

New Brunswick Area Branch of the NAACP (Unit #2094)

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April 9, 2021

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In Memoriam

Alan F. Hendrix

Community Solar Statement from New Brunswick Area Branch NAACP New Jersey Community Solar Energy Pilot Program Comments on The Consolidated Billing Stakeholder Process *BPU Docket No. QO18060646*

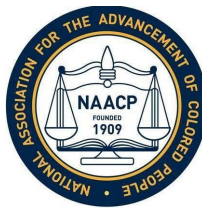
The NAACP appreciates the opportunity to provide the following comments in response to the Board of Public Utilities (BPU) Notice of March 11, 2021 in furtherance of the efforts of the BPU and Governor to expand their commitment to environmental justice in the context of Community Solar. NAACP has been an active participant in the development of Community Solar policy in New Jersey, having previously filed comments with the BPU.

Environmental injustices, including climate change, have a disproportionate impact on communities of color and low-income communities – accordingly, the BPU has made reaching low and moderate income (LMI) customers a priority. To truly address these racial and income disparities in its Community Solar Program, the BPU should first acknowledge the inherent bias that the Community Solar Program has built into its structure with respect to its current billing system.

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 typically affluent, environmentally conscious customers who are willing to go out of their way to sign up for community solar, but these are not the people the BPU must design the Program to reach.

A critical area of importance that we urge the BPU to address to make LMI community solar work is billing. The BPU's current Community Solar Program requires the Community Solar provider to render its own bill, i.e., the customer will

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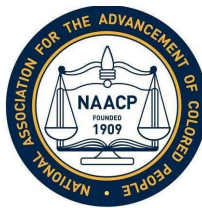
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receive two separate bills, one from their electric utility and one from their community solar provider. The BPU is evaluating “Community solar consolidated billing,” the practice of incorporating the billing for community solar directly on a subscriber’s utility bill as opposed to providing separate bills. We fully support this – but it is of fundamental importance that the BPU implement the right structure for the consolidated billing.

One proposed consolidated billing structure - that used for Third Party Supply (TPS) - is problematic and should not be used because customers with late payments can be removed from TPS consolidated billing. This will de-incentivize community solar providers to pursue LMI customers because LMI customers are more likely to be in debt on their bills, and so these customers could be put back on the inefficient, confusing dual-bill billing structure. Use of the TPS billing approach will make these customers less financially attractive for community solar providers to pursue and will result in fewer LMI customers served at higher rates. In short, adopting TPS billing for Community Solar billing would be a major step backwards in reaching LMI customers, the very customers who the Murphy Administration most wants to reach.

The most appropriate and equitable structure of community solar billing would utilize the features of the successful existing Basic Generation Service (BGS) billing structure. BGS is the electric service provided to customers who do not shop for power supply in New Jersey’s deregulated market. In the BGS billing structure, utilities already include the charges levied by default suppliers on their bills and pay their default (BGS) suppliers on a regular and prompt basis regardless of the customers’ payment patterns or histories. The confusion of two bills is avoided and customer revenue is secured. Using this approach for community solar will result in acceptance of LMI customers into the program, will make solar projects for LMI customers a much more financeable venture, and result in lower cost solar energy to those customers. Accordingly, the BPU should have the utilities provide the same billing and revenue collection used in BGS billing for LMI community solar programs.

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Additionally, the costs to the utilities for providing these services should be socialized and recoverable from its ratepayers, as is the case for the costs of other BPU authorized renewable energy and customer uncollectible recovery programs.

It would be inequitable and unfair to only provide this type of billing and payment approach to BGS customers and not to community solar customers.

Creating an equitable Community Solar Program is within the BPU's reach. We urge the BPU to require the utilities to offer the same consolidated billing method for community solar which is already used for BGS for at least all LMI customers, and ideally for all customers; and to allow utility cost recovery of such initiatives from ratepayers. We look forward to working with you to make New Jersey a national leader in delivering community solar to all types of customers.

Do not hesitate to contact me should you have a need to further discuss.

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