TO: The Hon. Lee Solomon, President – New Jersey Board of Public Utilities
FR: John G. Puma – Senior Director Energy Management, Kamson Corporation
DATE: November 10, 2010
RE: Proposed NJ Clean Energy Program Budget and Program for 2011

I represent the Kamson Corporation based in Englewood Cliffs, NJ. We are a large real estate company that own, operate and manage 13,690 apartments in 79 developments in NJ, NY, PA and CT. The vast majority of our holdings are here in NJ where we have 9,810 units in 54 developments that are all market rate apartments. Our portfolio in NJ consists of nearly 1,000 apartments in hi-rise buildings and the rest - about 9,000 in Garden Style developments.

Kamson is a forward thinking green company and intends to go totally green in each of our developments. It's great for the environment, it's great for the economy and of course it enhances and modernizes our product for our resident – leaseholders.

We of course follow and work closely with the NJ Clean Energy Programs and Market Managers and use their guidelines in evaluating and upgrading our housing stock and seek to achieve the highest level of energy savings possible.

We also greatly contribute to the mandated SBC charges along with our resident-leaseholders in certain instances - the source of funds for the NJ Clean Energy Programs.

I am here today to support certain program changes in the Pay For Performance (P4P) program that will make the program more equitable and accessible to all SBC ratepayers.

This program strives to reduce energy consumption using a holistic approach to re-engineering the plant and facilities to achieve energy saving in excess of 25%. It is a well thought out and well managed program that does achieve excellent results.

Currently, the program excludes, "Market Rate Garden Style Apartments," while including structurally identical, "Affordable Rate Garden Style Apartments." This anomaly in the program prohibits us from participating and earning incentive rebates under this program. This distinction - creating housing classes is arbitrary and capricious and inhibits the essence of the program which is to support massive energy reduction - something we at Kamson strive for. In all fairness there is another program available to us - the Home Performance Program where the incentives are 90% less for certain energy conservation measures.

With regard to our Resident-Leaseholders who pay SBC charges as well-they are also ineligible to apply for and earn incentives since they are renters and not owners. The existing programs allow for folks who own their units (Condo's and Co-op's) that might live in structurally identical units to earn incentives but not leaseholders/renters.

THE KAMSON CORPORATION
REAL ESTATE • MANAGEMENT • INVESTMENTS
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Over the years we at Kamson and our Resident-Leaseholders have paid millions of dollars in SBC charges but we are by circumstance denied access to programs notwithstanding the fact that we will comply with the programs to reduce our energy consumption dramatically.

We addressed these inequities recently with the market managers in TRC and Honeywell the program administrators for NJ Clean Energy. These managers clearly understand these inequities and are working on ways to resolve these long standing issues. For the record we were well received by these groups and believe that they will put forth solutions in an effort to create a level playing field for all forms of housing and address this issue that made Renters and Market Rate Housing non-entities in these programs.

In the spirit of good faith we urge the BPU to remove these inequities and support any changes that the market managers put forth to create **a level playing field both for Market Rate Garden Style Apartments and our Resident-Leaseholders who are renters**. The simple solution is to create an all inclusive multi-family program.

We urge you to support our efforts as the benefits are many. On average Kamson will invest approximately $5,000 in energy upgrades per unit in our portfolio of nearly 10,000 units here in NJ. That's $50M in local commerce, lots of new jobs, lots of tax revenues and enormous energy savings.

Our energy models tell us that once these energy conservation measures are implemented across our portfolio here in NJ we will save 350 Therms and 1,750kWh per unit per year in perpetuity. All told that's 3.5M Therms and 16.75Gw's annually being removed from the grid forever. That's enough energy to power a small city here in the state.

We at Kamson intend to be a white paper case study illustrating the enormous benefits of the NJ Clean Energy program once these barriers are removed. Once Kamson is allowed in the P4P program with Garden Apartments - **it's a win-win for all**. Enormous energy savings, more comfortable and more efficient homes, tremendous financial savings, $50M in local commerce, increased tax revenues and many new jobs.

So I am here today to respectfully request your support in changing these inequities that inadvertently prohibit us from complying with these worthy programs. So in your review of the program for 2011 please initiate these changes and support any proposal that rectifies these issues. Please create a Pay For Performance program that embraces all multi-family housing throughout the state.

We look forward to placing all of our properties in the P4P program so that we can all reap the benefits. I thank you for allowing me the time to address the Board.

Respectfully Submitted,

John G. Puma
Senior Director Energy Management
JPUMA@Kamsoncorp.com
201-227-2288

MSEIA MID-ATLANTIC SOLAR ENERGY INDUSTRIES ASSOCIATION

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Dolores A. Phillips, MPH, Executive Director
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November 17, 2010

Ms. Kristi Izzo
Secretary
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ

Dear Ms. Izzo:

Please accept the following comments from the Mid-Atlantic Solar Energy Industries Association (MSEIA) in regard to the proposed 2011 Clean Energy budget.

MSEIA will also submit comments separately regarding the transitioning of the Clean Energy Program to a new structure. However, the two subjects are closely interrelated, so certain topics regarding the transition will be mentioned here.

MSEIA believes that the proposed 2011 budget effectively ends the long-standing support for the small business sector of the PV industry and for participation of the residential and small commercial/non-profit ratepayers.

In the rebate-driven incentive environment in previous years, careful choices were made to segment the incentives with attention to multiple public policy motivations. Among these motivations, small-business economic growth and job creation figured prominently. Explicit attention was also paid to the prospect for residential ratepayers (who pay over 38%-40% of the costs of renewable programs) and of small commercial/non-profit entities, to have at least the *opportunity* get a share of their money back by participating directly in the programs.

The conscious attention paid to these factors in the policy-making process paid off. The residential market sector occupied 22% of the market. Even though this market share is below the share of costs paid by that sector, and below the level in other large solar markets, it was regarded as a pretty good result by MSEIA. Hundreds of small businesses were created and grew in the state, creating thousands of high-quality New Jersey jobs. A whole new industry was created that today consists not only of solar installers and manufacturers, but also major New Jersey engineering firms, architectural firms, contractors, law firms, and financial companies & banks that are sustained by the solar market.

The NJCEP Transition Position Paper affirms the same motivations. Under "Section 4. Objectives", It lists six "Objectives to consider as a guide in the discussion regarding the future structure of the NJCEP and the overall transition". The first of these Objectives is "Advancing the Governor's goal of enhancing economic development and job creation". The sixth is "benefiting and supporting all ratepayer classes, directly or indirectly".

MSEIA recognizes the desire to transition away from rebate-based programs, and believes that it is possible to accomplish this without destroying the small business ecosystem that has grown, or abandoning the motivations mentioned above. Unfortunately, the SREC program is not ready to fulfill this function. Attempts to make it ready have been slow to materialize, and have run into opposition, particularly from the Office of the Rate Counsel. Therefore, MSEIA believes that if the Objectives discussed above are to be achieved, it will be necessary to ramp down the rebate program more slowly, while taking stronger action to modify the SREC structure to accommodate small solar systems.

It cannot be denied that small solar systems, those that serve the residential and small commercial/non-profit ratepayers, cost somewhat more than large commercial and utility-scale systems. If the economic development and job creation that attend these market segments is desired, and the participation of these rate classes is desired, then it is necessary to pay a little more for solar energy.

It is helpful to quantify these costs. In documents published by the Energy Master Plan group, the costs identified for SRECs amount to about 0.5% of a typical residential electric bill. If the SREC structure were to be designed to support small solar systems so that 15% of the market consisted of small systems, and those systems cost 15% more than large systems, it would increase the cost of SRECs by 2.25%. This would then amount to an increase of 0.01% in a typical residential bill, or about one and a half cents per month.

MSEIA believes that this is a small price to pay for the achievement of the objectives identified by the BPU, and that the BPU should take aggressive action to transition the SREC market structure to accommodate small systems.

Until SREC mechanisms are in place to support small systems, the rebate program should be funded at a level which allows the small system sectors to continue participating at a meaningful level. The current proposed budget of $3.8 million for rebates, and the $0.50 per watt level of rebates, constitute a drastic cut in support for small systems.

MSEIA believes that the budget for these incentives for 2011 must be at least tripled; that the rebate level should remain at $0.75 per watt; and that the incentives should cover programs other than the utility long-term contract program.

MSEIA also believes that the BPU, in its budget-making process, must adhere to the requirements of the EDECA law, Section 12. This means that <u>all</u> SBC funds must be devoted to the purposes specified in that section.

MSEIA also believes that if necessary, funds could be re-allocated from the proposed EDA programs to help support the small system incentives.

The Board and members of MSEIA thank the BPU for the opportunity to submit these comments.

Sincerely,

Lyle Rawlings

Lyle K. Rawlings, P.E.
President

Dennis Wilson
Vice-President, New Jersey

MSEIA ®
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MSEIA Comments on 2001 Renewable Energy Budget and Plans

September 16, 2010

MSEIA believes that the dramatic reduction in the solar rebate budget will have a drastic negative impact on the solar residential business sector, and on the number of jobs existing in that sector. This is largely due to the fact that there is not yet any other program in place to take the place of rebates and support this sector effectively. Secure and simple programs based on SRECs alone may be able to fill this gap, but such programs are not yet ready to fill the gap that will be left if rebates are phased out too quickly.

MSEIA understands why the BPU feels the need to phase out the New Jersey rebate program, but its successes should still be recognized. Not only was the program successful in creating very rapid growth in the solar market, but it was also managed carefully by the BPU, along with rich stakeholder input, to ensure diversity in business opportunity and diversity in ratepayer segments to be served. Since the BPU has been successful in managing the creation of a diverse ecosystem of businesses in New Jersey, MSEIA fervently hopes that it will not abandon this tradition now. The interests of our members in maintaining this diversity are obvious. Moreover, the interests of different rate classes – particularly the residential segment – should also be considered, and since the small system market is the primary driver of Jersey-based business growth and Jersey job creation, the broader interests of all residents of the state are also involved.

The $3.2 million in available rebates for the under 10KW segment, at $0.75 per watt, only funds 4.3 MW of solar projects, or about 4% of the solar market. This constitutes a dramatic drop from recent years of funding. This budget should be increased to at least $6.0 million, with funds from the energy efficiency budget or other renewables if necessary, to provide time for this market segment to transition to a point of no rebates (only when SREC programs that work for small systems are available in all areas of the state). This is evidently not the case in the service territories outside of the PSEG service area, as evidenced by the extraordinarily low participation by residential customers in the long term SREC contract solicitation process.

The REMI program should stay the same as it is presently structured for now. Few or no REMI rebates have been paid out to date, and thus there is little or no experience in administrative costs. Focus should be put on quickly qualifying those few in state solar manufacturers so the REMI program can produce some near term results.

CRS | center for resource solutions

November 17, 2010

To: New Jersey Board of Public Utilities
From: Center for Resource Solutions
RE: Comments on 2011 Budget for NJ Clean Power Choice Program

The Center for Resource Solutions welcomes this opportunity to comment on the proposed 2011 budget, which would zero-out funding for support of the New Jersey Clean Power Choice Program. CRS appreciates – but laments – the fact that the State, like many other jurisdictions, is facing difficult fiscal choices and feels that it will not be able to continue funding for verification and certification of the energy delivered through Clean Power Choice.

We note that the participating utilities appear to be willing to continue their commitment to support Administration & Program Development, as well as some Marketing and Call-Center functions. Our understanding is that the participating marketers in the program would be expected to shoulder more of the costs for marketing this program – and we certainly encourage their active involvement in promoting Clean Power Choice to a greater number of utility customers.

While it is expected that tracking and some form of verification of volumes may be handled by GATS, CRS would like to propose a solution to the potential certification gap that will provide customer assurances in a cost-effective manner.

CRS proposes that the State require the utilities/marketers to certify their renewable energy products through the Green-e Energy program, with the BPU and utilities adopting our criteria and National Standards as the basis for Green-e Energy certifying these transactions and conducting formal verification – as we already do for dozens of utility Green Pricing Programs nationally and for the majority of renewable energy deliveries in the voluntary marketplace.[1]

CRS, a 501 (c) (3) not-for-profit corporation registered in California, created and administers the Green-e Energy program. In 2004 CRS worked with the NJBPU as a technical consultant to help develop the NJ renewable energy standard and inform the creation of the Clean Power Choice program. CRS is very familiar with the goals and expectations for the program, and we believe that bringing Clean Power Choice into Green-e certification will save the state and participants money while increasing customers' interest in the program and ensuring their purchases meet the highest standards of quality assurance.

The current NJ Clean Power Choice marketers – Community Energy, Sterling Planet and Green Mountain Energy – all offer Green-e Energy certified products to their customers around the nation and are familiar with the standard and its requirements. They would simply register a new certified product to their Green-e accounts. Alternatively, CRS could take on verification of the program under existing criteria on a fee-for-service basis, but that would entail somewhat higher costs to develop the standard protocols to follow.

[1] Figures from the National Renewable Energy Laboratory indicate that Green-e certified more than 60 percent of the total voluntary market for renewable energy in 2009, the latest year for which figures are available.

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About Green-e Energy

Green-e Energy is the nation's leading voluntary certification program for renewable energy. For over a decade, Green-e Energy has been certifying renewable energy that meets environmental and consumer protection standards that it developed in conjunction with leading environmental, energy and policy organizations. Green-e Energy also requires that sellers of certified renewable energy disclose clear and useful information to potential customers, allowing consumers to make informed choices.

Green-e Energy requires organizations offering a certified renewable energy option to:

- Meet the requirements for renewable resources detailed in the Green-e Energy National Standard;
- Abide by a professional Code of Conduct that governs the marketing and business practices of the participating organizations;
- Follow the Green-e Energy Customer Disclosure Requirements, including the following:
  - Provide customer with a Product Content Label for the certified renewable energy option, which identifies the renewable resource type they supply (such as wind or solar) and the geographic location of the renewable energy generator, and
  - Provide customers with simple, clear Price, Terms and Conditions for the renewable energy option;
- Undergo an annual verification audit to ensure that they are buying enough of the right types of renewable energy to match their certified sales to customers;
- Complete a twice-annual review of marketing materials to ensure the organization is not making false or misleading statements about their certified renewable energy option(s) and is following the Green-e Energy Customer Disclosure Requirements;
- Pay an annual fee to cover the costs associated with certification.

The Green-e Energy National Standard was created through a public stakeholder process and is continually updated to evolve with the changing market. The latest changes to the Standard were put into effect as of July 15, 2010. Changes to certification policies are overseen by a Governance Board with members representing such organizations as the Natural Resources defense Council, Union of Concerned Scientists, National Renewable Energy Laboratory, Renewable Northwest Project and the Southern Alliance for Clean Energy, among others.

Green-e Energy is recommended as a high-quality standard by the U.S. Environmental Protection Agency, the World Resources Institute and the U.S. Green Building Council.

In 2009, Green-e certified over 18 million MWh of retail renewable energy transactions. This represents a 43% increase in total Green-e Energy retail sales volume over the previous year, purchased by over 545,000 residential and 37,000 commercial customers.

In contrast, the NJ CPC Program last year handled some 25,000 MWh of electricity for about 15,000 customers. Green-e Energy can easily accommodate this additional volume of accounts.

Green-e Energy currently certifies green power products offered by 219 electric utilities and distribution companies, 10 electricity service providers selling 14 different products in competitive markets, and 68 marketers selling certified renewable energy certificates (RECs).

The Green-e Energy program is national in scope, with 30 states that provide consumers with the ability to Green-e Energy certified renewable electricity options. Certified RECs are available in all states.

Utilities offering Green-e Energy certified renewable energy programs to their customers are among the top-ranked green pricing programs in terms of participation rates, numbers of customers and total volumes sold.

Sales in these markets are verified and audited annually, and CRS reports these results in the publicly available Green-e Verification Report. The Report for 2009 transactions, released in October 2010, is available at: *http://www.green-e.org/docs/2009%20Green-e%20Verification%20Report.pdf*

CRS has a wide range of data collection and reporting experience that applies directly to the type of reporting required by the NJ CPC program. Additionally, CRS has worked with over 100 organizations to promote and market their renewable energy offerings in accordance with the Green-e Energy Code of Conduct.

Although there are some current differences in eligibility criteria for the energy offered in New Jersey, we believe that a transition to incorporating these program offerings into the Green-e Energy certification would be relatively seamless, and would certainly provide NJ CPC customers with an outstanding level of consumer protection as a result of Green-e Energy involvement.

We would be happy to discuss this and provide any information needed to assist in ensuring a successful future for the New Jersey Clean Power Choice program, despite these proposed budget cuts.

Sincerely,

Arthur O'Donnell
Executive Director
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New Jersey Apartment Association
Home to New Jersey

TO:	The Hon. Lee Solomon, President – NJ Board of Public Utilities
FROM:	Conor Fennessy, Vice President of Government Affairs Nicholas Kikis, Director of Regulatory Affairs & Research
DATE:	November 10, 2010
RE:	**Proposed NJ Clean Energy Program Budget & Program for 2011**

On behalf of the New Jersey Apartment Association (NJAA), we appreciate the opportunity to provide stakeholder input in the NJ Clean Energy Program (NJCEP) for 2011.

One-third of New Jersey's working families, young couples and seniors call apartment living "home." Of the over 1 million rental units in the Garden State, over 500,000 of those are apartments located in larger, professionally managed properties of 5 units or more. The NJAA is the largest advocacy organization for professional multi-family rental housing providers in the state, and we represent owners and managers of over 165,000 apartment homes.

For professional rental housing providers, energy costs are of critical concern. After municipal property taxes and fees, property and casualty insurance, and a building's mortgage, energy is one of an owner's largest expenses – and one in which he has little control. **For buildings which are served by one, large "master" meter measuring bulk consumption by the entire building, when it comes to energy usage, owners and managers have little control over consumption or pricing.**

The power to conserve is ultimately in the hands of the resident, while the power to control utility prices is in the hands of the utility provider and the BPU.

What we **can** control is the equipment used and any time there are financial incentives available to help make long-term capital investment in new, higher efficiency equipment more attractive – and significantly reduce pay-back time – most responsible property owners will seize the opportunity by devoting the time and resources required to apply for financial support, and make the long-term investment required in new technologies.

Achieving greater energy efficiency in all multi-family buildings in New Jersey is an important goal and one that, with the Board's continued assistance, the multi-family rental housing sector is eager to achieve.

In a state and national economy which has shown occasional signs of rebounding, but continues to remain sluggish, financial incentives like those made through NJCEP represent critical seed money to help jump-start long-term investment to improve our housing stock.

In both single-family and multi-family sectors, New Jersey's housing stock is on average older than the national average. This makes addressing **energy efficiency issues in older buildings critical, yet more complicated than in new construction**.

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With new construction projects that are designed, approved and executed from "the ground up," the overall project can be tailored to accommodate new equipment designs, tolerances, and code-based requirements.

However, for multi-family renovation, rehabilitation or retro-fit projects, the planning dynamics and engineering are quite different, and housing providers are forced to work with a building that is of older architecture with significant limitations on space for new equipment installation. This requires that property owners, property managers, and regulators follow a **customized, building-by-building approach** as the only option when looking to make short and long-term investments in energy efficiency improvements in existing buildings.

Flexibility is the key. Flexibility from the Board in setting goals and targets to be reached in the advancement of greater energy efficiency. Flexibility for property owners and managers to use an array of equipment and installation options. Flexibility for market managers to work cooperatively with property owners in guiding owners to the program which best match their buildings and efforts to achieve greater energy efficiency.

The current program treats affordable/government subsidized multi-family rental housing differently than private capital/market-rate rental housing. **Moving forward we hope that the Board and market managers will revise the program criterion and seek a more level playing field for the entire multi-family industry.**

We greatly appreciated the opportunity to provide direct input to the market managers at both Honeywell and TRC. Our feedback and that of our NJAA member companies was welcomed. It is our hope that the input and expertise we provided to the managers will become part of the conversation on program reforms and revisions for 2011.

It was noted by the managers that the Board has referred to the multi-family sector as historically underserved, for a variety of reasons. The NJAA and our members are appreciate of the manager's acknowledgement and are eager to work with them and the Board to help correct this imbalance.

The NJAA is pleased to offer our continued support, expertise, and resources to President Solomon, Board members, Board professional staff, and our partners in the energy management field in collaborative efforts to advance energy efficiency and conservation. Achieving greater energy efficiency in all multi-family buildings is an important goal and one that multi-family rental housing sector is eager to attain.

We look forward to the next steps in this process.

The NJAA represents over 600 multi-family rental housing providers and affiliated businesses. We are a statewide organization dedicated to maintaining, improving and building new and affordable rental housing that serves hundreds of thousands of New Jersey's working families, young couples and seniors.

New Jersey Business & Industry Association

Celebrating a Century of Service to NJ Business

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Grassroots &
Transportation

Christine Stearns
Vice President
Health & Legal Affairs

November 17, 2010

TO: President Solomon, Commissioners Asselta, Fiordaliso, Fox and Randall

FR: Sara Bluhm, Assistant Vice President, Energy & Federal Affairs, NJBIA

RE: Clean Energy Draft Budget 2011

On behalf of the 22,000 members of the New Jersey Business & Industry Association (NJBIA), I appreciate the opportunity to share with you our comments on the Clean Energy proposed budget for 2011. The Commercial and Industrial Ratepayer has a very vested interest in the program and allocation of societal benefit charge (SBC) dollars.

We appreciate the understanding that New Jersey's business community is struggling with high energy costs and the recognition that at least 26 percent of the electric bill comes from state imposed policy which includes the SBC. NJBIA has heard from members coping during the recession and looking for ways to save money and remain competitive. For years, we have advocated for additional funding for commercial and industrial ratepayers but also witnessed as the business ratepayer has had requirements placed on companies that residential ratepayers are not subjected to like rebate limits and prevailing wage requirements.

Currently, the energy policy of the state is in flux. A reevaluation of the Energy Master Plan is ongoing; hundreds of millions of dollars were diverted because of excessive carry overs. The clean energy program may be transitioned to one of three options or remain the same. Utilities are filing for and executing competing programs that could have been handled by clean energy programs, laws are changing the potential landscape for energy supply and clean energy policy research is funded while program evaluation is left to the wayside and ratepayers are seeing increasing costs. Within this context, stakeholders have been asked to comment on the future of the clean energy program while the variables in the equation are unknown.

While there have been past fund management concerns, there still is a lack of evaluation which makes it difficult to plan for transition or continuation of the current program. Some of the fundamental questions that need to be answered are: What money is being collected from all sources for energy efficiency/conservation and renewables? What is being measured? What programs are effective and what may be a good intent but not a wise use of ratepayer money? What is being duplicated outside of the Clean Energy Program? What could be eliminated?

Within this context, the Association has been finding ways to add value to the current discussion at BPU but also the policy shift within Trenton. NJBIA has been working with the Christie Administration to promote the Business Action Center (BAC) which is to become the one stop center for business. To that end, we recommend that the Clean Energy Program (CEP) report regularly to the BAC the available rebates/incentives for business as well as any program changes. Previously it was the EDA that produced a comprehensive marketing piece that explained the BPU programs and what was available to commercial and industrial ratepayers. While BPU has tried to consolidate all CEP offerings into some promotional materials, there have not been materials specific to C&I covering all of the offerings that NJBIA is aware of.

NJBIA would also recommend the BPU continue to build upon the collaboration needed between BPU, DEP, EDA and BAC. Understanding that part of the reason for the board's move to Trenton is to help foster these partnerships, there is also an opportunity to work with programs such as the CAES Industrial Assessment Program that offers energy audits or the EDA low interest loans to help businesses achieve energy reductions. In the overall context of BAC, it would be helpful for a business to be able to apply for a CEP incentive, DEP permit, and EDA assistance all at once to encourage larger scale projects.

Additionally, it does not seem to NJBIA that there has been a concerted effort to promote the C&I programs as there continually is available money left over in many of these programs. Understanding that there is a lag time for larger projects such as Direct Install or Pay for Performance, compared to other programs such as Clean Power Choice there doesn't seem to be the same previous commitment to the marketing efforts. Within the trade association community, the market managers are missing out on the opportunity for dissemination of specific materials to the members. It is another avenue to help promote the programs especially if there is a program that is being underutilized.

Looking at ways to help underutilized programs, there seems to be a lack of review on a timely basis with an ability to refocus marketing efforts to spur interest in underperforming areas. This again is of concern since there are no present metrics for program evaluation to see where effective marketing could impact deployment. Or vice versa which programs are not an effective use of SBC dollars and should be discontinued due to their time consumption, resource intensity, complex regulations, etc. For example, the offshore wind money has been budgeted and carried forward for a number of years, while the state has been searching for money to assist the development of CHP. That $12 million could have been deployed for generation today that would help lower capacity costs for all ratepayers as well lower energy costs for commercial and industrial ratepayers.

Another area of concern is that $123,000 was expended on a business conference in 2010 but NJBIA is unaware of a conference occurring. Recognizing that previous conferences have cost tremendous resources in the past, we are not advocating for its return. However, there does seem to be an opportunity for the inclusion of webinars or some other type of learning/training to be available on the CEP website. Again over $100,000 was allocated to green jobs and building code training which was unspent in 2010. For 2011, a new line item of $500,000 is being allocated to Sustainable Jersey even though there is already $12 million allocated to a local government program with only $2million in commitments. NJBIA would ask 1) Why when we are spending millions on marketing and communications would there be a separate line item for a non-clean energy program? 2) Why wouldn't these efforts be folded into the existing local government program? 3) Would that money be better utilized for broad based marketing/communications such as the webinars?

In looking outside of the box, NJBIA recognizes that the board is trying to be innovative with the concept of a revolving loan fund. As we have participated in focus groups on this topic and provided additional information to the EDA, we do caution that since this is ratepayer money it should not be held to the same strict standards of regular EDA loans. There should not be a loan application fee but rather a flat administration fee should be determined and absorbed into the budget of clean energy dollars. Since this money already has regulatory hurdles attached to it such as prevailing wage, there should not be additional disincentives like hundreds of dollars to apply.

NJBIA agrees with the Ratepayer Advocate that there are problems within the OCE oversight budget when staff fails to evaluate programs and $1.5 million is left unused. When ratepayers are being assessed hundreds of millions of dollars and money is budgeted for evaluation and audits, but it does not occur, how is the budget supposed to be planned for the following year? It is also difficult to recommend what programs should be continued or expanded. Furthermore the Clean Energy Program has not had an annual report issued since 2008 so even the basic information is lacking in terms of overall spending and basic results such as energy savings, avoided emissions, etc.

NJBIA appreciates the opportunity to provide comments and looks forward to our continued partnership with the Board as it continues to improve its programs for ratepayers.

CADMUS-SOLAR

AS CERTAIN AS THE SUNRISE

September 7, 2010

To: The State of New Jersey Renewable Energy Committee and Board of Public Utilities

Re: 2011 Renewable Energy Budget and Plans :: REMI

We at Cadmus Solar would like to comment on the recent proposal by the BPU to eliminate the NJREMI Program. We believe this is extremely ill-advised and will work against the goals of bringing clean, well-paid manufacturing jobs back to New Jersey. We recommend, in fact, exactly the opposite; that New Jersey not only continue the program but dramatically increase the funding supporting it.

It is probably not news to anyone in New Jersey that our state is one in which it is both difficult and expensive to do business. We can attest to that from personal experience. But we do not ask you to take our anecdotal evidence as anything but one additional data point.

Instead, we would like point out some supporting data. In winter of 2007, the New Jersey Policy Research Organization Foundation conducted a research project to determine the business climate in the state of New Jersey. www.njprofoundation.org/pdf/njproffd071.pdf

It's findings paint a dismal picture. Some findings:

- The Small Business & Entrepreneurship Council ranks New Jersey's Policy Environment for Small Business 50th in the Nation in it's ***2006 Small Business Survival Index.*** According to the Index, NJ's policy environment for entrepreneurship and small business is the most stifling in the nation. Compared to every other state, NJ's policies in terms of taxes, regulation, spending and other governmental costs are at or near the bottom when it comes to promoting entrepreneurship and business growth.

- The conclusion of the summary of this report states: "Years of lackluster economic growth in New Jersey point to the State's poor business climate. New Jersey's economy, despite its high-income population, well-educated workforce and prime location, is now an economy at risk. Numerous national studies now rank New Jersey at or near the bottom of the 50 states in cost-of-doing business, business climate and tax competitiveness. These studies indicate that New Jersey's government policies towards business are having a profound affect on its ability to attract and retain business."

Some additional specifics:

- According to the New Jersey Business & Industry Association's 2007 Business Outlook Survey, only 17 percent of employers rated New Jersey as a "good" or "very good" place to expand their business facilities.
- The Tax Foundation's 2007 State Business Tax Climate Index (SBTCI) ranks New Jersey's business tax climate 48th in the nation. Only two other states—Ohio and Rhode Island—ranked worse than New Jersey in business tax competitiveness.
- New Jersey has one of the highest costs of health care in the nation. According to an annual study done by consultants Mercer Health and Benefits, "The per-worker cost for employers in the state was 17% higher than the national average.
- According to a recent Small Business Development Centers' report entitled ***A Strategic Blueprint for Small Business Growth: Strengthening Business Opportunities in New Jersey***, New Jersey's government invests far less
in small business assistance programs than competitor states. In the current budget (2007), for example, $800,000 of the State's $30.8 billion budget is allocated to small business assistance

programs. Pennsylvania invests a total of $8 million, 10 times the amount being invested in New Jersey's small business sector, despite the fact that Pennsylvania's budget is $4.7 billion less than New Jersey's. Governments in other competitor states also invest more than New Jersey in their small business assistance programs, including New York at $2.5 million, Georgia at over $2 million, and North Carolina at $1.7 million.

Is it any wonder that over 100,000 manufacturing jobs vanished from NJ between 2001 and 2005? Phillip Kirschner, President of the NJ Business and Industry Association says that for the past 30 years traditional manufacturers have been steadily going overseas, challenged by the high cost of doing business in New Jersey, specifically, energy, health insurance, labor, taxes, and fees. (re: energy www.bls.gov/ro2/avgengny.pdf).

Although much of this data is 3 years old, it was compiled ***prior*** to the current recession. Can anyone doubt that it is still applicable? In fact, CNBC rated New Jersey 44th out of 50 in the Cost of Doing Business and 35th out of 50 in the Business Friendliness categories in its "America's Top States for Business 2010" rankings.
(http://www.cnbc.com/id/37516039/)

To bring this back to how the NJREMI impacts Cadmus Solar, remember that we are NJ, USA manufacturers that provide a Fair Wage, a patent pending, innovative product, a high quality, clean manufacturing product line, we support the local economy and provide green collar job growth - instead of buying from
our largest competitors in this industry, the Chinese - a foreign gov't w/no governance and oversight in human rights, fair wages, working conditions, benefits, etc and ...as we have all seen no particular interest or assurances in product material certifications, quality control, or even safety.

Our products offer US installers, providers and utilities high performance, turn-key solutions that are complete kit, plug-n-play, bundled packages for fast, easy installs - less time installing means more managed risk and faster turnarounds resulting in better economics for all.

These American Made products satisfy the requirements for federally funded projects. benefit NJ EDA goals of overall economic development by growing green collar jobs and supporting NJ state businesses with more than 50% being local, preferred vendors.

If New Jersey truly wants to attract new manufacturers and the accompanying jobs to the state, it needs to do everything it can to help companies overcome an extremely difficult business environment. Until that environment changes, it is counterproductive to reduce or eliminate one of the truly valuable programs that can actually encourage job growth in the state. Help New Jersey companies compete effectively in today's globally competitive environment by aggressively funding the NJREMI program and streamlining the procedural hurdles preventing companies from accessing this money in a timely fashion.

678.361.7222 c

770.783.8070 f

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NJUA
NEW JERSEY UTILITIES ASSOCIATION

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November 17, 2010

Ms. Kristi Izzo
Secretary of the Board
State of New Jersey
Board of Public Utilities
Two Gateway Center, Suite 801
Newark, NJ 07102

Re: I/M/O COMPREHENSIVE ENERGY EFFICIENCY AND RENEWABLE ENERGY RESOURCE ANALYSIS FOR 2010-2011: 2011 PROGRAMS AND BUDGETS: COMPLIANCE FILINGS: TRANSITIONS WITHIN THE CLEAN ENERGY PROGRAM

BPU Docket No.: EO07030203

Dear Secretary Izzo,

On behalf of the seven investor-owned energy utility company members of the New Jersey Utilities Association (NJUA),[1] I am writing to provide input on the proposed 2011 budget for New Jersey's Clean Energy Program (NJCEP). As you know, NJUA provided a statement at the November 10th hearing that covered the NJCEP proposed budget and the preliminary paper on the transition of NJCEP. This letter only addresses the 2011 budget proposal as NJUA intends to file separate comments regarding the transition on November 26th. We appreciate the opportunity to provide input and continue to support the State's efforts to maximize limited resources while at the same time forging ahead to help consumers and businesses reduce their energy costs and advance New Jersey's economic development and environmental protection goals.

Each of the companies listed in this letter participated in the last revision of the Energy Master Plan ("EMP") and has a wealth of experience in delivering energy efficiency programs to their customers through various platforms, including direct program delivery, delivery through contractors and delivery via competitive procurement. These companies are still active participants in the NJCEP's Energy Efficiency and Renewable Energy Committees. Many are delivering supplemental energy efficiency, renewable energy and demand response programs or enhanced features of NJCEP programs, and some have experience delivering clean energy program solutions in other states.

As a result of our continuing involvement in the NJCEP committees, our specific input on the 2011 budget proposal will be brief. We are pleased to note that the proposed budget already reflects utility input as it was developed with broad stakeholder participation over the past few months. We believe

[1] The companies represented through this letter include Atlantic City Electric Company ("ACE"); Elizabethtown Gas Company ("E'town"); Jersey Central Power & Light Company ("JCP&L"); New Jersey Natural Gas Company ("NJNG"); Public Service Electric and Gas Company ("PSE&G"); South Jersey Gas Company ("SJG") and Rockland Electric Company ("RECO").

that the core of the budget reflects a balancing of competing priorities and limited funding. The reduction in administrative costs as a result of streamlining processes is clear evidence that there are opportunities to make the programs more cost effective with minor adjustments. Although NJUA is generally supportive of the budget as proposed, we would like to share the following concerns:

- Until 2007, many of the NJCEP programs were administered by the utilities. Importantly, when the decision was made to transfer those programs from the utilities to the State, it took more than three years to execute that transition. Managing the 2011 budget as proposed will require continuity beyond the proposed six month contract extension. In order to minimize market disruptions and customer confusion, we would encourage you to extend the Market Managers' contracts until the end of 2011. In so doing, you will allow for the EMP revision to be finalized and for the State's direction to be sufficiently clear to allow for reasonable transition planning. Moreover, establishing stability in the program structure should help all stakeholders and assist in effective longer range planning.

- To the extent that there is any additional funding available or the opportunity to shift funding, the Comfort Partners Program budget should be increased. The Comfort Partners Low Income Program has served over 55,000 households-helping them to make their energy bills more affordable and leading to significant savings on the amount of the participants' energy burden that is subsidized by all utility customers through the Universal Service Fund (USF) program. New Jersey's program has been recognized nationally for its success in delivering proven energy savings and continues to have broad-based support, as demonstrated by the specific references to its success by the Director of Rate Counsel, NJUA and other speakers during the November 10th public hearing. Comfort Partners is a perfect example of a successful societal benefits program as the implemented energy-efficiency measures lower long-term societal costs by reducing or potentially eliminating the subsidy that is provided by USF in future years for customers that participate in the program, thereby benefiting all energy customers.

- There is no money budgeted for 2011 for utility costs for Clean Power Choice, despite the fact that the utilities are continuing to run the program and included electronic data interchange ("EDI") costs in their compliance filing. The utilities expect to incur these costs, but the Board should know that without appropriate cost recovery the utilities will be unable to continue their involvement in the program. Accordingly, we would recommend that funding be made available to support the utilities' continued involvement in Clean Power Choice for 2011.

- New programs should be established on a pilot basis. The budget reflects a substantial allocation of funding for the development of new programs and/or approaches. In fact, more than 20% of the proposed NJCEP funding has been made available for new programs, including $30 million for a program that has not yet been fully developed as a concept. The Board has traditionally recognized the need to proceed cautiously with new approaches and frequently approves new utility programs or mechanisms as pilot programs in order to evaluate the results prior to expanding or adopting for a longer term and the commitment of significant resources. For example, we note that NJLEUC (New Jersey Large Energy Users Coalition) has recently submitted a proposal for a "Commercial and Industrial Self-Directed Investment Pilot Program." Although we are continuing to evaluate the merits of the proposal, we agree with NJLEUC's determination that it makes sense to initiate a pilot program before a more broad-based program is implemented. Accordingly, the Board may wish to consider utilizing a portion of the above-mentioned $30 million, essentially allocated to explore new program approaches, for the purposes sought by NJLEUC.

- New program approaches should also contain some basic, critical administrative elements, including measurement and verification. It is important to note that the delivery of programs always includes administrative costs irrespective of which entity or entities deliver them. With respect to the desire to test a new competitive solicitation process, it is critical to recognize that the process of measuring and verifying energy savings achieved is labor intensive for customized solutions and programs. The goal should be to optimize resources but with recognition that, by its very nature, the delivery of energy-efficiency initiatives with any form of societal subsidy requires significant resources to maximize the benefits for which customers will be asked to pay. Absent clear definition of alternative goals, metrics and reporting requirements for new programs, all new programs should comply with the same reporting requirements and undergo the same evaluation as existing programs to determine actual program impacts and identify lessons learned to ensure critical feedback to ongoing program design and delivery. Additionally, there of course needs to be identification of the funding source for new initiatives as well as the recovery period.

Please feel free to reach out to me to discuss any of the points addressed through this letter. On behalf of the NJUA energy member companies, we again thank you for the opportunity to provide input.

Sincerely,

Karen D. Alexander

Karen D. Alexander
President and Chief Executive Officer

Jersey Solar LLC

Solar Energy... It's a Natural.

November 17, 2010

COMMENTS ON 2011 NJCEP BUDGET AND PROGRAMS

We all need to take a step back and realize just how successful the NJCEP has been with respect to the number of residential and commercial solar photovoltaic systems installed over the last nine years. From an industry with only six photovoltaic systems installed in 2001, we will be nearing the 10,000 systems milestone by the end of 2010. NJ's market is second only to California in the total number of solar installations. The systems have ranged in size from small 2 kW residential installations to large public and private commercial jobs to multi-megawatt utility-scale solar installations. The NJBPU has provided incentives in the form of cash rebates and other market-based incentives (SRECs) both to jump-start the utilization of NJ's solar resources, meet the goals of the EMP and the NJRPS, and to continue to support the industry subsequently created. NJ citizens and ratepayers have benefited environmentally by the introduction of clean electricity into the utility grid and economically as well, saving money on electricity costs and creating thousands of well-paid jobs in solar and related industries. Currently, it is one of the bright spots in the New Jersey economy.

The proposed 2011 NJCEP budget dedicated to support solar incentives has been reduced to $ 3.2 M., which translates into a $0.50-.075 rebate for residential and small, non-profit commercial systems. We feel these limited funds would be better spent with a subsidized-interest loan program. Interest-rate buydowns of up to ½ of the current interest rate would be simple to administer, with a single transaction when the loan closes, which would be upon completion of the system and township and utlity interconnection approvals. The customer would arrange for financing through their own bank. On the other hand, a revolving loan program would incur more administrative expense to approve, collect, and disburse funding on an ongoing basis. We feel that small private banks could complete these administrative tasks in the normal day-to- day service of providing loans. With a 2011 budget of $ 5M, these interest-rate buydowns would result in over $ 100M of new business, creating additional jobs and revenue for NJ in the way of tax receipts. This could be accomplished with what works out to be about $ 0.38/watt , a savings over the current rebate level of $ 0.75/watt.

408 Lambertville-Hopewell Road • Lambertville, NJ 08530
609.466.8040 • Fax 609.466.8362 • www.jerseysolar.com
Solar Installers Since 1976 • T/A Jersey Solar Electric • New Jersey Electrical Contractor Business Permit No. 5395A

Just as importantly, a loan program would signal a move away from cash rebates which have been in effect since 2001, and towards a new approach. Looking back to 2001 and the beginning of the NJCEP , the solar industry would never have believed that rebates for small systems would have lasted for almost ten years. The industry indicated that rebates would only be necessary for six or seven years, and elimination of rebates by its very nature signals a successful NJ solar energy program. We think the industry is ready to move beyond rebates for small systems , because the economic benefits of going solar are still strong due to other existing incentives, such as NJ's performance and market- based SREC Program, the EDC SREC-Financing and PSEG Solar Loan Programs, the Federal tax incentives, and utility savings derived from some of the nation's highest electricity rates. The cost of solar has also come down dramatically, with system pricing being reduced by 30% over the last couple of years due to increased competition in the manufacturing and solar industry. The cost of solar has decreased to such an extent that small residential and commercial systems have a return of original investment in about six years- without rebates, and with an average SREC price of $ 475.

There are several ways that a low-interest loan program would be structured within the NJCEP. One idea is to make the loan program available as an incentive to those customers willing to enter into long term SREC contracts with the JCPL's and ACE's SREC-Financing Program. This loan approach would complement this existing EDC program, as commercial bank loan repayments are made from revenue received from the sale of SRECs over a ten year period, with SREC prices guaranteed by the EDC long term contracts. It is unclear how the NJCEP subsidized loan program would dovetail with the PSEG Loan Program.

Another idea is to offer small residential and commercial systems the choice of a rebate or low-interest loan, but not both. This approach would allow for a transition away from rebates while offering a financing alternative which many customers would opt for, depending on their circumstances. It is also important to consider that when cash rebates are made available for New Jersey-based systems, less is coming into New Jersey in the way of Federal tax incentives because of the reduced basis of cost.

We recommend that the NJBPU continue Honeywell's contract until at least the end of 2011. Since there were about 1200 rebated solar photovoltaic systems approved under the 2010 Funding Cycle # 3, ending in November, 2010, there will be an on-going need to administer these rebate approvals, inspections, GATS certification numbers, etc. Honeywell has all the supporting documentation in-hand, and transferring this information to another agency or administrator would be very difficult to achieve effectively. There are some remaining CORE and REIP rebate- approved systems which need to be completed and administered, and Honeywell has all the records. So much would be lost in the transfer of records as to make a change in administrator in 2011 impractical.

However, there are improvements which could result in lower NJCEP administrative costs in 2011, such as on-line forms and submittals. The SREC Registration Program (SRP) could also realize administrative savings, with on-line forms and EDCs certifying solar installations with GATS upon receiving the Municipal Certificate of Approval and officially interconnecting the project. Honeywell's Quality Assurance Program has effectively reduced inspection and reporting expense. Also, as we move beyond rebates to 100% market and performance- based incentives , the need for administrative services hosted by the NJCEP will decline markedly.

From: Boylan, Rachel [Rachel.Boylan@bpu.state.nj.us]
Sent: Tuesday, November 16, 2010 2:35 PM
To: Mike Ambrosio
Subject: RE: Budget?

Sorry – this time I included the signature block

The program has been a disaster for everyone involved from the beginning. So much of the money that could go to the actual energy reductions (insulation, etc.) is waisted on paper pushing jobs that it is a joke. For every job that was created to push paper, I bet a job like my own who was doing energy audits was lost.
The solution is simple:

Make all contractors be licensed just like home inspectors are.
Once they are licensed, the work they do on homes is eligable for a tax break.
Every job that is done by a licensed contractor is checked by a state inspector just like people when they take out permits to add a deck on their home.
Fire all the paper pushers.

This way there would be so much money left over for the actual work that all of the over taxed NJ home owners would feel like they are finally getting something for their money due to the large tax breaks they would get since the money will no longer be waisted and the work would get done right since it is checked by state inspectors.

--
Sincerely,
Craig Lynch
Inspector
Complete Home Inspection Inc.

-----Original Message-----
From: Mike Ambrosio [mailto:mambrosio@appliedenergygroup.com]
Sent: Tuesday, November 16, 2010 2:29 PM
To: Boylan, Rachel
Subject: RE: Budget?

Any idea who it is from?

Mike Ambrosio
Vice President
Applied Energy Group, Inc.
317 George Street, Suite 400, New Brunswick, NJ 08901
Tel (732) 246-5700 • *Fax* (732) 246-5775 • www.AppliedEnergyGroup.com

---

From: Boylan, Rachel [mailto:Rachel.Boylan@bpu.state.nj.us]
Sent: Tuesday, November 16, 2010 2:22 PM

To: Mike Ambrosio
Cc: Cynthia Holland
Subject: Budget?

The email below does not specifically reference the budget but may well have been inspired by the request for comments. Once again – erring on the side of inclusion.

The program has been a disaster for everyone involved from the beginning. So much of the money that could go to the actual energy reductions (insulation, etc.) is waisted on paper pushing jobs that it is a joke. For every job that was created to push paper, I bet a job like my own who was doing energy audits was lost.
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This way there would be so much money left over for the actual work that all of the over taxed NJ home owners would feel like they are finally getting something for their money due to the large tax breaks they would get since the money will no longer be waisted and the work would get done right since it is checked by state inspectors.

From: Winka, Michael [Michael.Winka@bpu.state.nj.us]
Sent: Monday, November 22, 2010 4:57 PM
To: Sjmca1@aol.com; OCE
Cc: ae.construction@comcast.net; Mona Mosser; Hunter, Benjamin; Mike Ambrosio; Boylan, Rachel
Subject: RE: comments

Michael Winka

Michael Winka
Director Office of Clean Energy NJBPU
POB 350 - 44 S Clinton Ave
Trenton, NJ 08625-0350

609 777 3335 Trenton
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Michael.Winka@bpu.state.nj.us
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1-866 nj smart (for information on NJCEP)
↺↓⇨↑⇨⇨↙ ↓↔↗⇨

-----Original Message-----
From: Sjmca1@aol.com [mailto:Sjmca1@aol.com]
Sent: Wednesday, November 17, 2010 12:37 PM
To: OCE
Cc: ae.construction@comcast.net
Subject: comments

I believe that the comments made by Greg Fontaine have merit and should be considered and addressed.
Six contractors from SJMCA were initially interested and participated in the training to become certified contractors. Their initial enthusiasm was dampened by some of the issues raised by Mr. Fontaine.
I would suggest that a small group of like minded contractors discuss these issues and offer solutions to improve the program.

My observation has witnessed a very responsive well intentioned group of individuals from the BPU to the staff at the BPU, TRC and Honeywell that cares tremendously for what they have set out to accomplish.

A little tweaking would only make the program better.
Sincerely,
John J. Connors
Executive Director
South Jersey Mechanical Contractors Association

Kate Morecraft

From: Ellman Susan [SEllman@NJNG.com]
Sent: Friday, September 17, 2010 8:20 AM
To: Kliemisch, Roger (Woodbridge,NJ-US)
Cc: Deluca, Brian (Woodbridge,NJ-US); Kirsch, David (Woodbridge,NJ-US); Firari, Fairlie (Ithaca,NY-US)
Subject: RE: Funding Statement

Thanks to all!

From: Kliemisch, Roger (Woodbridge,NJ-US) [mailto:RKliemisch@trcsolutions.com]
Sent: Friday, September 17, 2010 8:11 AM
To: Ellman Susan
Cc: Deluca, Brian (Woodbridge,NJ-US); Kirsch, David (Woodbridge,NJ-US); Firari, Fairlie (Ithaca,NY-US)
Subject: RE: Funding Statement

I added a few words and feel that it will work.
Dave, I am good with it.

From: Ellman Susan [mailto:SEllman@NJNG.com]
Sent: Friday, September 17, 2010 7:45 AM
To: Kliemisch, Roger (Woodbridge,NJ-US)
Subject: FW: Funding Statement

Roger see below. I'm sure Dave will respond however I need to get back to corp. comm. this morning. Thanks in advance.

From: Ellman Susan
Sent: Thursday, September 16, 2010 4:47 PM
To: 'dkirsch@trcsolutions.com'
Subject: Funding Statement

Dave

We're going to be handing out the packets to the municipalities next week and are in the process of printing a statement on the outside of the envelope to catch the attention of the recipients. Would it be a legal, fair, okay to say:

Up to $50,000 worth of Eligible Energy Efficiency Upgrades for Free- No Matching Funds Required

Must Apply by December 31, 2010

Best,

Susan Ellman
Energy Efficiency Marketing Manager
New Jersey Natural Gas
1415 Wyckoff Road
Wall, NJ 07719

Phone: 732.378.4924
Cell: 732.272.5820

Kate Morecraft

From: Chantal.Greffer@woodbridge.k12.nj.us
Sent: Thursday, September 16, 2010 3:57 PM
To: Deluca, Brian (Woodbridge,NJ-US)
Subject: re: Green Schools Program

Dear Mr. Deluca,

Based upon my experience this past school year with the Green Schools Program, I wholeheartedly recommend that the funding for this program continue. The equipment that was shared among the participating schools was extremely helpful. My only disappointment was the lack of feedback from the company that was tracking our energy usage. I hope that this information was helpful to you in making your decision.

Sincerely,
Chantal Greffer

From: Boylan, Rachel [Rachel.Boylan@bpu.state.nj.us]
Sent: Monday, November 15, 2010 4:45 PM
To: Mike Ambrosio
Cc: Cynthia Holland

- from jeanpublic@yahoo.com in OCE inbox

i do not want solar panels put on farmland that should be used for farmland. i do not want that allowed. i do not then think that such farmland that is used for solar panels should still be called a "farm" and farm assessment. it is clear that energy production from solar is a BUSINESS AND SHOULD BE FULLY TAXED AS A BUSINESS.

THERE IS ALOT OF FUZZY THINKING GOING ON RIGHT NOW. I FAVOR SOLAR AND WIND AND GEOTHERMAL, BUT IT IS CLEAR WE MUST MAKE THINGS RIGHT.

GOOD FARMLAND SHOULD STAY GOOD FARMLAND. IT SHOULD NOT BE PLOWED UNDER SOLAR PANELS. SOLAR PANELS CAN BE PUT ON TOPS OF COMMERCIAL BUILDINGS, ON TOPS OF CONTAMINATED LANDFILLS, ETC. THIS IS MY COMMENT FOR THE PUBLIC RECORD.

B. SACHAU 15 ELM ST FLORHAM PARK NJ07392