



**Comments of the New Jersey Solar Energy Coalition
Universal Service Fund and Fresh Start Program
Docket No. AO20060471
May 5, 2023.**

The New Jersey Solar Energy Coalition appreciates the opportunity to provide written comments in response to the request for information (RFI) associated with the Universal Service Fund. The New Jersey Solar Energy Coalition continues to be an active participant in the development of associated solar energy policies, including participation in all of the stakeholder working groups hosted by the Board of Public Utilities staff.

New Jersey Solar Energy Coalition is a broad coalition comprised of New Jersey solar developers active in all market segments, solar financing functions, engineering, accounting, legal, and renewable energy credit trading firms employing thousands throughout New Jersey.

USF - Community Solar Eligibility Conflict

The community solar permanent program is now in the final stages of accepting stakeholder comments in Docket No. QO22030153, by May 15th, 2023. As we have also observed in these comments there exists a potential eligibility conflict between these two important low income programs. The Universal Service Fund maintains an affordability threshold of 2% of annual income for gas and non-heating electric costs, and 4% of annual income for electric heating costs.

However, if a low income USF customer also joins a community solar program the community solar discount applied from that program could result in the customer losing USF eligibility as the community solar applied discount could then reduce costs below the USF income threshold.

This issue has been raised by a number of LMI customers during community solar subscriber outreach meetings and negatively impacted community solar solicitations. While it is unlikely that this circumstance will impact a great number of LMI community solar customers, these potential eligibility concerns have created program confusion and become a significant obstacle to community solar subscriber solicitations.

We would ask, therefore, that the board consider amending the USF income eligibility requirements such that any community solar discount not be included in the income calculation for USF eligibility.

Clearly, it is important that low income programs be easily understood, coordinated, and complimentary to one another in achieving the desired outcome. Our recommendation would eliminate program eligibility confusion and help the community solar program achieve the potential the Murphy administration and board have for this important program.

Respectfully submitted,

A handwritten signature in black ink that reads "Fred DeSanti". The signature is written in a cursive, slightly slanted style.

**Fred DeSanti, P.E.
Executive Director, New Jersey Solar Energy Coalition**

