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State of New Jersey
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Post Office Box 350
Trenton, New Jersey 08625-0350

RE: Comments on New Jersey Community Solar Energy Pilot Program

Dear Commissioners,

Ameresco hereby submits comments New Jersey Board of Public Utilities (“BPU or Board”) “Request for Comments and Stakeholder Meeting Notice (“Notice) on the New Jersey Community Solar Energy Pilot Program issued on July 9, 2020. Thank you for the opportunity to file comments.

Ameresco is a renewable energy developer based in the Northeast with over 368 MW of solar projects completed and in construction across North America, including several projects in New Jersey. We develop solar projects with a range of customers including commercial, utilities, Federal, State and Local governments, as well as community solar projects. We are interested in commenting on this program in effort to better address the challenges of low to moderate income (LMI) offtake and access in these programs.

Comments on Questions

Question 1: How can the Board ease the process by which developers validate LMI status when enrolling subscribers?

We recommend that New Jersey adopt a process by which developers can either partner with Municipal Aggregators and cities and towns to manage the subscription of LMI offtakers, as they are better apt to handle this task and often have access to the lists of LMI ratepayers, or alternatively work with the electric distribution companies (EDCs) to export the power and pass the discount bill credit to the LMI offtaker; the EDC can also manage the subscriptions through opt-in or opt-out to the LMI offtakers. This proposal would also de-risk the LMI offtake for developers, which will reduce overall costs and allow for a larger bill savings to the LMI offtakers. Please see the Low Income Community Shared Solar ([LICSS](#)) proposal under the MA SMART Program or the CT Shared Clean Energy Facility ([SCEF](#)) program for best practice to successfully subscribe LMI offtake and solve many of the access barriers for LMI offtake for clean energy. These two state programs have addressed the two biggest barriers to LMI community shared solar: financing solar that has LMI off-takers and finding LMI subscribers (whose qualified income status as LMI can change overtime). By enabling solar developers to instead pass a portion of the solar incentive to Municipal Aggregators and/or EDCs, who can then distribute the discount to their LMI customers directly on their electricity bills, these barriers are addressed. We are happy to provide further information to the BPU on these programs if interested.

**Question 5: What are the challenges specific to ensuring that low- and moderate-income households in master-meter buildings can become community solar subscribers?
d) What measures should the Board consider to alleviate these challenges?**

See Q1; These issues can be alleviated by working with municipal aggregators and host Public Entities that can allocate bill credits to these buildings' subscribers or working directly with EDCs to offer bill savings to LMI ratepayers.

Topic 3: Program Year 2 Application Process

Question 14: The PY1 capacity was 75 MW(dc). Pursuant to N.J.A.C. 14:8-9.4(b), the PY2 capacity must be at least 75 MW(dc), but could be more. Staff is considering recommending that the Board increase capacity in PY2 to 100 MW(dc), and to 125 MW(dc) for PY3, with the intention of soliciting annually for 150 MW(dc) in the permanent program. Please comment on this proposed plan.

We recommend expanding the procurement to 150 MW per year or more based on the number of qualified applicants in the past – if the program procures a larger capacity, this gives developers more certainty to develop sites to bid in. We also recommend that the New Jersey BPU transitions this PILOT program into a permanent program to give certainty to developers to invest in solar development in the State of New Jersey.

Question 15: The 45 applications granted conditional approval in PY1 represented 17 unique applicants. Should the Board consider limiting the number of applications that are submitted by a single developer, or limit the number of applications by a single developer that will be conditionally approved?

We recommend limiting the number of unique applications per developer to 2-3 projects per developer to allow for a greater diversity in applicants, offtakers and locations across the State of New Jersey to participate in the program

Question 17: The PY1 Application Form made certain sections optional for government entities. Did this facilitate applications by government entities? Should the Board consider a fully separate carve-out and application process for government entities?

As government entities are required to go through procurements to develop solar, this adds longer timelines to award a project to a developer before this project can be ready to bid into the community solar program; this puts a government entity at a disadvantage in the community solar procurement. Therefore, we recommend adding additional capacity for a carve out specifically for government entities. Additionally, we recommend that government entities act as hosts and subscriber organizations for LMI offtakers through a municipal aggregator for instance (see Question 1 and MA SMART LICSS for example).

Additional comments on siting preferences:

We recommend that you consider other types of previously developed sites for preferred siting, including industrial sites such as inactive quarries or sand and gravel pits. This will allow a greater diversity of sites, in addition to greenfields and agricultural dual use.

Thank you for your consideration of these comments. Please don't hesitate to contact us with any questions.

Sincerely,



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