(s) with the site of the proposed project site boundaries clearly delineated (including the title of the USGS quadrangle sheet from which it was taken)³;
- (e) Aerial photos/GIS information regarding the site;
- (f) A site map including any known environmental features (wetlands, streams, buffers, etc⁴);
- (g) Site plans to the extent available;
- (h) Street map indicating the location of the proposed project;
- (i) Any other information that you think may be helpful to the Department in reviewing this project.
- (j) List of any local or regional governments or entities, their historical involvement in this project or site, identification of conflicts with DEP rules; with contact names and information whose attendance/input would be helpful in facilitating this project, ie Soil Conservation Districts, health departments, local zoning officials, etc.

D. The following are questions by Program to guide the Department in its determination of what permits may be needed to authorize this project. If the questions do not apply to the proposed project please indicate N/A. Please include any other information you think may be helpful for the Department to determine which permits are needed.

WATER AND WASTE WATER INFORMATION

² Submit to: New Jersey Department of Environmental Protection
Office of Permit Coordination and Environmental Review
P.O. Box 420, Mail Code 07J
Trenton, New Jersey 08625
Street Location: 401 East State Street, 7th Floor East Wing
Telephone Number: (609) 292-3600
Fax Number: (609) 292-1921

³ USGS maps may be purchased from NJDEP, Maps and Publications, P.O. Box 420, Trenton 08625-0420; (609) 777-1038

⁴ NJGIS information

DEP Safe Drinking Water Program (609) 292-5550

<http://www.nj.gov/dep/watersupply/>

Is the project located within an existing water purveyor service area? If yes, which one? N/A

Will the project affect any land or water controlled by a Water Supply Authority or water purveyor in New Jersey? If so, please identify and explain. No

Does the purveyor have adequate firm capacity and allocation to support project demand? N/A

Do water pipes currently extend to the project location? N/A

If not, is it located within a franchise area? N/A

Does the project have an approved Safe Drinking Water main extension permit? N/A

Will the project affect any land or water controlled by a Water Supply Authority or water purveyor in New Jersey? If so, please identify and explain. No

DEP Water Allocation Program (609) 292-2957

<http://www.nj.gov/dep/watersupply>

Is the project seeking a new ground water allocation or modification? If yes, does the project have all necessary well location and safe drinking water permits? No

Is the project located within an area of critical water supply concern? N/A

Will this project have the capability to divert more than 100,000 gallons per day from a single source or a combination of surface or groundwater sources? No

Will this project draw more than 100,000 gallons per day of ground or surface water for construction or operation? No

WATER POLLUTION MANAGEMENT ELEMENT

DIVISION OF WATER QUALITY

Non-Point Pollution Control (609) 292-0407

http://www.nj.gov/dep/dwq/bnpc_home.htm

The **Bureau of Non-Point Pollution Control (BNPC)** is responsible for protecting and preserving the state's groundwater resources through the issuance of NJPDES Discharge to Groundwater Permits and is responsible for permitting industrial facilities and municipalities under NJPDES for discharges of stormwater to waters of the State.

Groundwater Section (609) 292-0407

This Program does not issue NJPDES-DGW permits for remediation operations.

The following definitions should be used to assist in identifying discharge activities:

Subsurface disposal system is any contrivance that introduces wastewater directly to the subsurface environment, such as, but not limited to: septic systems, recharge beds, trench systems, seepage pits, and dry wells.

Injection/recharge wells are constructed such that they are deeper than they are wide, receive effluent via gravity flow or pumping, and include dry wells and seepage pits.

Overland flow is the introduction of wastewater to the ground surface, over which the wastewater travels and eventually percolates or evaporates.

Industrial wastewater is any wastewater or discharge which is not sanitary or domestic in nature, including non-contact or contact cooling water, process wastewater, discharges from floor drains, air conditioner condensate, etc.

1. Will the project/facility have a sanitary wastewater design flow which discharges to groundwater in excess of 2,000 gallons per day? No

2. Will the project/facility generate a discharge to groundwater of industrial wastewater in any quantity? No

3. Will the project/facility involve the discharge to groundwater by any of the following activities or structures, or include as part of the design any of these activities or structures? No

Please indicate which:

Upland CDF (Dredge Spoils) Spray Irrigation N/A

Overland Flow Subsurface Disposal System (UIC) N/A

Landfill Infiltration/Percolation Lagoon N/A

Surface Impoundment N/A

Please specify the source of wastewater for every structure identified above (e.g., sanitary wastewater to a subsurface disposal system or non-contact cooling water to a dry well): N/A

Please specify lining materials for each lined structure identified as being used by the proposed project and give its permeability in cm/sec (e.g., 8-inch thick concrete lined evaporation pond at 10-7 cm/sec): N/A

Does your project/facility include an individual subsurface sewage disposal system design for a facility with a design flow less than 2,000 gallons per day which does not strictly conform to the State's standards? No

Does your project involve 50 or more realty improvements? No

DEP Pretreatment and Residuals program (609) 633-3823

Will the project involve the discharge of industrial/commercial wastewater to a publicly owned treatment works (POTW)? No

If yes, name of POTW: _____

Volume of wastewater (gpd): _____

Will/does this project involve the generation, processing, storage, transfer and/or distribution of industrial or domestic residuals (including sewage sludge, potable water treatment residuals and food processing by-products) generated as a result of wastewater treatment. No If so, please explain.

Stormwater Program (609) 633-7021

<http://www.njstormwater.org/>

http://www.state.nj.us/dep/dwq/ispp_home.html

Will your site activity disturb more than one acre? Yes

Will any industrial activity be conducted at the site where material is exposed to the rain or other elements? Yes

Does your facility have an existing NJPDES permit for discharge of stormwater to surface groundwater?

No

Is your facility assigned one of the following Standard Industrial Classification (SIC) Codes? No
(To determine your SIC Code see the box "Industry Code" on your New Jersey Department of Labor Quarterly Contribution Report.)

Surface Water Permitting (609) 292-4860

<http://www.nj.gov/dep/dwq/swp.htm>

Will this wastewater facility discharge to Surface Water? No

If yes, state the name of the proposed receiving stream N/A

Describe the proposed discharge of wastewater to Surface Water N/A

If no, how is the wastewater proposed to be discharged (e.g., to be conveyed to another STP, Publicly Owned Treatment Works, etc.) N/A

MUNICIPAL FINANCE AND CONSTRUCTION ELEMENT

Treatment Works Approvals (609) 984-4429

<http://www.nj.gov/dep/dwq/twa.htm>

Will this project include the construction, expansion or upgrade of a domestic or industrial wastewater treatment facility or an off-site subsurface disposal system that generates more than 2,000 gallons per day? No If yes, explain _____

Will the project result in a construction design of more than 8000 gallons of water discharge per day? No

Office of Water Resources Management Coordination (609)777-4359

<http://www.state.nj.us/dep/wrm>

Sewer Service

Is the project in an approved sewer service area for the type of waste water service needed? N/A
If yes, what is the name of the sewer service area? _____

Has this project received endorsement from the appropriate sewer authority with adequate conveyance and capacity? N/A

Do waste water pipes currently extend to the project location? N/A

Is the project consistent with and in an area covered by an up to date Wastewater Management Plan? N/A

Will an amendment to the existing WQMP be required to accommodate this project? N/A

If tying into an offsite treatment plant, is the capacity and conveyance system currently available? N/A

What is the volume of wastewater that will be generated by the project? None

DEP Land Use Regulation (609) 777-0454
<http://www.nj.gov/dep/landuse>

Does the project involve development at or near, or impacts to the following; describe the type and extent of development in regards to location and impacts to regulated features:

Water courses (streams) Yes, development near the Lebanon Branch stream and tributary. Development will stay outside of stream and tributary buffer areas and will have no impact to regulated features.

State Open Waters? No

Freshwater Wetlands and/or freshwater wetland transition areas? Yes, development near the Lebanon Branch associated wetlands and wetland transition areas. Development will stay outside of wetlands, wetland transition areas and associated buffer areas and will have no impact to regulated features.

Flood Hazard areas and/or riparian buffers Yes, development near the Lebanon Branch associated flood hazard areas and riparian buffers. Development will make every attempt stay outside of regulated features and any impact will be minimal.

Waterfront development areas No

Tidally Flowed Areas No

Bureau of Tidelands Management: http://www.nj.gov/dep/landuse/tl_main.html No

The CAFRA Planning Area? <http://www.state.nj.us/dep/gis/cafralayers.htm> No

DEP NATURAL AND HISTORIC RESOURCES

Green Acres Program (609) 984-0631
<http://www.nj.gov/dep/greenacres>

Does the project require a diversion of State property or parkland, lease of same, lifting of a Green Acres of Land Use deed restriction, or work within an existing easement? No Will any activity occur on State owned lands? No If so please describe. _____

Does the project require a diversion of property funded with federal Land and Water Conservation Funding? No. If so, please describe _____.

Does the project include activities that are under the jurisdiction of the Watershed Property Review Board? No If so, please describe. _____ Has the Watershed Property Review Board made a jurisdictional determination? N/A

Division of Parks and Forestry: State Park Service 609-292-2772

Is the temporary use of State lands administered by the New Jersey State Park Service required for pre-construction, construction and/or post construction activities? No If so, please describe.

Division of Parks and Forestry: State Forestry Services (609) 292-2530
<http://www.nj.gov/dep/parksandforests/forest>

Forest clearing activities/No Net Loss Reforestation Act

Will construction of the project result in the clearing of ½ acres or more of forested lands owned or maintained by a State entity? No
If so, how many acres? _____

Division of Parks and Forestry: Office of Natural Lands Management (609) 984-1339
<http://www.nj.gov/dep/parksandforests/natural/index.html>

Is the project within a State designated natural area as classified in the Natural Areas System Rules at N.J.A.C. 7:5A? No
If so, please describe. _____

State Historic Preservation Office – SHPO (609) 292-0061
<http://www.state.nj.us/dep/hpo/index.htm>

Is the site a Historic Site or district on or eligible for the State or National registry? No
Will there be impacts to buildings over 50 years old? No
Are there known or mapped archeological resources on the site? No

Dam Safety Program (609) 984-0859
<http://www.nj.gov/dep/damsafety>

Will the project involve construction, repair, or removal of a dam? No
If so, please describe _____

Fish and Wildlife (609) 292-2965
<http://www.nj.gov/dep/fgw>

Will there be any shut off or drawdown of a pond or a stream? No

Threatened and Endangered Species Program

Are there records of any Threatened and Endangered species, plant, or animal in this project area? No

Will the proposed development affect any areas identified as habitat for Threatened or Endangered Species? No

SITE REMEDIATION PROGRAM (609) 292-1250

<http://www.nj.gov/dep/srp/>

Office of Brownfield Reuse (609) 292-1251

Is the project located on or adjacent to a known or suspected contaminated site? No

<http://www.nj.gov/dep/srp/kcsnj/>

Is the project within a designated Brownfield Development Area? No

<http://www.nj.gov/dep/srp/brownfields/bda/index.html>

Has a No Further Action, Response Action Outcome, or Remedial Action Permit been issued for the entire project area? N/A

If not, what is the current status of remediation activities? N/A Please include remedial phase, media affected and contaminant(s) of concern.

Name of current SRP Case Manager or Licensed Site Remediation Professional and Preferred Identification (PI) Number N/A

Is the applicant a responsible party for contamination at the property? N/A

Is the project located on a landfill that will be redeveloped for human occupancy? No If yes, is there an approved Landfill Closure Plan? N/A

Dredging and Sediment Technology (609) 292-1250

Does the project involve dredging or disposing of dredge materials? No

SOLID AND HAZARDOUS WASTE MANAGEMENT PROGRAM (609) 633-1418

<http://www.nj.gov/dep/dshw/>

Does the project receive, utilize, or transport solid or hazardous wastes? No

Will the project involve the disposing of hazardous Substances per 40 CFR part 261 and NJAC 7:26? No

Will the project include operation of a solid waste facility according to N.J.A.C. 7:26-1-et seq.? No

Is the project a solid waste facility or recycling center? No

Is the project included in the appropriate county Solid Waste Management Plan? N/A Explain _____

AIR QUALITY PERMITTING PROGRAM

<http://www.nj.gov/dep/aqpp>

Will activity at the site release substances into the air? No

Does the project require Air Preconstruction permits per N.J.A.C. 7:27-8.2©1? No

Will your project require Air Operating permits (N.J.A.C. 7:27--22.1)? No

Will the project result in a significant increase in emissions of any air contaminant for which the area is nonattainment with the national ambient air quality standards (all of NJ for VOC and NOx; 13 counties for fine particulates), thereby triggering the Emission Offset Rule at NJAC7:27-18? No

Will the project emit group 1 or 2 TXS toxic substances listed in NJAC 7:27-17? No

Will the project emit hazardous air pollutants above reporting thresholds in NJAC7:27 8, Appendix 1?
No

Will the project result in stationary diesel engines (such as generators or pumps) or mobile diesel engines (such as bulldozers and forklifts) operating on the site? If so, which?

Yes, forklifts, skidsteers, backhoes, and other diesel engine construction vehicles will be used during the construction of the project. No diesel engines will be used during operation of the project.

RADIATION PROTECTION AND RELEASE PREVENTION (609) 984-5636
www.state.nj.us/dep/rpp

Will the operation receive, store or dispose of radioactive materials? No

Will the operation employ any type of x-ray equipment? No

DISCHARGE PREVENTION PROGRAM (DPCC) (609) 633-0610
www.nj.gov/dep/rpp

Is this a facility as defined in N.J.A.C. 7:1E in which more than 20,000 gallons of Hazardous substances other than petroleum or greater than 200,000 gallons of petroleum are stored? No

TOXIC CATASTROPHE PREVENTION ACT (TCPA) (609) 633-0610

[HTTP://WWW.STATE.NJ.US/DEP/RPP/BRP/TCPA/INDEX.HTM](http://WWW.STATE.NJ.US/DEP/RPP/BRP/TCPA/INDEX.HTM)

Is this a facility that handles or stores greater than a threshold amount of extraordinarily hazardous substances as defined in N.J.A.C. 7:31? No

Bureau of Energy and Sustainability (609)633-0538
<http://www.nj.gov/dep/aqes/energy.html>
<http://www.nj.gov/dep/aqes/sustainability.html>

GREEN DESIGN (609) 777-4211

Have you incorporated green design features into this project? Examples of green design features may include: renewable energy, water conservation and use of low impact design for stormwater. Yes, this is a renewable energy (solar) facility that will also incorporate sustainability based land enhancements including pollinator seed mixes, native species for screening plantings, and allow for soil regeneration of the land under project control.

Will this project be certified by any of the following green building rating systems?

New Jersey Green Building Manual? No

<http://greenmanual.rutgers.edu/>

US Green Building Council's LEED (Leadership in Energy and Environmental Design)? No
<http://www.usgbc.org/>

ASHRAE Standard 189.1? No
<http://www.ashare.org/publications/page/927>

National Green Building Standard ICC 700-2008? No
<http://www.nahbgreen.org>

USEPA's ENERGY STAR? No
http://www.energystar.gov/index.cfm?c=business.bus_index

INNOVATIVE TECHNOLOGY (609) 292-0125

Is an environmental and energy innovative technology included in this project? Yes

Is this technology used for manufacturing alternative fuels? No

- If yes, what is the non-fossil feedstock(s) used for manufacturing the fuels?

Biomass

Municipal Solid Waste

Other Non-Fossil Feedstocks

- What will be the primary use of the manufactured alternative fuels?

CHP System

Micro Turbine

Fuel Cells

For other innovative technology type, what is the proposed application?

Energy

Site Remediation

Drinking Water

Wastewater

For other innovative energy systems, what is the source of energy?

Solar

Wind

Tidal/Wave

Hydroelectric

Geothermal

Is there independent third-party performance data for the technology? Yes

Has the technology been verified by an independent third-party entity? Yes

Is this technology in use at any other location at this time? Yes

- If yes, please provide location Thousands of sites across NJ

DEP COMPLIANCE AND ENFORCEMENT

Does the applicant have outstanding DEP enforcement violations, and if so, what is the status? No

If yes, please identify the case, case manager, program, and phone number. N/A

Does the proposed project facilitate compliance where there is a current violation or ACO? N/A

COMMUNITY ENGAGEMENT (609)292-2908

The Department is committed to the principles of meaningful and early community engagement in the project's approval process. The Department has representatives available who could discuss community engagement issues with you and we encourage this communication to take place at the earliest possible time.

- (a) What community groups and stakeholders have you identified that may be interested in or impacted by this project? Local conservation and environmental justice groups, job training organizations, land use groups, neighbors, LMI communities, etc
- (b) How have you or will you engage community and stakeholders in this project? Please supply individuals or stakeholder groups contacted or who have been identified for community engagement. We plan to reach out to the stakeholders identified above once our project has been approved through the NJ Community Solar Pilot Program.
- (c) What are the potential impacts of this project on the community? Potential visual impact (depending on the viewer).
- (d) How do you intend to mitigate these potential impacts? Site the project to make use of existing natural screening and supplement with additional screening as necessary
- (e) What are the community concerns or potential concerns about this project? See (c)
- (f) How do you intend to address these concerns? See (d)
- (g) As part of this project, do you plan to perform any environmental improvements in this community? If yes, describe. The project itself is an environmental improvement

Please provide the Department with an additional 1 to 2 page narrative description of the project, focusing on its function and its local/regional environmental, social, and economic benefits and impacts. Also, what sensitive receptors are present and how might they be affected by this project?

GENERAL

Is the project subject to:

Highlands Regional Master Plan – Planning or Preservation Area? No
http://www.nj.gov/dep/highlands/highlands_map.pdf

Pinelands Comprehensive Management Plan? No
<http://www.state.nj.us/pinelands/cmp/>

D&R Canal Commission Standards No
<http://www.dandrcanal.com/drcc/maps.html>

Delaware River Basin Commission No
(609) 883-9500
<http://www.state.nj.us/drbc/>

US Army Corp of Engineers review? No



State of New Jersey

Department of Environmental Protection
P.O. Box 420
Trenton, New Jersey 08625

PHILIP D. MURPHY
Governor

CATHERINE R. McCABE
Commissioner

SHEILA Y. OLIVER
Lt. Governor

July 25, 2019

Mr. Jesse Cutaia
Three Radnor Corporate Center
Suite 300
100 Matonford Road
Radnor, Pa 19087

RE: Cumberland Community Solar Project
532 Irving Ave, Block 79, Lot 36
Deerfield Twp., Cumberland County, NJ 08332

The Office of Permit Coordination and Environmental Review (PCER) distributed project information to various programs within the Department for the proposed Cumberland Community Solar project located on Irving Avenue in Deerfield Township, Cumberland County. Below are preliminary comments of possible permits and action items this project may require (but not limited to) based on the information that was submitted on June 20, 2019. While not a comprehensive nor a technical summary, we offer the following comments:

Land Use : Christopher Jones: Christopher.Jones@dep.nj.gov or Matthew.Resnick@dep.nj.gov

The Division of Land Use Regulation provides the following comments, based upon information provided in the readiness checklist.

A review of available GIS wetlands mapping shows a potential wetland adjacent to the northern and north eastern edge of the subject property line, with proposed construction impacting regulated areas. The DLUR recommends that applicant apply for a Letter of Interpretation: Verification under NJAC 7:7-4.5 to determine the extent of the wetlands and potential freshwater wetland permits needed. Any impacts to wetlands and/or transition areas will require approvals from the Division of Land use Regulation under the Freshwater Wetlands Protection Act.

The subject property has a regulated water course located in the forested area on the northern edge of the edge proposed development. The proposed development would qualify for an FHA permit by rule 30 under NJAC 7:13-7.30 Placement of Solar Panels and other associated equipment.

Fish and Wildlife: Kelly Davis: Kelly.Davis@dep.nj.gov or (908) 236-2118

The Division of Fish and Wildlife (DFW) has completed its review of the proposed Cumberland Solar LLC project in Galloway Township, Atlantic County and offer the following comments.

Based on the potential of ground nesting birds and habitats in the immediate vicinity of this project, the DFW would recommend any ground clearing or site preparation be done outside the nesting season (4/1 to 8/31) to avoid impact to ground nesting birds.

Should any unanticipated tree clearing become necessary a general timing restriction on trimming or removal of trees from 4/1 to 8/31 is recommended to protect nesting birds covered under the Non-game Species Conservation Act.

To avoid possible impacts to Little Brown and Tricolored Bats the DFW would recommend removal of highly suitable roost trees including snags (dead trees), shagbark hickories (*Carya ovata*), other trees with shaggy or exfoliating bark, and trees of any species over 5 inches DBH, be avoided between (4/1 to and 9/30).

Additionally, the contractor should instruct all employees and sub contractors to avoid any animals and, if possible, move any turtles to the closest suitable habitat outside the work zone and **release unharmed**.

County Soil Conservation District BMP's for prevention of sediment movement towards Lebanon Branch should be used at all times and maintained for function.

The DFW relies on the NJDEP Office of Natural Lands Management, Natural Heritage Program (NHP) for location and protective comment on floral threatened and endangered species. This review is specifically for faunal threatened and endangered species. The applicant will need to consult with the NHP for a complete listing of the threatened and endangered species within the project vicinity.

If you have any questions regarding the comments please feel free to contact me at (609) 984-3859 or at Joseph.Corleto@dep.nj.us.

State Historic Preservation Office: Jesse West-Rosenthal: Jesse.West-Rosenthal@dep.nj.gov or (609) 984-6019

Thank you for providing the Historic Preservation Office (HPO) with the opportunity for review and comment on the potential for the above-referenced project to affect historic and archaeological resources. The project borders a number of buildings over 50 years old within the viewshed of the project. *If subject to regulatory review, the HPO would request an architectural reconnaissance of the project's viewshed with recommendations for no additional work or intensive level survey for individual structures or any potential district.*

Portions of the project area are sensitive for historic and Pre-Contact period occupation. Specifically, a circa 1830s roadway may run through the middle of the project

area. In addition, well-drained upland areas within 300- to 500 feet of the Lebanon Branch and wetland complex holds a high archaeological sensitivity for Pre-Contact period archaeological deposits based on existing models for archaeological sensitivity in New Jersey. Finally, there is one known Pre-Contact archaeological site within close proximity of the project site. Therefore, *the project site has the potential to affect archaeological resources thus an initial Phase I archaeological identification-level survey would be appropriate if subject to formal regulatory review under Section 106 of the National Historic Preservation Act, E.O. 215, and/or DEP-FWW permitting.*

Thank you again for providing the opportunity to review and comment on the potential for the above-referenced project to affect historic and archaeological resources. Please reference HPO Project No. 19-2512 in any future communications to help expedite our review. If you have any questions, please contact Jennifer Leynes (609-984-6016) with any questions regarding historic architecture.

Bureau of Energy and Sustainability (Solar): Erin Hill: Erin.Hill@dep.nj.gov or (609) 633-1120

- The Community Solar Energy Pilot Program Application window opened April 9, 2019 and closes September 9, 2019
<https://www.bpu.state.nj.us/bpu/pdf/boardorders/2019/20190329/8E%20-%20Community%20Solar%20Energy%20Pilot%20Program%20Application%20Form.pdf>
- The proposed array is located on Urban Lands & Managed Wetland in Maintained Lawn Greenspace which are identified as "indeterminate" per the Solar Siting Analysis.
- Visit the BES solar siting webpage & NJ Community Solar Siting Tool
<https://www.state.nj.us/dep/ages/solar-siting.html>

Stormwater: Eleanor Krukowski (Eleanor.Krukowski@dep.nj.gov)

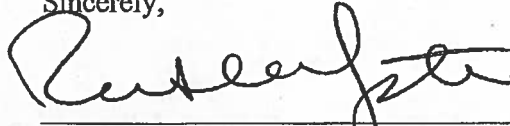
- Construction projects that disturb 1 acre or more of land, or less than 1 acre but are part of a larger common plan of development that is greater than 1 acre, are required to obtain coverage under the Stormwater construction general permit (5G3). Applicants must first obtain certification of their soil erosion and sediment control plan (251 plan) from their local soil conservation district office. Upon certification, the district office will provide the applicant with two codes process (SCD certification code and 251 identification code) for use in the DEPonline portal system application. Applicants must then become a registered user for the DEPonline system and complete the application for the Stormwater Construction General Authorization. Upon completion of the application the applicant will receive a temporary authorization which can be used to start construction immediately, if necessary. Within 3-5 business days the permittee contact identified in the application will receive an email including the application summary and final authorization.

Should circumstances or conditions be or become other than as set forth in the information that was recently provided to the NJDEP, the comments and regulatory requirements provided above are subject to change and may no longer hold true. Statements made within this email are not indicative that the NJDEP has made any decisions on whether the proposed project will be permitted.

Please review the comments that were provided. If you would like to work with the programs directly, we just ask that you keep Permit Coordination copied on any correspondence so we may update our records. This email shall serve to satisfy the Community Solar application requirement that the Applicant has met with PCER.

If you have any additional questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ruth W. Foster', written over a horizontal line.

Ruth W. Foster, PhD., P.G., Director

4.5: *EDC Hosting Capacity*
(Section B, VIII, 4)

- A. Hosting Capacity Map Screenshot
- B. Hosting Capacity Map Disclaimer Page(s)

Distribution Feeder Hosting Capacity PHI

Pepco Holdings GIS Team

Place



Pepco_Sec	RadialHostingCapacityPHI - Pepco	RadialHostingCapacityPHI - DPL_Sec	RadialHostingCapacityPHI - DPL	RadialHostingCapacityPHI - ACE_Sec	RadialHostir			
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OrderID	Allowable_PV_kW	Max_Size_Restriction	OpVolt	Total_Active_Gen_k	Total_Pending_Gen	Total_Gen_kW	NAME	Feec
1463	0.00	Maximum System Size of 0kW	12-13kV	4,995.84	7,120.58	12,116.42	ACE	0.00
1463	0.00	Maximum System Size of 0kW	12-13kV	4,995.84	7,120.58	12,116.42	ACE	0.00

Hosting Capacity Map

We support renewable energy and partner with our customers to ensure safe and reliable interconnection of renewable energy and other distributed energy resources into the electric grid.

The Hosting Capacity map gives an indication of how much generation (expressed in kW) can be added to a feeder before the feeder reaches capacity or other limitations that reduce the reliability of service to electric customers on the feeder. **Although the values are meant to provide the user with a general idea of availability, space on the desired feeder is not guaranteed and/or may change at any time. All applications for interconnection will still require a full review and may also require additional interconnection costs.**

Hosting capacity is not an exact science. Results shown may understate the hosting capacity and results will be revisited in the future. For more details, please consult the "[Criteria Summary](#)."

Due to the amount of data, the map may take a minute to load. Thank you for your patience.

Radial Distribution Feeders

Please note that the aggregate limit of large distributed energy resources is 3 MW on 12/13 kV, 6 MW on 25 kV, and 10 MW on 34 kV. Any system over 250 kW is considered to be "large." After the aggregate large limit is reached, 250 kW or smaller systems can continue to be added until another circuit or substation violation would be reached.

[Click here](#) to access a searchable version of the Hosting Capacity map for radial distribution feeders. Type an address into the search box to locate a specific location.

Network Distribution Feeders

Please note NJ state rules and levels may be different (see "Criteria Summary"). Customers applying for a Level 1 application cannot be sized above 10 kW and must be inverter based.

Spot network customers who want to apply for a Level 2 application must only be serving one customer, and the system must be limited to less than five percent of the spot network peak load or 50 kW, whichever is less.

Customers on an area grid network applying for a Level 3 system cannot be greater than 50 kW, with no single-phase system larger than 20 kW, and the aggregate maximum injection is five percent of the peak load or 50 kW; whichever is less.

Applications (Level 4) for systems larger than Level 2 or 3, on either a spot network or an area grid network will be reviewed by our engineering team. A photovoltaic system should not cause inadvertent network protector operations and may require additional monitoring or controls, such as reverse power relays to insure proper network protector operations.

[Click here to access a searchable version of the Hosting Capacity map for underground network distribution feeders.](#) Type an address into the search box to locate a specific location.

Current Circuit Map Disclaimer

- The technological, legal, and regulatory considerations that apply to interconnection of solar generation and other distributed energy resources are complex and constantly evolving. To the best of Pepco Holdings' knowledge, the information presented on this map was accurate in all material respects as of September 2018. However, Pepco Holdings, Atlantic City Electric, Delmarva Power, Pepco, and their affiliates cannot guaranty the accuracy of the information found on this map. Please seek appropriate technical, operational, financial, and legal advice before proceeding. NOTE: The hosting capacity of the secondary network was published June 2017 and has not and is not currently able to be updated.



Hosting Capacity computed with EDD software.

© Atlantic City Electric Company, 2019.

**4.6: *Community Engagement and
Environmental Justice Letters of Support
(Section B, IX, 5)***

- A. Affordable Housing Provider Letters of Support
- B. Community Organization Letters of Support
- C. Environmental Justice Organization Letters of Support
- D. Additional Letters of Support

August 30, 2019

CONFIDENTIAL

Letter In Support of Community Energy Inc.'s New Jersey Community Solar Projects

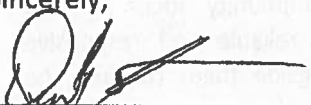
To Whom It May Concern:

The [redacted] has been dedicated in the fight against homelessness and poverty in New Jersey since its inception in 1991. The [redacted] began its focus primarily on the residents and needs of Monmouth county but has since expanded its services to helping communities across the state; while simultaneously growing our hardworking team to over 80 employees. In addition to the development of over 550 affordable housing units, the [redacted] also extends its expertise to creating and maintaining programs such as educational workshops and one-on-one counseling. The [redacted] continues to stay dedicated to providing affordable housing for those in the state of New Jersey.

Community Energy and [redacted] preliminary discussions regarding the community solar program, which may lead to [redacted] participation in the program, especially as it relates to low and moderate income families. Community Energy has discussed opportunities for [redacted] via our deed restricted affordable housing buildings, to subscribe to the project and receive electric benefits that can be passed through to tenants. We believe these benefits will be another great opportunity for us to better serve and provide for our tenants in our affordable housing units. Therefore, we appreciate Community Energy reaching out to us as a prospective partner.

We encourage the approval of their projects and look forward to the benefits they will bring to region.

Sincerely,


[redacted]
[redacted]

CONFIDENTIAL

August 23, 2019

Letter in Support of Community Energy Inc.'s New Jersey Affordable Housing and LMI Inclusive Community Solar Projects

To Whom It May Concern:

Since its inception in 1993, [redacted] has developed into the only full-service affordable housing implementation company in the state of New Jersey and widely respected within the region. [redacted] leads with a strong management team that includes professional planners, grant-writers, COAH certified housing specialists, licensed building inspectors, lead testers, and informative support staff. [redacted] is experienced in every aspect of community development. [redacted] serves as the Administrative Agent for more than 2,000 affordable homes and supervised the renovation of more than 2,500. The grant writing team of [redacted] secures over \$15 million annually for their clients. [redacted] has assisted municipalities and counties throughout southern, central and northern New Jersey as well as various locations in [redacted]. To date, [redacted] has realized more than \$250 million for their clients and is a key community resource in the affordable housing space. As Vice President of [redacted] we publicly support affordable housing and Low and Moderate Income ("LMI") inclusive community solar projects in the state of New Jersey through the State's new Community Solar Energy Pilot Program. Community Energy Inc. is at the forefront of developing these projects, and we are in support of their efforts. [redacted] has taken an active role in facilitating a conversation and providing useful information to us and to several of our affordable housing partners. Community Energy has discussed opportunities for our affordable housing partners' and their tenants to participate. We believe these benefits could be another great opportunity for the affordable housing community to better serve and provide for their tenants.

Community Energy's 20-year history of development expertise and community focus is very commendable. Community Energy's leadership demonstrates them as a reliable and responsive community partner and we look forward to the potential to work alongside them through the development of these solar projects in our region.

We encourage the approval of these affordable housing and LMI-inclusive projects and look forward to the benefits these projects and others will bring to region.

Sincerely,



[redacted]

CONFIDENTIAL

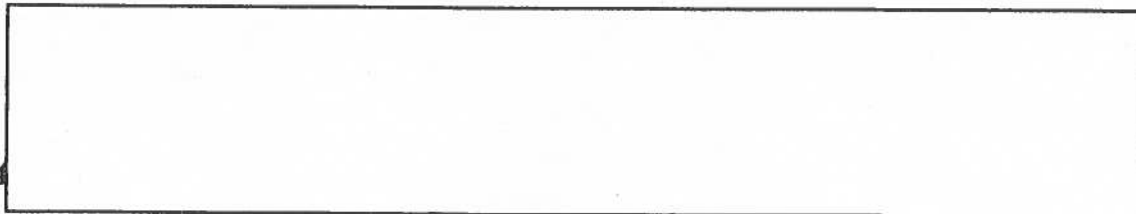
August 20, 2019

Re: Letter In Support of Community Energy Inc.'s
New Jersey Community Solar Projects

To Whom It May Concern:

Since its incorporation in 1977, [] Inc. has developed into a widely respected provider of community support services in the state of New Jersey. [] was established to assist the elderly and those in need. Through various programs and services ranging from its Residential housing and supports for seniors and developmentally disabled individuals to its Assisted Living Programs, [] has afforded the opportunity of adults with developmental disabilities and seniors the opportunity to remain independent in their community or with their families longer than would otherwise be possible. [] has been able to expand with the growing needs of the community by offering 52 community-based residences throughout New Jersey for adults with developmental disabilities, 46 affordable senior housing units on its [] and two social day centers located in [] for social engagement of the disabled and elderly. [] continues its dedication to serve the needs of adults with disabilities and the elderly.

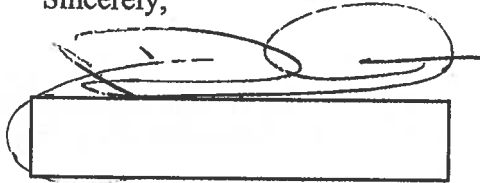
The [] organization publicly supports LMI-inclusive community solar projects in the state of New Jersey through the State's new Community Solar Energy Pilot Program. I understand that Community Energy Inc. is at the forefront of developing these projects of which we are in support. Community Energy has taken an active role in facilitating conversations, providing useful information and encouraging [] to participate in the development of their community solar program plans in our greater community, especially as they relate to including low and moderate income participants. Community Energy has discussed opportunities for [] via our affordable housing buildings and group homes, to subscribe to the project and receive electric benefits that will be passed through to our tenants. We believe these benefits will be another great opportunity for us to better serve and provide for our residents in our affordable housing units and group homes.



Community Energy's 20-year history of development expertise and community focus is very commendable. We understand that Community Energy has been a reliable and responsive community partner and we look forward to the potential to work with them through the development of these solar projects in our region.

We encourage the approval of these LMI-inclusive projects and look forward to the benefits these projects and others will bring to region.

Sincerely,

A handwritten signature in black ink is written over a rectangular box. The signature is stylized with a large loop and a horizontal line. The box is empty and appears to be a placeholder for a name or title.

CONFIDENTIAL

Chief Executive Officer

August 30, 2019

Community Energy Solar
Three Radnor Corporate Center - Suite 300
100 Matsonford Road
Radnor, Pa 19087

To Whom It May Concern:

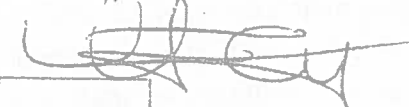
Since its inception in 1984, [redacted] has developed into a widely respected provider of community support services in the state of New Jersey. [redacted] began in response to the needs of people within the community who have the lived experiences of mental health conditions in conjunction with low income status. Through these various educational forums, advocacy, and statewide services [redacted] able to transcend beyond the "patient role" and establish a support model surrounding ho [redacted] opened its first peer-run house in [redacted] and has since expanded into an affordable housing provider for more than 750 New Jersey residents. [redacted] continues to stay dedicated to providing housing and services as well as promoting the wellness and recovery within the community.

As the Chief Executive Officer of [redacted] we publicly support LMI-inclusive community solar projects in the state of New Jersey through the State's new Community Solar Energy Pilot Program. Community Energy Inc. is at the forefront of developing these projects, and we support their efforts. Community Energy has taken an active role in facilitating conversations, providing useful information and encouraging us to participate in the development of their community solar program plans in our greater community, especially as it relates to including low and moderate income participants. Community Energy has discussed opportunities for [redacted] to subscribe to the project and receive electric benefits that will be passed through to our tenants. We believe these benefits will be another great opportunity for us to better serve and provide for our tenants in our affordable housing units.

Community Energy's 20-year history of development expertise and community focus is very commendable. Community Energy has been a reliable and responsive community partner and we look forward to the potential to work with them through the development of these solar projects in our region.

We encourage the approval of these LMI-inclusive projects and look forward to the benefits these projects and others will bring to the region.

Sincerely,



Chief Executive Officer

CONFIDENTIAL

September 3, 2019

Letter In Support of Community Energy Inc.'s New Jersey Community Solar Projects

To Whom It May Concern:

The [redacted] has been working on air and clean energy issues in New Jersey since its inception in 1967. [redacted] is committed to addressing the threat of climate change by promoting the use of renewable energy and energy efficiency in New Jersey.

[redacted] was launched in [redacted] in New Jersey, Pennsylvania and Delaware. For over 50 years, [redacted] has been involved in many initiatives to clean up the air in the region and address pollution from fossil fuels. In the early years, [redacted] was mostly involved in ensuring that New Jersey complied with its Clean Air Act requirements and that residents of New Jersey were educated on public participation opportunities. Later as alternatives to fossil fuels became more available and cost-effective [redacted] promoted wind energy in New Jersey by signing up its members and others in New Jersey to purchase wind energy credits. Today [redacted] is working to promote alternatives to coal and natural gas in Pennsylvania and New Jersey. [redacted] works with community members in New Jersey to better protect water bodies from natural gas infrastructure. [redacted] is active in ensuring that if natural gas infrastructure is developed in New Jersey it is done in a way that protects public safety and health and protects local eco-systems.

As [redacted] I strongly support Community Energy Inc.'s proposed community solar projects in New Jersey. Community Energy has taken an active role in facilitating conversations, providing useful information and encouraging us to participate in the development of their community solar program plans in our greater community, especially as it relates to maximizing the New Jersey Community Energy Solar Programs goals of community and environmental justice engagement. Community Energy has discussed opportunities for how our organization members can subscribe to the project and receive the environmental and electric benefits. We believe these benefits will be another great opportunity for us to better serve and provide opportunities for our New Jersey members to maximize their sustainability efforts. Therefore, we appreciate Community Energy reaching out to us as a prospective partner.

Community Energy's 20-year history of development expertise and community focus made them stand out during our discussions. Community Energy has been a reliable and responsive partner and we look forward to working with them through the development of these community solar projects.

We encourage the approval of their projects and look forward to the benefits they will bring to the region.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith", written over a rectangular box.

CONFIDENTIAL

Letter In Support of Community Energy Inc.'s New Jersey Affordable Housing and LMI Inclusive Community Solar Projects

The [] is a network of business organizations and companies committed to advancing market solutions and policies to support a vibrant, just and sustainable New Jersey economy. [] brings together the State's values-based business leaders to form a power base that educates businesses, legislators and the media; is a catalyst for sound new policies; and advances systemic market change to actively foster a viable, sustainable economy at all levels. [] is a state affiliate of the []

[] work includes supporting the Governor's executive order for developing the Energy Master Plan to reach 100% renewables by 2050 by testifying in front of the Board of Public Utilities and participating in a Rise for Climate, Jobs, and Justice Rally Festival.

As Executive Director of [] we publicly support affordable housing and Low and Moderate Income ("LMI") inclusive community solar projects in the state of New Jersey through the State's new Community Solar Energy Pilot Program. These projects reflect a triple bottom line approach and strengthen policy to create a viable market for solar energy access for all. Community Energy Inc. is at the forefront of developing these projects, and we are in support of their efforts. Community Energy has taken an active role in facilitating a conversation to assure that [] is aware and involved in the community solar work during the Pilot phase in the State of New Jersey. We believe these projects and their triple bottom line benefits are important models for strong and innovative economic development through energy infrastructure.

Community Energy's 20-year history of development expertise and community focus is very commendable. Community Energy's leadership demonstrates them as a reliable and responsive community partner and we look forward to offering support through the development of these solar projects in our State.

We encourage the approval of these affordable housing and LMI-inclusive projects and look forward to the benefits these projects and others will bring to region.

Sincerely,

[]

CONFIDENTIAL

State of New Jersey Board of Public Utilities
44 South Clinton Avenue, 7th Floor
PO Box 350
Trenton, NJ 08625-0350
Attn: Office of Clean Energy

Dear New Jersey Board of Public Utilities Commissioners and Staff:

[REDACTED] is excited to support Community Energy's proposal to develop pollinator-friendly projects in New Jersey. [REDACTED] works closely and collaboratively with the National Renewable Energy Laboratory (NREL), a premier national lab funded by the United States Department of Energy, to accelerate adoption of low-impact solar development practices that meaningfully benefit agriculture and ecosystems.

[REDACTED] is a nationally recognized expert source on the topic pollinator-friendly solar development. Community Energy's 20-year history of development expertise and community focus made them stand out during our discussions. Community Energy has been a reliable and responsive partner and we look forward to working with them through the development of these projects.

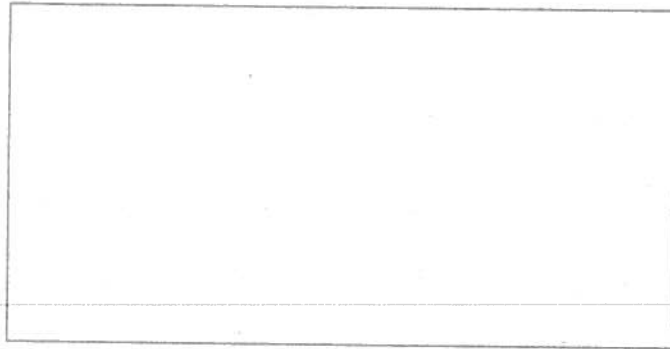
[REDACTED] understands that community solar is designed to benefit a wide array of community stakeholders and project subscribers, including low- and moderate-income subscribers. Community Energy has taken an active role in facilitating conversations, providing useful information and encouraging us to participate in the development of their community solar program plans. As part of our support for this proposal, [REDACTED] and NREL will work with Community Energy and its landscaping partner to ensure best practices are used in the design and implementation of pollinator-friendly groundcover that benefits the soil, surrounding crops and ecosystems, and wildlife.

We urge the Board to select this proposal to move forward.

Sincerely,

[REDACTED]

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The is a national partnership of federal and state agencies, non-governmental organizations, businesses and academic programs working together to conserve monarch butterflies and their habitats.

Community Energy's proposal to provide abundant and healthy sources of nectar and pollen on its community solar projects in New Jersey is encouraging news that has the potential to meaningfully benefit many important pollinators.



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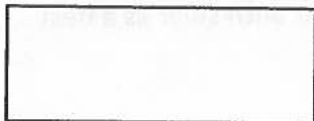
State of New Jersey Board of Public Utilities
44 South Clinton Avenue, 7th Floor
PO Box 350
Trenton, NJ 08625-0350
Attn: Office of Clean Energy

Dear New Jersey Board of Public Utilities Commissioners and Staff:

Established in 1997, the [REDACTED] is the largest 501(c) 3 non-profit organization dedicated exclusively to the health, protection, and conservation of all pollinating animals. [REDACTED] actions for pollinators include education, conservation, restoration, policy, and research.

Protection and conservation of pollinators doesn't require much—just acres and acres of flowering plants and clean food and water sources. [REDACTED] **applauds Community Energy for its proposal to use to provide acres of flowering meadows under and around the ground-mounted solar projects.**

The environment and the economy both win when states like New Jersey choose ecologically and agriculturally innovative solar developers like Community Energy to provide both low-cost energy and high-quality habitat for pollinators. That's a victory for all of us.



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Protecting the Life that Sustains Us

State of New Jersey Board of Public Utilities
44 South Clinton Avenue, 7th Floor
PO Box 350
Trenton, NJ 08625-0350
Attn: Office of Clean Energy

Dear New Jersey Board of Public Utilities Commissioners and Staff:

The [REDACTED] is an international nonprofit organization that protects the natural world through the conservation of invertebrates and their habitats. We take our name from the now extinct [REDACTED] Blue butterfly (*Glaucopsyche* [REDACTED]), the first butterfly known to go extinct in North America as a result of human activities.

The [REDACTED] is a science-based conservation organization, working with diverse partners including scientists, land managers, educators, policymakers, farmers, and citizens. By using applied research, engaging in advocacy, providing educational resources, and addressing policy implications, we endeavor to make meaningful long-term conservation a reality.

Our core programs focus on habitat conservation and restoration, species conservation, protecting pollinators, contributing to watershed health, and reducing harm to invertebrates from pesticide use.

Pollinators are in decline, and wildflower plantings on solar farms can help provide the nutrition and habitat that bees and butterflies need, if established with a wide diversity of native plants. **Community Energy's decision to include pollinator habitat that exceeds the scorecard standards established in several states is a smart move that will help promote further adoption of co-location of pollinator habitat with solar as a best practice.**

Sincerely,



[REDACTED]

[REDACTED]

August 27th, 2019

CONFIDENTIAL

Letter In Support of Community Energy Inc.'s New Jersey Community Solar Projects

To Whom It May Concern:

We, [REDACTED] have been working on land enhancement and pollinator habitat construction and restoration in the Northeast and Mid-Atlantic US for 20 years. In particular, we have worked with many solar developers on solar specific land enhancement designs to maximize positive impact of solar developments with regards to pollinators, soil conservation, stormwater and landscape management.

The reestablishment of native pollinator habitat on solar arrays will support the return of native insects and butterflies, and bees. The presence of pollinators will contribute to areas within a three mile radius of the array including agricultural land, gardens, and the natural wild landscapes.

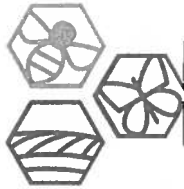
As [REDACTED] we publicly support Community Energy Inc.'s proposed community solar projects in New Jersey. Community Energy has taken an active role in facilitating conversations, engaging on the issues, and leveraging our expertise when it comes to land enhancements practices. In particular, Community Energy has taken an active role to commit to establishing exceptional pollinator friendly habitat in and around their solar projects, as measured by the Pollinator Friendly Solar Scorecard. We believe the benefits of advanced pollinator friendly habitats and proper maintenance on projects in the NJ Community Solar Program will be a boon to local agricultural producers and all New Jersey citizens. To that end, we greatly appreciate Community Energy reaching out to us as a prospective partner.

Community Energy's 20-year history of development expertise and community focus made them stand out during our discussions and we look forward to working with them through the development of these community solar projects.

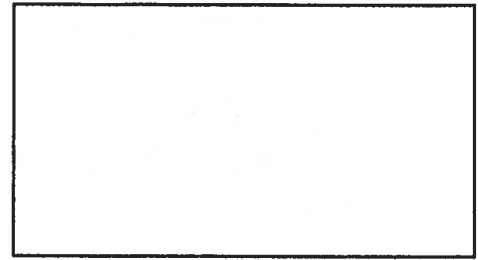
We encourage the approval of their projects and look forward to the benefits they will bring to the region.

Sincerely,

[REDACTED]



CONFIDENTIAL



State of New Jersey Board of Public Utilities
44 South Clinton Avenue, 7th Floor
PO Box 350
Trenton, NJ 08625-0350
Attn: Office of Clean Energy

Dear New Jersey Board of Public Utilities Commissioners and Staff:

I am writing to share [redacted] position of enthusiastic support for Community Energy's proposal to develop solar projects in New Jersey.

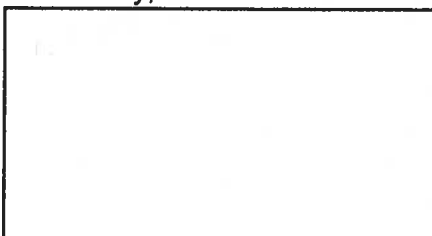
Critical habitat is disappearing in the United States. As a result, honey bees and other pollinators like monarch butterflies are in serious decline. These pollinators are essential to life as we know it. In fact, about one-third of global food production and billions in agriculture are dependent on pollinators to some degree – honey bees and other insects pollinate 80 percent of flowering plants worldwide.

The [redacted] is establishing high quality pollinator habitat to ensure honey bee and monarch butterfly populations thrive. We're working with landowners, conservationists, scientists, beekeepers, and innovative solar developers to build healthy and sustainable pollinator habitat with maximum benefits.

Community Energy's commitment to use an entomologist vetted pollinator-friendly solar scorecard is just one example of the company's commitment for its projects to provide meaningful pollinator value. [redacted] will advise Community Energy and its partners on effective seed mix design, site preparation, and management plans and practices to help ensure success.

[redacted] encourages the State of New Jersey Board of Public Utilities to select Community Energy's proposal to develop pollinator-friendly solar projects both for the immediate value they will provide to pollinators and for the example they will set for the rest of the state and the region that pollinator-friendly development is a best practice.

Sincerely,





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All information in this document is strictly confidential

In addition to the letters of support provided in the project application package, Community Energy has been working to engage another ☐ affordable housing, community, and environmental justice groups across the State over the past several months. This list of organizations is below. We are committed to finding strong partners to work with on this LMI projects and look forward to pursuing additional conversations with many of these organizations as this process moves forward.

--

**4.7: *Project Cost Spreadsheet
Model
(Section B, XI, 1)***



**COMMUNITY
ENERGY SOLAR**

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All information in this document is strictly confidential

NJ Community Solar Pilot Program Project Cost Worksheet

Project Name:

Cumberland Solar LLC

Yellow highlighted = Metrics Requested on Community Solar Application Section B, XI, 1

Project Metrics		Install Costs:		Net Installed Cost	
Project Size (kWdc)		Interconnection:		Net Installed Cost	
Project Size (kWac)		EPC + Development:		Net Installed Cost per watt	
Gross Irradiation		Marketing/CAC:			
Annual Production (kWh)		Total :			
Rate Assumptions		Operating Costs:		NPV - Lifetime Operating Costs Plus Tax Benefits Net Present kWh	
Cost of Capital/Discount Rate		Subscriber Mgmt		Levelized Cost of Energy (LCOE)	
Annual Operating Cost Growth		O&M			
Annual Production Loss		Other (Taxes, Insurance, land, etc)			
Annual Customer Churn		Total Annual:			
Federal ITC		Average Annual:			
Tax Rate					

MACRS 5-Year Depreciation Schedule	
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4.8: *Pollinator-Friendly Solar Scorecard*

Project Name: Cumberland Solar LLC



Pollinator-friendly solar scorecard

The entomologist-approved standard for what constitutes "beneficial to pollinators" within the managed landscape of a PV solar facility. Only for use in countries and/or states that have not yet adopted a standard.

1. PERCENT OF PROPOSED SITE VEGETATION COVER TO BE DOMINATED BY WILDFLOWERS

- ☐ 31-45 % +5 points
☒ 46-60 % +10 points
☐ 61+ % +15 points

Total points

Note: Projects may have "array" mixes and diverse open area/ border mixes; forb dominance should be averaged across the entire site. The dominance should be calculated from total numbers of forb seeds vs. grass seeds (from all seed mixes) to be planted.

2. PLANNED % OF SITE DOMINATED BY NATIVE SPECIES COVER

- ☐ 26-50% +5 points
☐ 51-75% +10 points
☒ 76-100% +15 points

Total points

3. PLANNED COVER DIVERSITY (# of species in seed mixes; numbers from upland and wetland mixes can be combined)

- ☒ 10-19 species +5 points
☐ 20-25 species +10 points
☐ 26 or more species +15 points

Total points

Note: exclude invasives from species totals.

4. PLANNED SEASONS WITH AT LEAST 3 BLOOMING SPECIES PRESENT (check/add all that apply)

- ☒ Spring (April-May) +5 points
☒ Summer (June-August) +5 points
☒ Fall (September-October) +5 points

Total points

Note: Check local resources for data on bloom seasons

5. AVAILABLE HABITAT COMPONENTS WITHIN .25 MILES (check/add all that apply)

- ☒ Native bunch grasses for nesting +2 points
☒ Native trees/shrubs for nesting +2 points
☒ Clean, perennial water sources +2 points
☒ Created nesting feature/s (bee blocks, etc.) +2 points

Total points

6. SITE PLANNING AND MANAGEMENT

- ☒ Detailed establishment and management plan developed with funding/contract to implement +15 points
☒ Signage legible at 40 or more feet stating "pollinator friendly solar habitat" (at least 1 every 20ac.) +5 points

Total points

7. SEED MIXES

- ☒ Mixes are composed of at least 40 seeds per square foot +5 points
☒ All seed genetic origin within 175 miles of site +5 points
☒ At least 2% milkweed cover to be established from seed/plants +10 points

Total points

8. INSECTICIDE RISK

- ☐ Planned on-site insecticide use or pre-planting seed/plant treatment (excluding buildings/ electrical boxes, etc.) -40 points
☐ Bare ground under the panels as a result of pre and post emergent herbicide. -40 points
☐ Communication/registration with local chemical applicators about need to prevent drift from adjacent areas. +10 points

Total points

9. OUTREACH/EDUCATION

- ☐ Site is part of a study with a college, university, or research lab. +5 points

Grand total

Provides Exceptional Habitat
Meets Pollinator Standards

>85
70-84

Project Name:
Vegetation Consultant:
Project Location:
Total acres (array and open area):
Projected Seeding Date:

Note: Percent "cover" should be based on "absolute cover" (the percent of the ground surface that is covered by a vertical projection of foliage as viewed from above). To measure cover diversity use plots, and/or transects in addition to meander searches. Wildflowers in question 1 refer to "forbs" (flowering plants that are not woody or graminoids) and can include introduced clovers and other non-native, non-invasive species beneficial to pollinators.



Fresh Energy

5: *Community Solar Application – Certifications (Section C)*

- 5.1 Applicant Certification**
- 5.2 Project Developer Certification**
- 5.3 Project Owner Certification**
- 5.4 Property Owner Certification**
- 5.5 Subscriber Organization Certification**



Section C: Certifications

Instructions: Original signatures on all certifications are required. All certifications in this section must be notarized.

Applicant Certification

The undersigned warrants, certifies, and represents that:

- 1) I, Brent Beerley (name) am the Manager (title) of the Applicant Cumberland Solar LLC (name) and have been authorized to file this Applicant Certification on behalf of my organization; and
- 2) The information provided in this Application package has been personally examined, is true, accurate, complete, and correct to the best of the undersigned's knowledge, based on personal knowledge or on inquiry of individuals with such knowledge; and
- 3) The community solar facility proposed in the Application will be constructed, installed, and operated as described in the Application and in accordance with all Board rules and applicable laws; and
- 4) The system proposed in the Application will be constructed, installed, and operated in accordance with all Board policies and procedures for the SREC Registration Program or subsequent revision to the SREC Registration Program, if applicable; and
- 5) My organization understands that certain information in this Application is subject to disclosure under the Open Public Records Act, N.J.S.A. 47-1A-1 et seq., and that sensitive and trade secret information that they wish to keep confidential should be submitted in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.; and
- 6) My organization acknowledges that submission of false information may be grounds for denial of this Application, and if any of the foregoing statements are willfully false, they are subject to punishment to the full extent of the law, including the possibility of fine and imprisonment.

Signature: [Signature]

Date: 8/1/19

Print Name: Brent Beerley

Title: Manager

Company: Cumberland Solar LLC

Signed and sworn to before me on this 1st day of August, 2019

Signature

Linda S. Curello

Name

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
LINDA S CURELLO

Notary Public

RADNOR TOWNSHIP, DELAWARE COUNTY
My Commission Expires May 31, 2020



Project Developer Certification

This Certification "Project Developer / Installer" is optional if: 1) the Applicant is a government entity (municipal, county, or state), AND 2) the community solar developer will be selected by the Applicant via a Request for Proposals (RFP), Request for Quotations (RFQ), or other bidding process. In all other cases, this Certification is required.

The undersigned warrants, certifies, and represents that:

- 1) I, Brent Beerley (name) am the Manager (title) of the Project Developer Cumberland Solar LLC (name) and have been authorized to file this Applicant Certification on behalf of my organization; and
- 2) The information provided in this Application package has been personally examined, is true, accurate, complete, and correct to the best of the undersigned's knowledge, based on personal knowledge or on inquiry of individuals with such knowledge; and
- 3) The community solar facility proposed in the Application will be constructed, installed, and operated as described in the Application and in accordance with all Board rules and applicable laws; and
- 4) The system proposed in the Application will be constructed, installed, and operated in accordance with all Board policies and procedures for the SREC Registration Program or subsequent revision to the SREC Registration Program, if applicable; and
- 5) My organization understands that certain information in this Application is subject to disclosure under the Open Public Records Act, N.J.S.A. 47-1A-1 et seq., and that sensitive and trade secret information that they wish to keep confidential should be submitted in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.; and
- 6) My organization acknowledges that submission of false information may be grounds for denial of this Application, and if any of the foregoing statements are willfully false, they are subject to punishment to the full extent of the law, including the possibility of fine and imprisonment.

Signature: [Signature]

Date: 8/1/19

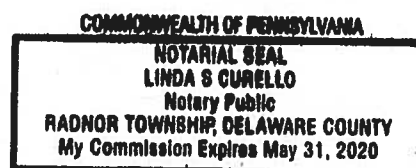
Print Name: Brent Beerley

Title: Manager

Company: Cumberland Solar LLC

Signed and sworn to before me on this 1st day of August, 2019

Signature: [Signature]
Name: Linda S. Currello





Project Owner Certification

The undersigned warrants, certifies, and represents that:

- 1) I, Brent Beerley (name) am the Manager (title) of the Project Owner Cumberland Solar LLC (name) and have been authorized to file this Applicant Certification on behalf of my organization; and
- 2) The information provided in this Application package has been personally examined, is true, accurate, complete, and correct to the best of the undersigned's knowledge, based on personal knowledge or on inquiry of individuals with such knowledge; and
- 3) The community solar facility proposed in the Application will be constructed, installed, and operated as described in the Application and in accordance with all Board rules and applicable laws; and
- 4) The system proposed in the Application will be constructed, installed, and operated in accordance with all Board policies and procedures for the SREC Registration Program or subsequent revision to the SREC Registration Program, if applicable; and
- 5) My organization understands that certain information in this Application is subject to disclosure under the Open Public Records Act, N.J.S.A. 47-1A-1 et seq., and that sensitive and trade secret information that they wish to keep confidential should be submitted in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.; and
- 6) My organization acknowledges that submission of false information may be grounds for denial of this Application, and if any of the foregoing statements are willfully false, they are subject to punishment to the full extent of the law, including the possibility of fine and imprisonment.

Signature: _____

Date: 8/1/19

Print Name: Brent Beerley

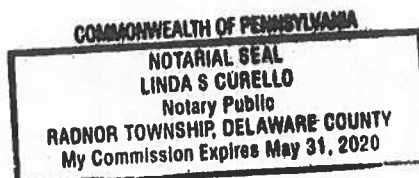
Title: Manager

Company: Cumberland Solar LLC

Signed and sworn to before me on this 1st day of August, 2019

Signature _____

Name Linda S. Curello





Property Owner Certification

The undersigned warrants, certifies, and represents that:

- 1) I, Frank Paladino (name) am the Property Owner (title) of the Property Parcel 0603_79_36_QFarm (name) and have been authorized to file this Applicant Certification on behalf of my organization; and
- 2) The information provided in this Application package pertaining to siting and location of the proposed community solar project has been personally examined, is true, accurate, complete, and correct to the best of the undersigned's knowledge, based on personal knowledge or on inquiry of individuals with such knowledge; and
- 3) My organization or I understand that certain information in this Application is subject to disclosure under the Open Public Records Act, N.J.S.A. 47-1A-1 et seq., and that sensitive and trade secret information that they wish to keep confidential should be submitted in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.; and
- 4) My organization acknowledges that submission of false information may be grounds for denial of this Application, and if any of the foregoing statements are willfully false, they are subject to punishment to the full extent of the law, including the possibility of fine and imprisonment.

Signature: Frank Paladino

Date: 9-6-19

Print Name: Frank Paladino

Title: Property Owner

Company: _____

Signed and sworn to before me on this 6th day of Sept, 2019

[Signature]
Signature

Xiomara Ramos
Name

XIOMARA RAMOS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 07/07/2020



Subscriber Organization Certification (optional, complete if known)

The undersigned warrants, certifies, and represents that:

- 1) I, Brent Beerley (name) am the President (title) of the Subscriber Organization COMMUNITY ENERGY SOLAR, LLC (name) and have been authorized to file this Applicant Certification on behalf of my organization; and
- 2) The information provided in this Application package has been personally examined, is true, accurate, complete, and correct to the best of the undersigned's knowledge, based on personal knowledge or on inquiry of individuals with such knowledge; and
- 3) The community solar facility proposed in the Application will be constructed, installed, and operated as described in the Application and in accordance with all Board rules and applicable laws; and
- 4) My organization understands that certain information in this Application is subject to disclosure under the Open Public Records Act, N.J.S.A. 47-1A-1 et seq., and that sensitive and trade secret information that they wish to keep confidential should be submitted in accordance with the confidentiality procedures set forth in N.J.A.C. 14:1-12.3.; and
- 5) My organization acknowledges that submission of false information may be grounds for denial of this Application, and if any of the foregoing statements are willfully false, they are subject to punishment to the full extent of the law, including the possibility of fine and imprisonment.

Signature: _____

Date: _____

Print Name: _____

Brent Beerley

Title: President

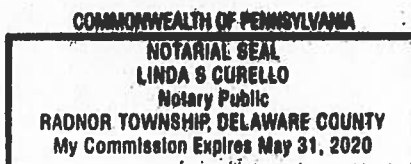
Company: COMMUNITY ENERGY SOLAR, LLC

Signed and sworn to before me on this 1st day of August, 2019

Signature _____

Name _____

Linda S. Curello



6: Community Solar Application – Appendix (Section D)

6.1 Product Offering Questionnaire – Appendix A

6.2 Required Attachments Checklist – Appendix B



Section D: Appendix

Appendix A: Product Offering Questionnaire

Complete the following Product Offering Questionnaire. If there are multiple different product offerings for the proposed community solar project, please complete and attach one Product Offering Questionnaire per product offering.

Applicants are expected to provide a good faith description of the product offerings developed for the proposed community solar project, as they are known at the time the Application is filed with the Board. If the proposed project is approved by the Board, the Applicant must notify the Board and receive approval from the Board for any modification or addition to a Product Offering Questionnaire.

Exception: This "Product Offering Questionnaire" is optional if: 1) the Applicant is a government entity (municipal, county, or state), AND 2) the community solar developer will be selected by the Applicant via a Request for Proposals (RFP), Request for Quotations (RFQ), or other bidding process.

This Questionnaire is Product Offering number 1 of 1 (total number of product offerings).

1. Community Solar Subscription Type (examples: kilowatt hours per year, kilowatt size, percentage of community solar facility's nameplate capacity, percentage of subscriber's historical usage, percentage of subscriber's actual usage):



2. Community Solar Subscription Price: (check all that apply)



3. Contract term (length):

4. Fees

5. Does the subscription guarantee or offer fixed savings or specific, quantifiable economic benefits to the subscriber? ☒ Yes ☐ No

If "Yes," the savings are guaranteed or fixed:



As a percentage of monthly utility bill

As a fixed guaranteed savings compared to average historic bill

As a fixed percentage of bill credits

Other: _____

6. Special conditions or considerations:



7. Community Solar Fixed Discount Offer Details:





Appendix B: Required Attachments Checklist

Note that this list is for indicative purposes only. Additional attachments may be required, and are identified throughout this Application Form.

Required Attachments for all Applications	Page	Attached?
Delineated map of the portion of the property on which the community solar facility will be located.	p.7	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
For electronic submission only: copy of the delineated map of the portion of the property on which the community solar facility will be located as a PDF and in drawing file format (.dwg) or as a shapefile (.shp).	p.7	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Proof of site control.	p.8	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Copy of the completed Permit Readiness Checklist as it was submitted to NJDEP PCER, if applicable.	p.11	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Proof of a meeting with NJDEP PCER, if applicable.	p.12	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A screenshot of the capacity hosting map at the proposed location, showing the available capacity.	p.12	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Substantiating evidence of project cost in the form of charts and/or spreadsheet models.	p.16	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Certifications in Section C.	p.19-23	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Product Offering Questionnaire(s).	p.24	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Required Attachments for Exemptions	Page	Attached?
The Applicant is a government entity (municipal, county, or state), and the community solar developer will be selected by the Applicant via a Request for Proposals (RFP), Request for Quotations (RFQ), or other bidding process: ⇒ Attach a letter from the Applicant describing the bidding process	p.6, p.19	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The proposed community solar project is located, in part or in whole, on Green Acres preserved open space or on land owned by NJDEP. ⇒ Attach special authorization from NJDEP for the site to host a community solar facility.	p.8	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The proposed community solar project has received, in part or in whole, a subsection (t) conditional certification from the Board prior to February 19, 2019. ⇒ Attach a signed affidavit that the Applicant will immediately withdraw the applicable subsection (t) conditional certification if the proposed project is approved by the Board for participation in the Community Solar Energy Pilot Program.	p. 19	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

