

# **Princeton Community Housing**

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August 7, 2020

Ms. Aida Camacho-Welch, Secretary of the Board  
Board of Public Utilities  
44 So. Clinton Ave., 7th Floor  
Trenton, NJ 08625

Re: New Jersey Community Solar Energy Pilot Program  
BPU Docket No. QO18060646  
Comments from Princeton Community Housing,  
in response to the BPU Notice of July 9, 2020

Dear Secretary Camacho-Welch:

We appreciate the opportunity to answer Question 2(c) under Topic 1: Equity and the Inclusion of Low- and Moderate-Income (LMI) Households.

Princeton Community Housing is motivated to comment on this issue due to our responsibility to speak up for the LMI residents of Princeton. Desiring to support a balance of housing opportunities essential to the continued success and diversity of the Princeton community, a small group of community leaders formed Princeton Community Housing, Inc. (PCH) in 1967. Over 53 years later, PCH has grown to become the largest single provider of affordable housing in Princeton. In consideration of the LMI community, PCH submits the following comments aimed at expanding the Community Solar Project to all LMI customers in a well-rounded and fair manner.

*Question 2(c): What would be the advantages and risks of implementing opt-out for community solar? Is an opt-out model the best approach to facilitating low- and moderate-income subscriber enrollment?*

PCH believes the opt-out model is a highly efficient and fair way to sign up individually metered LMI customer accounts. The excessive, unnecessary, and costly labor and effort of collecting individual wet signatures or electric sign-ups under the opt-in approach of each individually metered LMI subscriber will prevent the Program from successfully reaching LMI customers.

The opt-out method has also been market tested by the BPU numerous times in its Government Energy Aggregation (GEA) Program and has proven to be highly successful. Along with the opt-out protections established in GEA rules, the Program will be municipally operated and customer centered, thus fully protecting LMI residents.

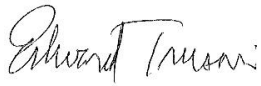
Finally, the Community Solar Program is in a Pilot stage. Therefore, it is appropriate to allow the use the opt-out approach in the interest of investigating how New Jersey can develop a highly successful program design to reach the greatest amount of LMI customers in subsequent Pilot

stages or in the permanent program. Accordingly, the BPU should permit waivers from its rule to allow opt-out in its Round 2 Application Process.

PCH chooses to stand up for the interests of the LMI community on this issue because providing the full benefits of solar energy to as many LMI customers as possible should be the primary focus of the Community Solar Pilot Program, and to do so the above suggestions should be implemented.

Thank you again for this opportunity and also for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward Truscelli".

Edward Truscelli  
Executive Director