



To: Aida Camacho, Secretary of the Board, New Jersey Board of Public Utilities
Re: Consolidated Billing of Subscriber Fees, NJ Community Solar Energy Pilot Program
Date: April 7, 2021

Thank you for the opportunity to submit comments about the Board's consideration of consolidated billing of subscriber fees as part of the community solar pilot program. We appreciate the Board's commitment to the program and are thrilled to see it expand.

For the thousands of New Jerseyans without access to rooftop solar, net metered community solar subscriptions are essential to powering their homes with affordable, clean energy. As demonstrated by the pilot project, there is a major appetite for community solar throughout the state. We support expanding community solar service areas to especially include overburdened communities, which face an energy burden up to three times higher than the state average. These are communities where households face impossible choices of keeping their lights on or putting food on the table. To make matters worse, without a choice in energy sources, they are forced to buy into power systems that are detrimental to their health. Community solar is an ideal way for these communities to access clean energy, save money, and divest from the current generation systems that harm their health and our planet.

However, households face a major hurdle when trying to connect with community solar. The current model, wherein ratepayers are faced with two bills — one for community solar and one for their utility provider — can be confusing and cumbersome. Furthermore, the two-bill model can hide one of the major benefits of community solar: bill savings and a lower energy burden. We support consolidated billing as a means to make community solar more accessible, particularly for low- and moderate-income (LMI) subscribers for whom having fewer barriers to entry is essential. Doing so can also make clear the savings associated with community solar, making participation even more appealing.

As the Board considers specific questions about the exact setup of consolidated billing, we urge you to take seriously the input from our colleagues who know the issue and vulnerable communities best, including industry groups, consumer advocates, and environmental justice organizations. It will also be critical to include robust consumer protection guardrails, especially for low-income customers. Guaranteed monthly savings can be challenging for developers over the course of a year during which solar generation shifts with seasons and weather, but requiring this for low-income customers should be strongly considered if coupled with increased incentives for serving these populations. In addition, any costs associated with moving to consolidated billing need not be shifted to ratepayers and should be covered by developers and electric utilities.



Our goal must remain a democratized, affordable, and clean grid. Ratepayers need affordable rates, the right to decide where their power is coming from, and relief from the pollutants fossil-fuel powered electricity pours into our air, especially concentrated in our overburdened communities. Community solar access helps arrive at that goal, but we need to make participation smooth and make savings clear. We support consolidated billing as a means to remove barriers to participation for community solar, especially for LMI subscribers.

Respectfully submitted,

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