



NEW JERSEY CHAPTER

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www.SierraClub.org/NJ

Ada Camacho, Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Ave
Trenton, NJ 08625

August 3, 2020

Re: Community Solar PY1 Comments

Dear Ms. Camacho,

The Sierra Club supports New Jersey's Community Solar Energy Pilot Program and offers our comments and suggestions. The pilot program was very successful, with over 250 applications. What's even better is that almost all of these applications were for low- and moderate-income projects. This is an important way to bring solar to more people across the state, especially to those who couldn't do it on their own.

Solar belongs to everyone in New Jersey, but for far too long there's been an inequity where solar has been more available for wealthier communities and households. Community Solar is important because it helps bring clean renewable energy to people who would not be able to have solar on their homes or could not afford solar. Now that we've seen how successful the pilot program was, we believe that it should be expanded into a permanent program. We also need to expand the amount of solar available, so that we're not cutting into the amount of available solar. We need to expand our solar program to at least 600 MW a year so that we can reach our clean energy goals of 100% renewable and zero-carbon by 2050.

For far too long, solar power has only been available to wealthier communities. This program is critical because it makes solar more accessible to low- and moderate-income communities. We'd like to see even more targeted to these communities so they can benefit. Improving solar energy in the state would make our environment cleaner, fight climate change, and increase green jobs. New Jersey can be a leader nationally in clean energy and clean energy jobs.

Considering the success of the pilot program, we would like to see it expanded. A project of 5 MW only powers a little over 800 homes. We should allow for projects that are 10 MW or greater, even up to 20 MW. This would allow us to power many more homes with community solar. We would also like to see the program doubled from 75 MW to 150 MW a year. Additionally, we'd like to bring utility-scale solar programs to towns who can see the benefits of this renewable energy

We should be creating a full community solar program such as other states have, so that we can advance solar power for everyone in New Jersey. Maryland has a 30% carve-out for community solar for



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projects where 20% of the output serves low and moderate income communities and Massachusetts has roughly 23%. We ideally want at least 20% set aside for community solar in New Jersey and for the state to remove the size cap it has for these community projects to allow for larger projects that can extend to whole neighborhoods and even towns. We also need to remove the cap on the size of the systems themselves. We hope to expand beyond 50 MW a year to at least 100 MW a year as well.

People in the suburbs are putting their own solar panels on their homes. Low- and moderate-income communities and those overburdened by air pollution are disproportionately affected by climate change and therefore should be targeted for this clean energy. As we redevelop or retrofit communities, especially low-income and minority communities, we should include solar as part of it. When we renovate neighborhoods, we should be adding solar to keep electricity costs down. We should try to focus on sound barriers on highways and brownfields, rooftops, and parking lots and other underutilized lands. Prioritizing the location for community solar will allow more people to tap into solar power. Community solar is an important way to advance clean energy while helping environmental justice communities.

We also need to make sure we keep community solar costs down in low-income and minority communities. These projects should be subsidized using the Clean Energy Fund to make the program more accessible for people living in these communities that need the benefits from solar the most. It is also important that the benefits of solar are directed to these communities, including jobs. The Office of Clean Energy Equity should be used to direct solar job training to overburdened communities. It is critical to make sure that everyone can benefit from solar energy.

The pilot program has been a success, now we need a permanent program. We must continue to grow our community solar program because it's an important way to advance clean energy while helping environmental justice communities. We look forward to working with the agency to move forward community solar and use it to benefit the people and environment of New Jersey by providing clean energy and green jobs.

If you have any questions or would like to discuss this matter further, please feel free to call me at (609) 558-9100.

Sincerely,

Jeff Tittel

Director, New Jersey Sierra Club