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PRINCETON COMMENTS: COMMUNITY SOLAR CONSOLIDATED BILLING STAKEHOLDER MEETING

Dear Secretary Camacho-Welch,

My name is Christine Symington, the Program Director at Sustainable Princeton. We are a non-partisan, non-profit organization with a mission to inspire our community to develop and implement solutions that positively impact our environment. It's our vision that Princeton is a model town that examines every action through the lens of sustainability, ensuring a healthy environment, a strong economy, and the wellbeing of all community members now and in the future.

In 2019, the Municipality of Princeton adopted a Climate Action Plan that calls for all Princeton community members to efficiently use clean, reliable, and affordable energy. To achieve this vision, the Plan includes pursuing community solar and ensuring maximum participation of our low- to moderate-income (LMI) households.

We applaud the Board of Public Utilities for understanding the importance of consolidated billing. Please accept the following comments on Community Solar Consolidated Billing of Subscriber Fees, Docket No. QO18060646. We provide these comments in response to the Notice of Request for Comments issued by BPU on March 11, 2021.

Firstly, to provide the clarification requested by Jackie Galka, NJBPU Division of Energy, at the March 25, 2021, Stakeholder Meeting Webinar:

1. The use of the term "Basic Generation Service (BGS) Style Consolidated Billing" during verbal comments did not intend to imply that there is any type of purchase of receivables by the utility from a BGS Supplier; instead, it is an abbreviated language for the payment protocol employed when a customer is receiving Basic Generation Service, whereby the payment by the EDC to the BGS Supplier(s) is entirely separate from and is not dependent upon, payment by the retail customer for BGS service. Using this same protocol for Community Solar, the EDC would provide payment to the solar provider on a full (i.e., no deductions, payments, or offsets) and timely (i.e., monthly) basis, regardless of the customer payment status.

2. It would be appropriate and acceptable that, in “exchange” for the security of the BGS-style Consolidated Billing described in the above answer, the community solar project must guarantee savings to their subscribers.

The following comments pertain to Question 2 of the Notice of Request for Comments issued by BPU:

- We recommend implementing consolidated billing for community solar projects because, without consolidated billing, subscribers will receive two bills, causing confusion. The type of consolidated billing is important. Specifically, we advocate for “Utility Consolidated Billing,” using the features of BGS Consolidated Billing for Community Solar Consolidated Billing.
- Third-Party Supplier (TPS) consolidated billing is problematic because customers in arrears can be removed from TPS consolidated billing. It discourages community solar providers from subscribing LMI households because of the likelihood of being behind on their bills. This likelihood has increased due to the COVID-19 pandemic as more households struggle to pay their utility bills.
- The solution to the above issue is a billing approach that mirrors Basic Generation Service or BGS billing. The payment to suppliers is regular, and the utility is not allowed to remove a customer from consolidated billing for being behind on their payment.
- BGS style billing has been used successfully for over 20 years. For community solar to achieve our social justice goals and for Princeton to achieve its climate action goals, we should not exclude LMI customers from this same consolidated billing approach. BGS style billing will lead to more LMI customer participation at a lower cost because community solar developers get stable revenue and are incented to serve them.

Princeton has approximately 1,000 LMI households and will have several hundred more in the next few years as it fulfills its affordable housing commitments. Our current and future neighbors - and all New Jersey LMI households - should have a simple, customer-friendly experience as participants in New Jersey’s clean energy future. We urge the BPU to require the utilities to use the same consolidated billing method already used for BGS.

Thank you for your time and consideration.

Sincerely,

Christine Symington
Program Director
Sustainable Princeton