

## Successor Solar Incentive (SuSI) Program Administratively Determined Incentive (ADI) Program Remote Net Metering Market Segment Training Frequently Asked Questions FAQ February 6, 2025

## WEBINAR SUBMITTED QUESTIONS AND ANSWERS

1. Question: Net Metered and Remote Net Metered projects can be co-located as long as they are not the same customer. Is that also true for Community Solar projects?

**Answer:** Remote Net Metered, and community solar facilities may not be located on the same or adjacent properties if their combined capacity exceeds five (5) MW (dc). Remote Net Metered projects shall not be considered co-located if they are located on rooftops of separate buildings on different properties and serve separate customers.

**2. Question:** Will this recording be posted on the website?

**Answer:** The webinar recording is currently posted on the <u>Remote Net Metering homepage</u> on the New Jersey's Clean Energy website.

**3. Question:** Can we get a copy of the presentation?

**Answer:** The presentation is currently posted on the <u>Remote Net Metering homepage</u> on the New Jersey's Clean Energy website.

**4. Question:** What are the reasons available to the EDC to deny an application, beyond identifying a customer as not being a public entity?

**Answer:** Please contact the appropriate EDC at <u>utility contact information</u> for additional information on their application requirements and review process.

**5. Question:** Did I hear correctly that the completion must be done 8 months after acceptance? Many required upgrades coming from EDCs have a 3+ year completion date. How is that handled?

**Answers:** RNM projects will be given 18 months from the date of acceptance to complete the installation, obtain permission to operate and submit the Final As-Built (Post Construction) documents in the online portal. RNM solar facilities that are installed on contaminated sites will

have 24-months from the date of acceptance to complete the installation, obtain permission to operate and submit the Final As-Built (Post Construction) documents in the online portal. RNM projects are eligible for an additional 6-month extension and can petition the Board for any further requests for extensions.

6. Question: Regarding a private property being accepted as a host site - does the public entity need to lease the site roof top space or land space on which it wishes to site the solar facility? Or can the private entity (for example, a warehouse) offer RNM to the public entities? in this case what is the incentive for the private entity?

**Answer**: A Remote Net Metered host solar facility may be located on any property owned, licensed or leased by the public entity or on any suitable private property. The ADI Program requirements for remote net metering solar facilities do not determine the contract structure entered into between all parties associated with the project. The incentive level for all remote net metering solar facilities is \$90/MWh and the ownership of the SREC-II is established through the agreed upon contract.

7. Question: Is acceptance into the Remote Net Metering market segment a guarantee of receiving the associated ADI incentive (assuming conditions are met). Phrased differently, will the ADI incentive also be on a first come first serve basis or will the amounts already be pre-allocated to the approved RNM projects?

Answer: Remote Net Metering solar facilities that are issued acceptance letters will be eligible for the administratively set \$90 SREC-II value contingent on satisfying all program requirements. Remote Net Metering registrations that are submitted in the online portal under this ADI Program market segment will be reviewed for completeness and acceptance on a first come first serve basis until the 50 MW (dc) capacity block has been fully subscribed.

**8. Question:** Will developers need to secure receiving customers before submitting a RNM project application?

**Answer:** Yes. All Remote Net Metering registrations submitted in the online portal will be required to include a list of the receiving customers, account numbers, each receiving account number's previous 12 months of electricity consumption (kWh)type of public entity (for example: state entity, school district, county authority, etc.)

**9. Question:** What are the maturity requirements to submit a RNM project application? Will they match CSEP?

**Answer:** The EDCs, in consultation with Board staff, will determine the maturity requirements for the remote net metering application. Following the issuance of a notice of administrative completeness, the EDC shall have twenty (20) business days to review the application for eligibility and feasibility, including the proposed system size and all account information, and make a recommendation to Board Staff to approve or deny.

**10. Question:** What constitutes a Public Entity?

**Answer:** The Board approved process in the 2018 RNM Order defines "public entity," for purposes of RNM eligibility, consistent with the list of entities identified as eligible for aggregated net metering in the Solar Act of 2012 (L. 2012, c. 24): State entity, school district, county, county agency, county authority, municipality, municipal agency or municipal authority. The Board further determined that the definition of "public entity" expressly includes public universities."

**11. Question:** What will the application fee/escrow be? Will it be similar to CSEP?

**Answer:** At this time, there is no escrow required to be submitted for remote net metered solar facilities.

**12. Question:** Do you have any explanation of why the public entities adder was not maintained for RNM?

**Answer:** Solar facilities that participate under the Remote Net Metering component of the ADI Program will be eligible for the same SREC-II value as solar facilities that participate in the Community Solar Energy Program (CSEP). Due to increased siting opportunities and greater facility size allowed in the revised program, Board Staff does not recommend any additional adder for RNM projects.

**13. Question:** Is it a co-location problem to have a Remote Net Metered project on the same location as a traditional BTM SuSI system?

Answer: Co-location is prohibited for RNM projects in the same fashion that it is prohibited for CSEP projects; it is not permitted unless the Board grants a waiver in response to a petition. N.J.A.C. 14:8-11.4(f). Co-location is defined as siting two or more SuSI-eligible solar facilities on the same property or on contiguous properties such that the individual facilities sum to greater than 5 MW in aggregate and/or are eligible for a higher incentive value or different program than they would be if they combined into one single facility. RNM facilities located on different rooftops on separate buildings and different properties, regardless of ownership, are not considered co-located. Furthermore, an RNM solar facility and a net metered facility are not deemed co-located if they serve separate customers. If the review of the Post Construction Certification (Final As-Built) packet or project inspection reveal that the registrant failed to disclose co-located solar facilities, the Board may take enforcement action, including but not limited to adjusting the incentive downward by multiplying the aggregated project size by the lowest incentive level among the projects' qualifying market segments.

**14. Question:** We have a RNM project that was accepted into the regular net-metered market segment program [segment?] on the SuSI portal. (This is before we were aware of the fact that there would be a dedicated carve-out for RNM and that it would come with a lower ADI.) What is the process for transferring it over to the RNM portal?

**Answer:** Solar facilities that were accepted under the ADI Program under a different market segment that now want to participate under the remote net metering market segment would be required to cancel the existing ADI registration and resubmit a new registration in the Remote Net Metering

online portal. The new Remote Net Metering registration will have no reference to the previous ADI submission and will be viewed as a new registration with a new acceptance and expiration date.

**15. Question**: For a project with a registration that was accepted in the traditional Net Metered market segment that is awaiting transition into the Remote Net Metering portal, is there a restriction against beginning construction before formal acceptance in the RNM bucket, or is it enough that the project was accepted into the regular BTM program?

**Answer:** Remote Net Metering solar facilities are prohibited from "Commencing Construction," (defined as obtaining permission to operate or PTO) prior to receipt of acceptance into the RNM market segment of the ADI program. Solar facilities that obtain PTO prior to the issuance of the RNM acceptance letter will be required to petition the Board for eligibility in the ADI program.

**16. Question:** Tammy mentioned remote net metering facility located on a privately owned rooftop. Does it have to be a rooftop? Can it be a landfill where the facility will be grid connected?

**Answer:** A remote net metered host solar facility may be located on either property owned, licensed or leased by the public entity or on any suitable private property. Solar system siting is not restricted to just rooftop installations. Net metered solar facilities 5 MW (dc) or less on contaminated sites are eligible to participate in the Remote Net Metering market segment. All grid supply and net metered solar facilities over 5 MW (dc) are required to participate in the CSI Program, be awarded through a solicitation process and be conditionally certified via Board Order.

## **Contact Information:**

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