

Community Solar Statement for NAACP NJ State Conference

New Jersey Community Solar Energy Pilot Program
BPU Docket No. QO18060646

Comments of NAACP in response to the BPU Notice of July 9, 2020

The NAACP NJ State Conference appreciates the opportunity to provide the following comments in response to the Board of Public Utilities (BPU) notice of July 9, in furtherance of the efforts of the BPU and Governor to expand their commitment to environmental justice in the context of Community Solar.

Since New Jersey rolled out its pro-solar growth policies over the course of the last 15 years, people of limited means, living in apartments or not owning their own property, have been largely shut out from these benefits.

The BPU, in consideration of both the COVID crisis and the national racial justice protests, has made reaching low and moderate income customers in environmental justice communities a priority across the board. I congratulate the Board of Public Utilities in making Community Solar for low and moderate income customers a policy priority.

To reach this goal, the BPU must first acknowledge that to truly address environmental justice they must re-adjust their thinking as to the inherent biases that programs such as Community Solar have built into their structure.

Community Solar needs to be aligned to work for individual low-income customers who struggle to meet their basic needs and stay within budget. The design at its core must recognize that these customers are not looking for or putting the time and effort into shopping for a green energy product. There are community solar programs around the country that are aimed at those, typically affluent, environmentalist customers who are willing to go out of their way to sign up for the community solar, but this is not the people this program must reach.

These customers have more pressing matters than to research Community Solar, then review an unreasonable amount of paperwork to join. This is why to reach the communities who are most in need of financial relief, the BPU should allow towns to use the opt-out mechanism to subscribe customers.

Opt-out is already a proven and Board-approved mechanism. The BPU has already seen success in using the Opt-Out method in Government Energy Aggregation Programs across the State. If the built-in protections used for Government Energy Aggregation are sufficient to enroll an entire town, then it stands to reason the same mechanism would and should be just as easily applied to the much smaller Community Solar Program. At the end of the day, opt out is needed to truly have widespread mass market success in the enrollment of LMI customers.

A second area of importance is billing. The utilities already include the charges levied by default suppliers in their bills. The BPU should have the utilities provide the same billing and revenue collection for LMI community solar. The confusion of two bills is avoided and customer revenue is covered. Community solar for individually metered LMI customers can then be financeable and developed.

Creating an equitable Community Solar Program is within your reach. We look forward to working with you to make New Jersey a national leader in delivering community solar to all types of customers. With the cooperation and understanding of the BPU, our environmental justice communities may finally breathe easy.