

Agenda Date: 12/18/13

Agenda Item: 8B

# STATE OF NEW JERSEY

Board of Public Utilities 44 South Clinton Avenue, 9<sup>th</sup> Floor Post Office Box 350 Trenton, New Jersey 08625-0350 www.nj.gov/bpu/

	CLEAN ENERGY
	ORDER
IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C. 24, THE SOLAR ACT OF 2012	) ) DOCKET NO. E012090832V
IN THE MATTER OF THE IMPLEMENTATION OF L. 2012, C. 24, N.J.S.A. 48:3-87(T) – A PROCEEDING TO ESTABLISH A PROGRAM TO PROVIDE SOLAR RENEWABLE ENERGY CERTIFICATES (SRECS) TO CERTIFIED BROWNFIELD, HISTORIC FILL AND LANDFILL FACILITIES	) ) ) ) ) DOCKET NO. E012090862V
KDC SOLAR RTC, LLC DELILAH ROAD LANDFILL	) ) ) DOCKET NO. QO13111129
PUBLIC SERVICE ELECTRIC AND GAS COMPANY KINSLEY LANDFILL	) ) ) DOCKET NO. QO13111111

#### Parties of Record:

Stefanie A. Brand, Esq., Director, New Jersey Division of Rate Counsel Thomas P. Lynch, KDC Solar RTC, LLC Robert Pollock, Public Service Electric and Gas Company

BY THE BOARD:

### **BACKGROUND**

On July 23, 2012, L. 2012, c. 24 ("Solar Act") was signed into law by Governor Chris Christie. The Solar Act amends certain aspects of the statute governing generation, interconnection, and financing of renewable energy. Among other actions, the Solar Act requires the New Jersey Board of Public Utilities ("Board" or "BPU") to conduct proceedings to establish new standards and to develop new programs to implement the directives. On October 4, 2012, the Board directed Board staff ("Staff") to initiate proceedings and convene a public stakeholder process to fulfill the directives of the Solar Act. Docket No. EO12090832V ("October 4 Order").

### Subsection (t) of the Solar Act provides that:

No more than 180 days after [July 23, 2012], the board shall, in consultation with the Department of Environmental Protection and the New Jersey Economic Development Authority, and, after notice and opportunity for public comment and public hearing. complete a proceeding to establish a program to provide SRECs to owners of solar electric power generation facility projects certified by the board, in consultation with the Department of Environmental Protection, as being located on a brownfield, on an area of historic fill or on a properly closed sanitary landfill facility. . . Projects certified under this subsection shall be considered "connected to the distribution system" [and] shall not require such designation by the board[.] . . . . [F]or projects certified under this subsection, the board shall establish a financial incentive that is designed to supplement the SRECs generated by the facility in order to cover the additional cost of constructing and operating a solar electric power generation facility on a brownfield, on an area of historic fill or on a properly closed sanitary landfill facility.

[N.J.S.A. 48:3-87(t)]

The Solar Act defines the terms "brownfield", "area of historic fill," and "properly closed landfill. A "brownfield" is "any former or current commercial or industrial site that is currently vacant or underutilized and on which there has been, or there is suspected to have been, a discharge of a contaminant." N.J.S.A. 48:3-51. "Historic fill" is "generally large volumes of non-indigenous material, no matter what date they were placed on the site, used to raise the topographic elevation of a site[.]" [bid. A "properly closed sanitary landfill facility" means "a sanitary landfill facility, or a portion of a sanitary landfill facility, for which performance is complete with respect to all activities associated with the design, installation, purchase, or construction of all measures, structures, or equipment required by the [DEP.]" [bid.

In an Order dated January 23, 2013, Docket. No. EO12090862V ("January 23 Order"), the Board approved a process for certifying solar generation projects as being located on brownfields, areas of historic fill, and landfills. The certification process for projects seeking approval pursuant to subsection (t) provides three potential recommendations from Staff to the Board: full certification, conditional certification, or denial of certification. Conditional certification may be granted for projects located on sites which the NJDEP has determined require further remedial action or, in the case of properly closed landfills, additional protective measures, and full certification may be granted for projects located on sites for which the NJDEP has determined no further remedial or protective action is necessary. January 23 Order, at 12-13. The process incorporates the expertise of the NJDEP to confirm a potential project's land use classification for eligibility and to account for the state of remediation of the project site. Ibid.

The Board found that an application for solar projects located on brownfields, areas of historic fill, or properly closed sanitary landfills was necessary in order to initiate the certification process and directed Staff to work with NJDEP to develop an application. <u>Id.</u> at 13. On or about April 10, 2013, Staff distributed, via the public renewable energy stakeholder email distribution list and posted to the NJCEP and BPU websites, a subsection (t) application form. This order considers two applications that were filed with the Board.

The Board further found that the Solar Act requires the development of an incentive to offset the increased costs of siting solar generation facilities on the areas covered by subsection (t) and directed Staff to continue working with the NJDEP, the NJEDA, and the stakeholders to develop a process to determine appropriate incentives. <u>Ibid.</u> The Board further directed Staff to coordinate any incentive developed with the incentives to be provided to solar projects located on landfills pursuant to the Electric Distribution Companies' ("EDC") SREC financing programs. Ibid.

Financial incentives for projects developed under subsection (t) are found in the programs developed by the EDCs in response to the Board's Order of May 23, 2012, Docket EO11050311V. The EDCs continue to maintain EDC SREC financing programs. For example, on May 29, 2013, the Board approved a settlement stipulation for Public Service Electric and Gas' ("PSE&G") Solar 4 All Extension program and its Solar Loan III program. In the Matter of Petition of PSE&G for Approval of an Extension of a Solar Generation Investment Program and Associated Cost Recovery Mechanism and for Changes in the Tariff for Electric Service. B.P.U.N.J. No. 15 Electric Pursuant to N.J.S.A. 48:2-21, 48:2-21.1 and N.J.S.A. 48:3-98.1, Docket No. EO12080721 (May 31, 2013); In the Matter of Petition of PSE&G for Approval of a Stipulation Solar Loan III Program and Associated Cost Recovery Mechanism and for Changes in the Tariff for Electric Service, B.P.U.N.J. No. 15 Electric Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, Dkt. No. EO12080726 (May 31, 2013). In addition, the other three EDCs have filed petitions for extensions of their SREC-based finance programs which each contain provisions for solar projects on landfills and brownfields.

Given the existing solar market conditions where the supply of SRECs significantly exceeds the demand created by the solar RPS, Staff sees no valid reason to create additional incentives to be funded by the ratepayer. At the Board's Agenda meeting of June 21, 2013, Staff recommended that no funding be provided for any solar rebates through the New Jersey Clean Energy Program ("NJCEP").<sup>1</sup>

On November 26, 2013, the Board conditionally approved two applications for solar generation facilities seeking eligibility to create SRECs pursuant to the Solar Act's subsection (t). N.J.S.A. 48:3-87(t). The Board approved Staff recommendations to change the subsection (t) process for conditionally approved projects with respect to the applicant's requirements in the SREC Registration program based upon experience with the process established.

The January 23 Order states that certification would be limited to those areas delineated by the NJDEP. In compliance with this directive, applicants are required to delineate the precise section(s) of the location where the solar facility is proposed to be sited and the NJDEP reviewed this material in making its recommendation.

Projects certified under subsection (t) of the Solar Act are subject to all of the Board's rules; the statutory language exempts such projects from the need for further Board designation as "connected to the distribution system" but does not remove any of the Board's oversight authority. For example, following receipt of conditional certification, once a contract for facility installation has been executed, these projects will need to be registered in the Board's SREC Registration Program ("SRP") within ten days. The size and location of the subject project would then be reflected in the public reporting of solar development pipeline data.

<sup>&</sup>lt;sup>1</sup> I/M/O the Comprehensive Energy Efficiency and Renewable Energy Resource Analysis for Fiscal Years 2014 through 2017 Clean Energy Program Docket No. EO11050324V (June 21, 2013).

## SREC Registration

In the January 23 Order, the Board ruled that only those projects that have received a full certification would be eligible to register in the SRP; "full certification is a pre-requisite to consideration for acceptance into the SRP". However, the Board found that this requirement is in conflict with the SREC Registration rules at N.J.A.C.14:8-2.4, which require a solar electric generation project to submit a registration within 10 days of executing a contract to install a solar system or to purchase panels for solar system. Subsequently, on July 19, 2013, the Board reversed that portion of the January 23 Order and required developers to comply with the SREC Registration rules at N.J.A.C.14:8-2.4 Staff believes it is important for the Board to maintain the requirement that an applicant submit a registration for a project within 10 days of contract execution. As a result, the Board found that applicants comply with the requirements of the SREC Registration rules at N.J.A.C. 14:8-2.4 and the deadlines set forth therein. Docket. Nos. EO12090862V, EO13050389V, EO13050388V ("July 19 Order").

## STAFF RECOMMENDATIONS

### Project Descriptions

This Order deals with Staff's recommendation on two projects: the Delilah Road Landfill proposed to be located in Egg Harbor and the Kinsley Landfill to be constructed in Deptford Township. The applicants seeking certification submitted the required documentation to enable a NJDEP determination as to whether the proposed site was a brownfield, area of historic fill, or properly closed landfill. The NJDEP reviewed each application and supplied an advisory memo to Board Staff on the land use classification and the closure or remediation status of each proposed site. On the basis of the NJDEP's determination, information contained in the application, and the January 23 Order, Staff is recommending conditional certification for Delilah Landfill for Kinsley Landfill, as explained further below.

Date Submitted	Submitted by	Contact Address	Developer	Project/ Designation Address	Location Town	County	Landfill, Brownfield, or Historic Fill	Апау Size (MWdc)	I FDC	Staff Recommends
9/27/2013	Thomas P. Lynch	1545US Higway 206 Suite 110 Bedminster, NJ 07921	KDC Solar RTC, LLC	Delilah Road Landfill	1307 Doughty Road & 34 Atlantic Avenue Egg Harbor, NJ 08234	Atlantic	Landfill	11.48	ACE	Conditionally Certified
10/29/2013		4000 Hadiey Road South Plainfield, NJ 07080	Public Service Electric & Gas (PSE&G)	Kinsley Landfill	2025 Delsea Drive Deptford Township, NJ 08080	Gloucester	Landfill	10	PSE&G	Conditionally Certified

#### Delilah Road Landfill - (Egg Harbor Township) - Dkt. No. QO13111129

On September 27, 2013, KDC Solar RTC, LLC ("KDC" or "applicant") submitted an application to the Board to have the project identified as Delilah Road Landfill certified as located on a properly closed landfill pursuant to subsection (t) of the Solar Act. KDC's 11.48 MWdc project is located in Egg Harbor, New Jersey. On its application, KDC represented that the Delilah Road Landfill project is proposed to be located on a sanitary landfill which ceased operations in 1980.

Staff forwarded the application to NJDEP for review and a recommendation as described above.

NJDEP advised Board Staff that it reviewed the application and found that the applicant is a delisted, NJDEP-lead Superfund site for which NJDEP has completed remediation activities and the capping of the land fill. In addition, the applicant had acquired a Coastal Jurisdictional Determination and a Sanitary Landfill Minor/ Major Disruption Approval to install the proposed solar facility. NJDEP informed Board Staff that the landfill must address the environmental controls at the site. Staff recommends that the project be conditionally approved and that the applicant comply with all DEP requirements, including retaining a Licensed Site Remediation Professional to ensure the solar project does not jeopardize the remedy implemented at the site.

Based on the information provided in the application and NJDEP's indication that additional protective measures are necessary, Staff recommends conditional certification. Full certification is conditioned upon the Delilah Road Landfill's project developers satisfying NJDEP permit requirements for construction of the solar facility.

# Kinsley Landfill- (Deptford Township) - Dkt. No. QO13111111

On October 29, 2013, Public Service Electric and Gas Company ("PSE&G" or "applicant") submitted an application to the Board to have its Kinsley Landfill project certified as located on a properly closed landfill pursuant to subsection (t) of the Solar Act. PSE&G's 10 MWdc project is located in Deptford Township, New Jersey. On its application, PSE&G represented that the Kinsley Landfill project is proposed to be located on a sanitary landfill which ceased operations in 1987.

Staff forwarded the application to the NJDEP for review and a recommendation as described above. NJDEP advised Board Staff that it reviewed the application and found that the landfil received Closure and Post-Closure Care Plan Approval on July 1, 1987. NJDEP further advised Board Staff that it subsequently issued a letter to the applicant in July 1989 indicating that the clay materials used were acceptable and that capping system had been installed in general conformance with the Closure Plan Approval. NJDEP informed Board Staff that Kinsley Landfill's project developers must address the environmental controls at the site. Staff recommends that the project be conditionally approved and that the applicant retain a Licensed Site Remediation Professional to ensure the solar project does not jeopardize the remedy implemented at the site.

Based on the information provided in the application and NJDEP's indication that additional protective measures are necessary, Staff recommends conditional certification. Full certification is conditioned upon the Kinsley Landfill's project developers satisfying NJDEP permit requirements for construction of the solar facility.

## **FINDINGS AND CONCLUSIONS**

The Board <u>FINDS</u> that Staff has consulted with the NJDEP with regard to the development of an application for certification of solar generation as being located on brownfields, areas of historic fill, and properly closed sanitary landfills. The Board <u>FINDS</u> that Staff transmitted the two applications discussed above to NJDEP for a determination of eligible land use type and status of remediation on the proposed sites.

#### Delilah Road Landfill

Based on information provided by NJDEP, the Board <u>FINDS</u> that the Delilah Road Landfill project is located on land meeting the definition of a "properly closed landfill." The Board also <u>FINDS</u> that NJDEP has determined that "environmental controls at the site, such as the protection or re-establishment of the final cap, leachate collection, gas collection and storm water collection systems, settlement, slope stability, control of erosion, on-going maintenance, monitoring and source of funding" must be accounted for to construct the solar project.

The Board FINDS that Delilah Road Landfill project must satisfy NJDEP requirements and DIRECTS Delilah Road Landfill project developers to obtain a Licensed Site Remediation Professional and demonstrate to Staff that they have satisfied all NJDEP requirements for full certification. The Board DIRECTS Staff to issue full certification to the Delilah Road Landfill project upon the applicant's demonstration that it has satisfied all requirements for full certification. Finally, and after it has received full certification and satisfied all SRP requirements, the Board DIRECTS Staff to issue a New Jersey Certification Number to the Delilah Road Landfill project for purposes of SREC creation, provided that all requirements of N.J.A.C. 14:8-2.4 are met.

# Kinsley Landfill

Pursuant to the January 23 Order, conditional certification may be granted when "specific action must be taken to protect the integrity of the closed landfill or otherwise prevent contamination and full certification will be recommended when the conditions imposed have been met." January 23 Order at 13. Because NJDEP has described additional permits or permit equivalents that must be obtained before the Kinsley Landfill project may begin construction, the Board <u>FINDS</u> that conditional certification is appropriate.

Based on information provided by DEP, the Board <u>FINDS</u> that the Kinsley Landfill project is located on land meeting the definition of a "properly closed landfill." The Board also <u>FINDS</u> that NJDEP has determined that the applicant must address environmental controls in place at the site prior to construction of the solar project, such as the protection or re-establishment of the final cap, leachate collection, gas collection and storm water collection systems, settlement, slope stability, control of erosion, on-going maintenance, monitoring and source of funding.

The Board <u>FINDS</u> that the Kinsley Landfill project must satisfy NJDEP requirements and <u>DIRECTS</u> Kinsley Landfill project developers to demonstrate to Staff that they have satisfied all NJDEP requirements for full certification. The Board <u>DIRECTS</u> Staff to issue full certification to the Kinsley Landfill project upon the applicant's demonstration that it has satisfied all requirements for full certification. Finally, and after it has received full certification and satisfied all SRP requirements, the Board <u>DIRECTS</u> Staff to issue a New Jersey Certification Number to the Kinsley Landfill project for purposes of SREC creation, provided that all requirements of <u>N.J.A.C.</u> 14:8-2.4 are met.

This Order shall take effect on December 28, 2013.

DATED:

12/18/13

**BOARD OF PUBLIC UTILITIES** 

**PRESIDENT** 

COMMISSIONER

/ COMMISSIONER

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COMMISSIONER

ATTEST:

KRISTI IZZO **SECRETARY** 

In the Matter of the Implementation of L. 2012, C. 24, The Solar Act of 2012; In the Matter of the Implementation of L. 2012, C. 24, N.J.S.A. 48:3-87(T) – A Proceeding to Establish a Program to Provide SRECs to Certified Brownfields, Historic Fill and Landfill Facilities; KDC Solar RTC, LLC Delilah Road Landfill; Public Service Electric and Gas Company Kinsley Road Landfill

Docket Nos. EO12090832V, EO12090862V, QO13111129 and QO13111111

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