



Agenda Date: 6/8/22  
Agenda Item: LSA

**STATE OF NEW JERSEY**  
**Board of Public Utilities**  
44 South Clinton Avenue, 1<sup>st</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350  
[www.nj.gov/bpu/](http://www.nj.gov/bpu/)

CLEAN ENERGY

IN THE MATTER OF A NEW JERSEY SOLAR TRANSITION PURSUANT TO P.L. 2018, C.17	)	ORDER
	)	DOCKET NO. QO19010068
IN THE MATTER OF REQUEST FOR AN EXTENSION OF TIME TO COMPLETE NJSTRE1545046932 IN TRANSITION INCENTIVE PROGRAM - 480 SOUTH DEMOCRAT ROAD, GIBBSTOWN NJ ESNJ-KEY- GIBBSTOWN, LLC	)	DOCKET NO. QO22030156

**Parties of Record:**

**James C. Meyer, Jr., Esq.**, Riker, Danzig, Scherer, Hyland & Perretti LLP, on behalf of ESNJ-KEY-GIBBSTOWN, LLC

**Matthew Karmel, Esq.**, Riker, Danzig, Scherer, Hyland & Perretti LLP, on behalf of ESNJ-KEY-GIBBSTOWN, LLC

BY THE BOARD:

By this Order, the New Jersey Board of Public Utilities (“Board” or “NJBPU”) considers the petition of ESNJ-KEY-GIBBSTOWN, LLC (“Gibbstown” or “Petitioner”) for an extension of time to complete a solar project registered in the Transition Incentive (“TI”) Program, conditionally grants Petitioner a six (6) month extension, and makes conditional extensions available to similarly situated parties on comparable terms.

**BACKGROUND**

On May 23, 2018, the Clean Energy Act was signed into law and became effective immediately.<sup>1</sup> Among many other mandates, the Clean Energy Act directed the Board to adopt rules and regulations to close the Solar Renewable Energy Certificate (“SREC”) Registration Program (“SREC Program” or “SRP”) to new applications once the Board determined that 5.1 percent of the kilowatt-hours sold in the State by Third Party Suppliers and Basic Generation Service

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<sup>1</sup> L. 2018, c. 17 (“Clean Energy Act” or “Act”).

providers had been generated by solar electric power generators connected to the distribution system. The Clean Energy Act also directed the Board to complete a study (“Capstone Report”) that evaluates how to modify or replace the SREC Program to encourage the continued efficient and orderly development of solar renewable energy generating sources throughout the State.

On December 6, 2019, the Board established the TI Program to provide a bridge between the legacy SREC Program and a to-be-developed Successor Incentive program. The TI Program, subsequently codified in rules,<sup>2</sup> provides eligible projects with Transition Renewable Energy Certificates (“TREC”) for each megawatt-hour (“MWh”) of electricity produced. Incentives are tailored to specific project types through the use of factors, which are applied to a base incentive rate to provide a particular project type either the full incentive amount or a set percentage of that amount depending on the costs and anticipated revenue streams for the project type. Net metered non-residential projects located on rooftops and carports are eligible to receive a factor of 1.0 and thus the full amount of the base incentive, \$152/MWh. The TI Program portal opened to new registrations on May 1, 2020; pursuant to the Board’s December 6, 2022 Order and the TI Program rules, the TI Program remained open to new registrations until the establishment of a registration program for the new Successor Program.<sup>3</sup> The TI Program rules do not provide for automatic or administrative extensions to projects’ conditional registration “expiration dates” (also referred to as the registration deadline).

On July 29, 2020, the Board granted a blanket extension to all projects that registered in the TI Program on or before October 30, 2020, setting the new expiration date for all impacted registrations to October 30, 2021.

On April 21, 2021, BPU Staff (“Staff”) issued the New Jersey Successor Program Staff Straw Proposal (“Successor Straw Proposal”). The Successor Straw Proposal expanded on the two-pronged incentive program design suggested in the Capstone Report and provided Staff’s recommendations for suggested incentive levels, processes, market segment capacity caps, calculation of the statutorily mandated cost cap, and overall implementation of the Successor Program. Five public stakeholder workshops were conducted to address questions about the straw proposal and collect stakeholder feedback on Staff’s recommendations. Workshop number five, held on May 7, 2021, specifically addressed the proposed transition from the TI Program to the Successor Program.

On June 24, 2021, the Board granted projects registered in the TI Program on or before the effective date of the order an automatic six-month extension to their existing deadline established at N.J.A.C. 14:8-10.4(e) or (f).<sup>4</sup>

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<sup>2</sup> 52. N.J.R. 1850(a) (“TI Rules”).

<sup>3</sup> In re a New Jersey Solar Transition Pursuant to P.L. 2018, c. 17, BPU Docket No. QO19010068, Order dated January 8, 2020 (“January 2020 Order”); N.J.A.C. 14:8-10.1; and N.J.A.C. 14:8-10.4.

<sup>4</sup> In re a New Jersey Solar Transition Pursuant to P.L. 2018, c.17 – Order Addressing Requests for Extension for Projects in the Solar Transition Incentive Program, BPU Docket Nos. QO19010068 & QO21060883, Order dated June 24, 2021 (“June 2021 Order”).

On July 9, 2021, Governor Murphy signed the Solar Act of 2021 (L. 2021, c.169) into law, effective immediately. Among other requirements, this law directed the Board to develop and launch the Successor Program. On July 28, 2021, the Board announced the closure of the TI Program, effective 30 days later, and the opening of the Successor Solar Incentive (“SuSI”) Program.<sup>5</sup> The TI Program closed to new registrations on August 27, 2021, and the SuSI Program opened on August 28, 2021.

### **Petition**

Petitioner is the developer of a proposed 1.38 MW carport solar project in located in Gibbstown, New Jersey (hereinafter the “Gibbstown Project” or the “Project”). The Project has been the subject of two (2) petitions requesting an extension of deadlines in the TI Program, one filed in June 2021 (“June 2021 Petition”) and another filed on March 25, 2022 (“March 2022 Petition”). The March 2022 Petition was amended on April 30, 2022 (“April 2022 Amendment”).

The Gibbstown Project received conditional acceptance into the TI Program as a canopy net metered non-residential solar electric generation facility on June 15, 2020, with an initial TI expiration of June 15, 2021, registration number NJSTRE1545046932. The Gibbstown Project then received the two (2) extensions to the TI Program deadlines provided by the Board on a generic basis in its July 29, 2020 and June 24, 2021 Orders. These automatic extensions mooted the Project’s June 2021 Petition.

After taking into account the two (2) generic extensions provided by the Board, the Project had until April 30, 2022 to reach Permission to Operate (“PTO”) and submit the post-construction certification package for the Project (i.e., its TI Program expiration date). The March 2022 Petition requested that the Board grant a three-month extension to the expiration date, until July 30, 2022. The April 2022 Amendment then requested an additional extension until December 31, 2022.

Petitioner explained in its April 2022 Amendment that, “Petitioner has completed construction of the Project, received Conditional Permission to Operate, submitted a post-construction certification package, and documented that the Project is capable of being fully energized and connected to the grid[.]” April 2022 Amendment, at p 4. However, the Petitioner explained that Gibbstown was still awaiting permission from Atlantic City Electric Company (“ACE”) to deliver the Project’s full capacity to the grid because “ACE has not yet completed offsite upgrades necessary to allow interconnection for the full capacity of the Project.” Id. at 3. Because these upgrades are not complete, ACE “has issued a Conditional Permission to Operate” for 50 kW AC of the 1.3 MW project, potentially leaving the remainder of the Project without access to solar incentives. Id. The Conditional Permission to Operate is documented in Exhibit AA to the April 2022 Amendment.

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<sup>5</sup> In re a New Jersey Solar Transition Pursuant to P.L. 2018, C. 17, BPU Docket No. QO19010068, Order dated July 28, 2021.

In the April 2022 Amendment, Petitioner further verified that:

- “[E]ven though ACE initially advised that offsite upgrades necessary to connect the Project to the grid would have been completed in April 2022, ACE has now advised that it will not complete these upgrades until fall 2022.” Id. at 3.
- “Petitioner has promptly paid invoices to ACE and pressed ACE for status updates; yet interconnection delays have occurred that were beyond the control or responsibility of Petitioner.” Id.
- “Petitioner made a timely application for inclusion of the project in the TI program; it did not come at the tail end of the application window.” Id.
- “Despite significant supply chain disruptions, Petitioner completed construction of the Project and tested the Project prior to the Expiration Date, thereby demonstrating that it is capable of supplying its full capacity to the grid as of the Expiration Date.” Id.

Had the upgrades been completed within ACE’s initial projected timeframe, Petitioner asserted that it would have brought the Gibbstown Project on-line prior to its TI Program expiration date and qualified the full 1.38 MW project to receive TRECs.

The March 2022 Petition argued that the request for a three-month extension for a mature project that is “substantially complete,” was justified on the basis of interconnection delays caused by the electric distribution company that were out of its control, and specific supply chain delays that were not known to Petitioner at the time of application. Petitioner argued that its circumstances were distinguishable from other extension requests denied by the Board.

In the April 2022 Amendment, Petitioner requested that the Board provide relief in one of three alternative manners, presented in descending order of preference. Alternative 1: extension of the Project’s expiration date until 30 days from when ACE issues a PTO authorizing the Project to deliver its entire capacity to the grid. Alternative 2: extension of the Project’s expiration date until December 31, 2022 to allow ACE to complete the necessary upgrades. Alternative 3: accept a Conditional PTO for the Project documenting the generation of 50 kW AC from the Project as part of a post-construction certification package for the Project.

## **STAFF RECOMMENDATION**

### **The Gibbstown Project**

Staff believes that a short-term extension to the expiration date may be justified when projects are mechanically and electrically complete, have all necessary permits and inspections, but are prevented from receiving PTO because of unanticipated and unforeseeable delays in the electric distribution company’s (“EDC’s”) completion of interconnection upgrades, and that the delays occurred post-execution of an interconnection agreement.

Based on the facts presented in the March 2022 Petition and the April 2022 Amendment, Staff concludes that the Gibbstown Project may be a candidate for an extension and recommends granting Petitioner a conditional extension of its expiration date, conditioned on it making the showings set forth below. Staff’s analysis suggests that Gibbstown had reached electrical and

mechanical completion, had submitted its post-construction certification package, and, in fact, received conditional approval from the EDC to operate a portion of the project (50 kW), which is the capacity of generation that can currently be accommodated by the distribution system pending completion of the delayed interconnection upgrades.

Staff notes that it has traditionally been reluctant to recommend that the Board provide extensions for solar projects that miss their expiration dates because of supply chain issues, general interconnection processing delays, and other factors that, while regrettable, do not rise to the level of warranting an extension. The interim nature of the TI Program has been consistently communicated by the Board to market participants since the TI Program was first proposed in 2019. The requirement for projects to complete construction, commence commercial operation, and submit post-construction certification materials within one year of projects' conditional acceptance in the Program is embodied in the TI Program rules. Those rules do not provide for extensions, and that absence of an extension policy was intentional.

With respect to the Petitioner's documentation for delays in the project, Staff notes the following facts that mitigate in favor of making an exception in this matter.

*First*, the Petitioner appears to have done everything in its power to complete its Project prior to its April 30, 2022 expiration date. This included completing electrical and mechanical construction, submitting post-construction certification packages, securing and satisfying all necessary permits, and energizing the portion of the Project that the ACE system was able to accommodate without further upgrades. Petitioner asserted that it was able to finish construction of its Project despite a series of supply chain disruptions, including difficulty in ordering solar modules and circuit breakers.<sup>6</sup> Staff is sensitive to concerns about ongoing supply chain delays, but notes that the Board previously considered petitions which alleged supply chain delays, and found that such delays did not, based on the record presented to the Board, constitute sufficient grounds to waive TI Program requirements.

*Second*, according to the facts presented in the petition, Petitioner acted expeditiously to receive an interconnection agreement from ACE and promptly paid any and all outstanding invoices for the upgrades required, when billed by ACE.<sup>7</sup> Staff notes favorably Petitioner's diligent pursuit of interconnection and the willingness to put capital at risk in funding the necessary upgrades.

*Third*, according to the April 2022 Amendment, ACE had advised Gibbstown that the interconnection upgrades would be completed by April 2022, which would have allowed sufficient time for the full Project to reach PTO prior to the Project's April 30, 2022 expiration date. The Petition alleges that subsequent communication from ACE delayed estimated completion of the interconnection upgrades to fall 2022. Staff notes that the Petitioner alleged a delay in completing system upgrades that were agreed to by both the EDC and the Petitioner. This fact differentiates this matter from others where project developers were unable to complete interconnection agreement negotiations or where completion of interconnection *studies* took longer than expected. Here, Petitioner alleges that, after the time it executed the interconnection agreement,

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<sup>6</sup> In particular, Petitioner was notified in January 2022 that the solar modules that had been ordered were unavailable, and in February 2022 of a delay in the delivery of circuit breakers until mid-April.

<sup>7</sup> Staff notes Petitioner's troubling assertion that the invoices were issued 10 and 16 months after Petitioner returned the executed interconnection agreement to ACE. However, Staff does not believe that the invoice processing times are directly material to this discussion.

it had the good faith belief that ACE would complete the necessary upgrades to other portions of the distribution system owned by ACE, prior to Gibbstown's expiration date. In such circumstances, Staff does not believe that Petitioner should be penalized for making the commercially reasonable decision to move forward with constructing and financing the Project. If Petitioner substantiates this claim, it strongly suggests that Petitioner had a reasonable expectation that ACE was expected to have completed system upgrades prior to the Project's April 30, 2022 expiration date.

*Fourth*, the record evidence shows that the developer of the Gibbstown Project submitted its interconnection application in March 2020 and has diligently pursued its interconnection since. Thus, this does not appear to be a case of a project coming into the TI Program with an underdeveloped project development plan.

Based on the observations and analysis above, Staff recommends that Petitioner be directed to provide certain information described below in a revised post-construction certification package (required pursuant to N.J.A.C. 14:8-10.4(f)(4)(ii) and 14:8-10.4(g)) submitted into the TI Program registration portal, within 30 days of the effective date of the Board's Order. If this information is provided and satisfies Staff and the TI Program administrator, Staff recommends the Board permit the TI Program administrator to issue Petitioner a revised conditional acceptance letter with a six-month extension from the prior expiration date. Staff recommends that, in order to potentially qualify for the extension, Petitioner provide the following:

1. Copies of the certificate of completion from the authority having jurisdiction, representing satisfaction of all required permits (e.g. building, electrical, fire);
2. Date-stamped pictures of the array, inverter, and balance of system, as described in the TI Program Final As-Built checklist;
3. Evidence that project construction was proceeding based on an estimate from ACE that the interconnection upgrades would be completed by April 2022, and evidence of subsequent communication from ACE advising that the interconnection upgrades were delayed until fall 2022;
4. A copy of the Part II/Part B Interconnection Agreement submitted to the relevant EDC, or comparable communication to the EDC that the solar electric generation facility has been completed and is ready for EDC inspection;
5. A completed and signed TI Final As-Built Technical Worksheet; and
6. Any additional information as may be requested by Board Staff and/or the TI Program administrator for purposes of determining the Project's eligibility for a TI Program extension.

If Petitioner cannot provide the documentation described above to the satisfaction of Staff and the TI Program administrator in order obtain an extension to its TI Program registration deadline, Staff recommends that the Board allow the TI Program administrator to process the final-as-built paperwork for the 50 kW AC portion of the system that received conditional PTO from ACE and allow the Petitioner to register the remaining capacity as a separate project in the Administratively Determined Incentive ("ADI") Program. Staff notes, in the latter scenario, the portion of the Project

registered in the ADI Program would require installation of a separate revenue grade meter, so as to ensure separate accounting of production for the two (2) different incentive programs.

Similarly Situated Projects

Staff further recommends that the opportunity for a single six-month extension should be available to other projects with currently active registrations in the TI Program that can demonstrate similar circumstances, specifically that the project is fully ready to energize, but for the lack of permission to operate from the EDC, due to factors that are the sole responsibility of the EDC, and that the initial expiration date was consistent with the EDC's construction schedule at the time the parties entered into the interconnection agreement or in a subsequent communication from the EDC. Therefore, Staff recommends that the Board permit Staff and the TI Program administrator to receive and assess requests for conditional extensions based on standardized criteria derived from the documentation required of Petitioner above. Projects that provide satisfactory documentation would receive a six-month extension, during which time they would be required to return to the project's TI Program portal and upload the missing documents (e.g. EDC notification of PTO) in order to finalize eligibility to produce TRECs and receive a New Jersey certification number.

Specifically, Staff recommends that the Board waive, in certain cases, the portion of its rules that require projects with registrations in the TI Program to commence commercial operations on or before their existing deadline established at N.J.A.C. 14:8-10.4(e) or (f) in order to permit a single six-month extension to qualifying projects as described above.

Staff recommends that the Board require registrants seeking such relief to submit the following into the TI Program registration portal as part of a post-construction certification package, prior to the project's TI Program expiration date.

1. Copies of the certificate of completion from the authority having jurisdiction, representing satisfaction of all required permits (e.g. building, electrical, fire);
2. Date-stamped pictures of the array, inverter, and balance of system, as described in the TI Program Final As-Built checklist;
3. If the project is waiting for the completion of necessary interconnection upgrades by the EDC, evidence that project construction was proceeding based on an estimate from the relevant EDC that the interconnection upgrades would be completed by the project's TI Program deadline, evidence demonstrating upgrades were fully funded by the project developer, and evidence of communication from EDC advising that the interconnection upgrades were subsequently delayed past the timeline identified at the time or after the interconnection agreement was agreed to;
4. A copy of the Part II/Part B Interconnection Agreement submitted to the relevant EDC, or comparable communication to the EDC that the solar electric generation facility has been completed and is ready for EDC inspection;
5. A completed and signed TI Final As-Built Technical Worksheet; and
6. Any additional information as may be requested by Board Staff and/or the TI Program administrator for purposes of determining a project's eligibility for a TI extension.

## **DISCUSSION AND FINDINGS**

The Board has been a longstanding supporter of solar in New Jersey and aims to design policies and programs that support the continued growth of the solar industry while carefully balancing the costs and benefits to ratepayers. The general purpose of the TI Program Rules, as well as the timelines contained therein, is to provide a smooth transition to the Successor Program and support to New Jersey's thriving solar market while safeguarding the interest of the State's ratepayers by doing so at the lowest possible cost.

In keeping with this mission, the Board carefully reviews the facts and circumstances of each petition requesting an extension of a project's conditional registration in the TI Program in order to determine whether such an extension is in the public interest.

The Board's rules state that "[i]n special cases, upon a showing of good cause the Board may, unless otherwise specifically stated, relax or permit deviations from these rules." N.J.A.C. 14:1-1.2(b). The Board's rules go on to explain that "[t]he Board shall, in accordance with the general purpose and intent of the rules, waive section(s) of its rules if full compliance with the rule(s) would adversely affect the ratepayers of a utility or other regulated entity, the ability of said utility or other regulated entity to continue to render safe, adequate and proper service, or the interests of the general public " N.J.A.C. 14:1-1.2(b)(1).

Having carefully reviewed the petition and Staff's recommendation, the Board **FINDS** that if Gibbstown can substantiate the claims made in its petition, the unforeseeable delay in the EDC's completion of its upgrades represents good cause to waive the deadline established at N.J.A.C. 14:8-10.4(e) or (f) in order to permit a six (6) month extension of the Project's TI Program registration deadline. The Board is concerned that, under the unique circumstances occasioned by the end of the TI Program, solar developers that enter into interconnection agreements with the explicit understanding that interconnection upgrades would be complete prior to a project's TI Program expiration not be penalized for delays in the EDC's construction of upgrades that were funded in good faith by the project developer. In evaluating conditional waiver requests, the TI Program administrator should review the construction schedule presented by the EDC at the time or after the interconnection agreement was executed, to determine if the EDC's estimated construction schedule was consistent with the project's TI Program expiration date. So long as the developer timely provided any necessary deposits at the time billed by the EDC, met all other requirements imposed by the EDC, and the construction schedule was otherwise feasible within the constraints of the TI Program, then the Board believes that solar developers who reasonably relied on the EDC's schedule, and proceeded with the project, should be provided relief. The Board **FINDS** that the following factors constitute good cause to partially waive the TI expiration dates in the Board's rules:

1. The project can demonstrate that it was electrically and mechanically complete prior to its TI Program expiration date, which the Board interprets as a project that could be energized, but for the lack of a necessary permission to operate from the EDC due to factors that are the sole responsibility of the EDC;
2. The project can demonstrate that it had received and satisfied all necessary permits from all authorities having jurisdiction over the project prior to its TI Program expiration date, including required final inspections; and

3. Project construction was proceeding based on a representation from the EDC that any necessary interconnection upgrades would be completed prior to the project's TI Program expiration date, that the upgrades were fully funded by the project developer, but that despite the developer's best efforts, the estimated upgrade completion date was unilaterally extended by the EDC.

Therefore, the Board **GRANTS** Petitioner a conditional 6-month extension to the Project's April 30, 2022 TI Program registration deadline. This extension will take effect if, and only if, Petitioner provides Staff and the TI Program administrator with the information below through an amendment to the Project's post-construction certification package filed via the TI Program registration portal within 30 days of the effective date of this Order. Because in this particular case, the TI expiration date already passed, the Board will accept evidence produced within the 30-day period that attests to the fact that the information was accurate as of April 30, 2022, when the Project's conditional registration expired.

Further, the Board notes that the circumstances alleged by the Petitioner may not be unique to Gibbstown, and the Board **FINDS** that granting similarly situated parties a comparable 6-month waiver of the TI Program expiration date established at N.J.A.C. 14:8-10.4(e) or (f) is warranted for projects that can make a similar showing.

To be eligible for a six month extension, the Board **REQUIRES** that Gibbstown and any similarly situated petitioners meet the three conditions set forth above, and produce the following substantiation:

1. Copies of the certificate of completion from the authority having jurisdiction, representing satisfaction of all required permits (e.g. building, electrical, fire);
2. Date-stamped pictures of the array, inverter, and balance of system, as described in the TI Program Final As-Built checklist;
3. If the project is waiting for the completion of necessary interconnection upgrades by the EDC, evidence that project construction was proceeding based on an estimate from the relevant EDC that the interconnection upgrades would be completed by the project's TI Program deadline, evidence demonstrating upgrades were fully funded by the project developer, and evidence of communication from EDC advising that the interconnection upgrades were subsequently delayed past the timeline identified at the time or after the interconnection agreement was agreed to;
4. A copy of the Part II/Part B Interconnection Agreement submitted to the relevant EDC, or comparable communication to the EDC that the solar electric generation facility has been completed and is ready for EDC inspection;
5. A completed and signed TI Final As-Built Technical Worksheet; and
6. Any additional information as may be requested by Board Staff and/or the TI Program administrator for purposes of determining a project's eligibility for a TI extension.

Any project developer that believes it is similarly situated to Gibbstown, and thus eligible for a comparable conditional waiver of the Board's rules may, at its election, apply to the Board's TI Program administrator, TRC, through a post-construction certification package submitted prior to

the project's TI Program expiration date. For projects that satisfy the requirements set forth above, the Board **DIRECTS** the TI Program administrator to issue Petitioner a revised conditional acceptance letter with a six (6) month extension from the prior expiration date.

The Board **DIRECTS** project developers with TI Program extension request petitions currently pending before the Board that seek to take advantage of this conditional waiver process notify the Board Secretary that they intend to seek relief pursuant to this Order within 30 days of the effective date of this Order. In such cases, the Board intends to hold the related petitions in abeyance until the TI Program administrator completes its analysis, at which point, entities that do not receive relief are directed to notify the Board Secretary whether they elect to withdraw their petitions or request that the Board move forward in adjudicating them on other grounds.

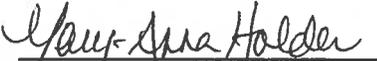
Finally, the Board recognizes that Gibbstown may or may not qualify for the conditional extension. If Gibbstown ultimately does not qualify for the conditional extension, then the Board **GRANTS** in the alternative Gibbstown's request to allow the 50 kW AC portion of the system to qualify to participate in the TI Program, and allow the remainder of the Project to register in the ADI Program as a separate registration. The Board **FINDS** that waiver of the Board's rules is warranted to prevent the outcome where the Gibbstown Project would be barred from receiving any solar incentive, which could undermine confidence in New Jersey's solar program and increase the regulatory risk in a manner that could increase future development costs. To prevent this unreasonable outcome, the Board **DIRECTS** the TI Program administrator, if Gibbstown does not meet the standards for a conditional extension, to process the final-as-built paperwork for the 50 kW AC portion of the system that received conditional PTO from ACE, and allow the Petitioner to register the remaining capacity as a separate project in the ADI Program, conditioned on Petitioner installing a separate revenue grade meter, so as to ensure separate accounting of production for the two different incentive programs.

The effective date of this Order is June 8, 2022.

DATED: 6/8/2022

BOARD OF PUBLIC UTILITIES  
BY:

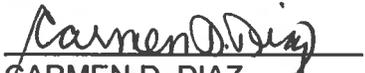
  
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IN THE MATTER OF A NEW JERSEY SOLAR TRANSITION PURSUANT TO P.L. 2018, C.17  
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ESNJ-KEY-GIBBSTOWN, LLC  
DOCKET NO. QO22030156

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