

November 4, 2025

Honorable Sherri L. Lewis
Secretary of the Board
State of New Jersey
Board of Public Utilities
44 South Clinton Avenue
Trenton, New Jersey 08625-0350

Re: N.J.A.C. 14:8-5.2(l), 14:8-5.6(a), and 14.8-5.12(a)
Compliance Submission
BPU Docket No. _____

Dear Secretary Lewis:

Rockland Electric Company (“RECO” or the “Company”) hereby submits for filing the compliance requirements set forth at 57 N.J.R. 1420(b) related to the Grid Modernization rules. Those rules specifically require that the New Jersey Electric Distribution Company’s (“EDCs”) take the following actions by November 4, 2025:

- (1) Adopt a common set of Level 3 Interconnection Review Screens (N.J.A.C. 14:8-5-6(a));
- (2) Submit a compliance filing to allow existing customer-generator facilities to add an energy storage device and/or upgrade to UL 1741-compliant smart inverter without additional study through the appropriate interconnection process on all circuits that can host greater distributed energy storage capacity (N.J.A.C. 14:8-5.2(l)); and
- (3) Make a tariff compliance filing to implement a standard dispute resolution process to govern disputes between the EDC and a customer-generator (N.J.A.C. 14:8-5.12(a)).

The Company details below how it met the actions laid out in 57 N.J.R. 1420(b).

Level 3 Interconnection Review

N.J.A.C. 14:8-5.6(a) provides

“by November 4, 2025, each EDC shall adopt a common set of level 3 interconnection review screens. An EDC shall use the level 3 review screens for applications to connect customer-generator facilities that:

- (1) (Reserved)
- (2) Do not qualify for either the level 1 or level 2 interconnection review procedures; or

- (3) Did not pass the level 1 or level 2 interconnection review procedures set forth at N.J.A.C. 14:8-5.4 and 5.5.”

RECO represents that it will adopt a common set of Level 3 Interconnection Review Screens.

Compliance Filing for Energy Storage and Smart Inverter Upgrades

N.J.A.C. 14:8-5.6(a) requires that by November 4, 2025, each EDC shall make a compliance filing to allow existing customer-generator facilities to add, on all circuits that can host greater distributed energy storage capacity, an energy storage device and/or upgrade to a UL 1741-compliant smart inverter through the appropriate interconnection process.

Each EDC has the technical responsibility to determine whether a circuit can host greater capacity. Some level of engineering review must occur to address issues such as inadvertent export, fault current, and operational safety, and to ensure that the proposed interconnection will not adversely impact the system’s safety and reliability.

RECO confirms that the addition of energy storage behind a current point of interconnection and/or the upgrade to a UL 1741-compliant smart inverter will require no excess study above and beyond the technical responsibility of the Company.

Dispute Resolution Process

N.J.A.C. 14:8-5.12(a) provides by November 4, 2025, each EDC shall make a tariff filing to implement a standardized dispute resolution process to govern disputes between the EDC and a customer-generator as set forth in the rule. As required by N.J.A.C. 14:8-5.2(l), as part of the dispute resolution process, each EDC is to identify an ombudsman to handle customer interconnection complaints. RECO has designated an ombudsman and the information has been added to the Company’s website.

The Company includes as Appendix A draft tariff leaves in redline format its proposed tariff language related to the dispute resolution process.

Conclusion

Please note that the Company is making this filing solely in electronic form pursuant to the Board’s directive in its Emergency Order dated March 19, 2020 in BPU Docket No. EO20030254.¹

Thank you for your assistance with this matter.

Sincerely,

/s/ Grace Su

Associate General Counsel

¹ I/M/O The New Jersey Board of Public Utilities Response to the Covid-19 Pandemic for a Temporary Waiver of Requirements for Non-essential Obligations.

DRAFT

Revised Leaf No. 68
Superseding Original Leaf No. 68

GENERAL INFORMATION
SERVICE CLASSIFICATION RIDER (Continued)

NET METERING AND INTERCONNECTION STANDARDS FOR CLASS I RENEWABLE ENERGY SYSTEMS (Continued)

Metering and Billing (Continued)

(2) (Continued)

When a Customer-generator switches electric suppliers, the electric power supplier or basic generation service provider with whom service is terminating shall treat the end of the service period as if it were the end of the Annualized Period.

The selection of the Annualized Period of a Customer-generator shall be in accordance with the terms and conditions set forth in N.J.A.C. 14:8-4.

Aggregated Net Metering

(1) Aggregated net metering shall be permitted in accordance with the terms and conditions set forth in N.J.A.C. 14:8-7.

Interconnection Standards

(1) Customer-generators shall comply with the Company's Interconnection Standards, and meet all applicable safety and power quality standards approved by the National Electrical Code, Institute of Electrical and Electronics Engineers, and accredited testing institutions, such as Underwriters Laboratories. All Customer-generator facilities shall also comply with all other requirements in N.J.A.C. 14:8-5.

(2) The Company may not require an eligible Customer-generator whose system(s) meets the standards above to install additional controls, perform or pay for additional tests or purchase additional liability insurance.

Dispute Resolution Process

The following process will govern interconnection-related dispute(s) between the Company and an eligible Customer-generator, including, but not limited to, disputes involving issues with interconnection studies, cost estimates for necessary upgrades, queue priority, the development of the interconnection agreement, billing, fees, or any related matters.

(a) An eligible Customer-generator may initiate the informal dispute resolution process by making a request through the Company's portal or to the Company's interconnection ombudsman (as identified on the Company's website), and the Company may initiate the process by notifying an eligible Customer-generator through the Company's portal and by sending a written message to the eligible Customer-generator's email address. The parties shall make good faith efforts to resolve any dispute, including by making subject matter

ISSUED:

EFFECTIVE:

ISSUED BY: Michele O'Connell, President
Mahwah, New Jersey 07430

DRAFT

Revised Leaf No. 69
Superseding Original Leaf No. 69

GENERAL INFORMATION
SERVICE CLASSIFICATION RIDER (Continued)

NET METERING AND INTERCONNECTION STANDARDS FOR CLASS I RENEWABLE ENERGY SYSTEMS (Continued)

Dispute Resolution Process (Continued)

(a) (Continued)

experts available, within ten business days of its initiation or such longer time as the parties agree to in writing.

(b) If the informal dispute resolution process is unsuccessful, the eligible Customer-generator shall provide the Company with a written notice of dispute, setting forth the nature of the dispute, the relevant known facts pertaining to the dispute, and the relief sought. The eligible Customer-generator shall submit the notice through the Company's portal or send it by email to the Company and the Board's interconnection ombudsman.

(c) The Company shall acknowledge the notice within three business days of its receipt and identify a representative with the authority to make decisions for the Company with respect to the dispute.

(d) The Company shall provide the eligible Customer-generator with all relevant regulatory and/or technical details and analysis regarding any Company interconnection notice of dispute. Within 20 business days of the date of the notice of dispute, the parties' authorized representatives shall meet and confer to try to resolve the dispute.

(e) If the parties do not resolve their dispute within 30 business days of the date the eligible Customer-generator sent the notice of dispute, then:

1. Either party may request to continue negotiations for an additional 20 business days;
2. The parties by mutual agreement may refer the dispute to the Board's interconnection ombudsman; or
3. The parties may request mediation from an outside third-party mediator by mutual agreement, with costs to be shared equally between the parties.

(f) If the parties still do not reach an agreement after attempting to resolve their dispute by one or more of the methods listed in (e) above, then the eligible Customer-generator may proceed to the Board's formal complaint resolution process by filing a petition with the Board pursuant to N.J.A.C. 14:1-5.

(g) At any time, either party may file a complaint with the Board pursuant to its rules or exercise whatever rights and remedies it may have at equity or law.

ISSUED:

EFFECTIVE:

ISSUED BY: Michele O'Connell, President
Mahwah, New Jersey 07430

DRAFT

Revised Leaf No. 70
Superseding Original Leaf No. 70

GENERAL INFORMATION
SERVICE CLASSIFICATION RIDER (Continued)

NET METERING AND INTERCONNECTION STANDARDS FOR CLASS I RENEWABLE ENERGY SYSTEMS (Continued)

~~This leaf intentionally left blank.~~

Reporting

The Company and Electric Generation Suppliers providing Competitive Energy Supply to the Company's customers shall each submit two net metering and two interconnection reports per year, one covering January 1 through June 30 and one covering July 1 through December 31. These reports shall be submitted by August 1 and February 1, respectively.

The net metering report shall include the following information during the reporting period:

1. The estimated total kilowatt hours supplied to the distribution system by Customer-generators and a description of the estimation methodology used;
2. The estimated total kilowatt hours that were delivered to Customer-generators through the distribution system;
3. The total number of Customer-generators that were paid for excess generation at the end of the Customer-generators' annualized periods; and
4. The total dollar amount that the Company paid to Customer-generators for excess generation at the end of the Customer-generators annualized periods, separated by month.

The interconnection report shall include the following information regarding Customer-generator facilities that interconnected with the distribution system for the first time during the reporting period, listed by type of renewable energy technology:

1. The number of Customer-generators that interconnected;
2. The estimated total rated generating capacity of all Customer-generator facilities that interconnected; and
3. The total cumulative number of Customer-generators that interconnected between June 15, 2001 and the end of the reporting period, including the Customer-generators in 1 above.

ISSUED:

EFFECTIVE:

ISSUED BY: Michele O'Connell, President
Mahwah, New Jersey 07430