Docket No. QO18060646, Community Solar Consolidated Billing of Subscriber Fees

Joint Solar Association Comments

April 9, 2021

I. Introduction

In response to the New Jersey Board of Public Utilities' ("BPU") March 11, 2021 Public Notice soliciting comments regarding community solar consolidated billing, the Solar Energy Industries Association ("SEIA"), Coalition for Community Solar Access ("CCSA"), and the New Jersey Solar Energy Coalition ("NJSEC") offer these comments. We thank the BPU for hosting the March 25th stakeholder meeting and look forward to enhancing the customer experience in New Jersey's eventual permanent Community Solar Program.

SEIA is the national trade association for the United States solar industry. With more than 1,000 member companies nationwide, SEIA is leading the transformation to a clean energy economy, creating the framework for solar to achieve 20% of U.S. electricity generation by 2030. SEIA works with its 1,000 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar powers.

CCSA is a national Coalition of businesses and nonprofits working to expand customer choice and access to solar energy for all American households and businesses through community solar. CCSA's mission is to empower every American energy consumer with the option to choose local, clean, and affordable community solar. We work with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win, win, win for all, starting with the customer. Our members are actively engaged in New Jersey's Community Solar Market and we appreciate the opportunity to comment on New Jersey's successor solar program.

NJSEC was formed to create public policy support for New Jersey's solar industry. NJSEC works in legislative outreach, education and the development of realistic public policy alternatives that align with the fiscal and social circumstances that are unique to New Jersey. NJSEC members include local and national developers, SREC market traders and analysts, engineers, legal and accounting professionals supporting all phases of New Jersey's solar industry.

SEIA, CCSA, and NJSEC are supportive of implementing consolidated billing as an option for Community Solar Subscriber Organizations. Optional participation should be structured to allow Community Solar Subscriber Organizations to opt-in, but it would not be mandatory. Specifically, SEIA, CCSA, and NJSEC are strongly supportive of implementing the option for net crediting for community solar to enhance participation and decrease market risks. If implemented properly with a reasonable fee structure and with a transparent, easy-to-understand customer interface; net crediting can provide

direct benefits to New Jersey community solar customers—including low-to-moderate ("LMI") subscribers---and help New Jersey achieve its clean energy and equity goals by enabling greater access to community solar development at lower cost.

II. Net Crediting through Consolidated Billing

Under the Pilot Program, Community Solar Subscriber Organizations enroll individual customers as "subscribers" to their projects. Subscriber Organizations allocate a percentage of their community solar project's energy production to each subscriber and the subscribers, in turn, receive community solar bill credits on their utility bills based on their allocated share of power produced. Under the Pilot Project regime, customers pay their subscription fees directly to the Subscriber Organization and separately receive the bill credits associated with their subscription on their utility bill. Across the nation, multiple billing systems have been frequently cited as an impediment to increasing participation in community solar programs. An option for net crediting consolidated billing would remove billing and collection barriers to community solar, particularly for LMI subscribers. Under net crediting, as is implemented in New York, the utility would manage the allocation of credits to customers and developers and remove the need for billing and collection between the Subscriber Organization and the subscriber. Net crediting is structured so that the utility will allocate a net credit to the subscriber and the remaining credit to the Subscriber Organization, minus a utility administration fee (which may be equivalent to 1% of the total credit). Net crediting with the purchase of receivables (POR), removes the need for a Subscriber Organization to collect subscription fees from subscribers and also removes the barrier of non-payment of subscription fees to Subscriber Organizations subscribers. The combination of consolidated billing with net crediting and POR dramatically simplifies the billing equation for the subscriber, the Subscriber Organization, and ultimately the EDCs. Under a net crediting program, the subscriber only receives a credit on their bill without having to worry about additional fees. This also relieves financing risks for collection, which will support the LMI community's participation in the community solar program.

From the customer's point of view, consolidated billing through net crediting fundamentally changes the relationship between the customers and the Subscriber Organization by placing all community solar subscription information on the subscriber's utility bill. This will enhance the customer experience for those that prefer a single bill. For LMI customers this is especially important, because increasing the number of bills that LMI customers must pay is a significant barrier—even if the result of their participation as a subscriber is a net savings.

This billing format also enables greater participation from customers with limited or no credit. Being subjected to a credit check for a community solar subscription is a barrier to participation, even for potential subscribers with good or excellent credit scores. Furthermore, the net crediting model would further ameliorate the barrier since there is no billing and collection between the Subscriber Organization and the subscriber, which removes the hard and soft costs.

As credit checks are more widely eliminated, the addressable market of community solar participants increases, which allows great substitutability for any subscriber transfers and cancellations. As a result, the overall risk profile for some projects can improve, projects become more cost-effective

from a financing perspective, and volatility in the market can decrease. Though the financial community is increasingly comfortable with community solar as a product offering, innovations like net crediting approaches can therefore accelerate the attractiveness of community solar to additional financiers and bring down financing costs even further.

Additionally, because net crediting reduces billing and collection costs for Subscriber Organizations who opt in and no longer need to send bills, monitor collections, or experience lost revenue because of customer non-payment, net crediting has the potential to reduce soft costs associated with community solar project development and operations.

However, it is worth noting that despite the many benefits of the net crediting approaches, it is important to remember that any soft cost reductions will be offset to some extent by any fees the utility will charge to offer the services. As previously stated, the implementation of the net crediting participation will fundamentally change the customer relationship with Subscriber Organizations and their interaction with a community solar facility. Many community solar providers will continue to engage in customer acquisition, customer relationship management, and customer churn, even if they are no longer conducting the actual billing. Therefore, the amount of soft cost reductions achievable from net crediting should not be overestimated. Indeed, the actual cost savings to projects owners will be heavily dependent on any fee structure approved by the BPU. Moreover, SEIA, CCSA, and NJSEC recommend that a percentage of the billed amount is preferable over a per customer fee since it is easier to align with the community solar product offering. We also urge the Board to ensure any consolidated billing option is consistent with the overall goals of the Community Solar Program, which provides parity for customers who are unable to host rooftop solar to similarly experience the benefits of solar energy—the savings and the experience. Without rooftop panels and the direct flow of electricity, these customers are reliant on the billing process and communication with subscriber organizations to experience and track their participation. Maintaining this customer relationship ensures a subscriber will remain connected to their individual contribution to combat climate change and experience the full benefits of their community solar subscription.

In light of that consideration, for consolidated billing through net crediting to be implemented successfully and anchored in customer experience and cost-effective market measures, consolidated bills must provide community solar subscribers with (1) a clear and precise accounting of the net community solar bill credits to both the subscriber and the Subscriber Organization; (2) specific information describing where (community solar provider/project) and when their credits were generated; (3) a detailed accounting of any administrative fees charged by the Utility; and (4) purchase of receivables. Finally, there should be provisions to ensure accuracy for the application of credits and accountability or procedures to resolve any errors.

III. Responses to Specific Questions

1) ***What lessons can be drawn from consolidated billing for TPS customers with respect to its potential application to community solar? What are the advantages or disadvantages of Utility Consolidated Billing, TPS Consolidated Billing and dual billing as they apply to community solar?***

Dual billing is the default method used in successful community solar programs in other states and while it has a logistical disadvantage for some customers, it allows subscriber organizations flexibility to clearly communicate the benefits of a subscription to the customer. As noted above, the billing process is the primary method by which customers interact with their community solar subscription organization, and as such how that information is presented and communicated is critical for the customer experience. Entrepreneurial companies are incentivized to make this value as clear and transparent as possible in every interaction with the customer, but especially in designing the visual impact of their invoices. These communications serve to create trust between the subscriber organization and subscriber and can emphasize not only the monthly, but lifetime savings of the project to the customer, as well the environmental impact in salient terms of "trees planted" or "cars taken off the road." Thus, it is important that consolidated billing does not undermine the connection between the subscriber and the local solar project they are subscribed to.

In many ways consolidated billing for community solar could mirror the existing system for electric and natural gas third-party supplier transactions, where electric distribution companies (EDCs) already bill customers, collect revenues, administer collection (or termination) activities, and pay Third Party Suppliers on a regular basis. If implemented properly with a reasonable fee structure that is transparent, and has an easy-to-understand customer interface, consolidated billing with a net crediting approach will benefit customers who often find it confusing and cumbersome to pay two bills for electricity and reduce soft costs for community solar developers and subscriber organizations. Additionally, SEIA, CCSA, and NJSEC believe strongly that a net crediting approach to consolidated billing can help community solar be a critical tool for increasing equity and justice in our energy system, helping traditionally underserved communities benefit from the state's transition to a clean energy economy. We urge the Commission to consider the net crediting model.

2) ***Do you recommend implementation of some form of consolidated billing for community solar projects? If so, do you recommend Utility Consolidated Billing, or third party provision of consolidated billing for community solar subscriber fees (Subscriber Organization Consolidated Billing)?***

Yes, SEIA, CCSA, and NJSEC recommend consolidated billing and net crediting as an option for Community Solar Subscriber Organizations, however we want to emphasize programmatic consistency regardless of the entity consolidating charges. We believe however, that any approval of a utility consolidated billing program should also provide for competition through approval of Third Party Supplier consolidated billing.

3) ***Please describe in detail how your proposed method of consolidated billing would work and the benefits you believe would be achieved by the use of consolidated billing for community solar. Please address all related issues, including the following:***
   a) ***Would the bill be sent by the utility (Utility Consolidated Billing) or the subscriber organization (Subscriber Organization Consolidated Billing)?***

b) ***How would your proposal address customer nonpayment of bills, partial payment of bills, and late payment of bills? In cases of partial payment of bills, which portion of the bill should the payment be allocated towards?***
c) ***Should customers be dropped from consolidated billing for late payments?***
d) ***Discuss any purchase of receivables issues.***
e) ***Discuss any issues relating to consumer credit.***
f) ***Should there be a fee using consolidated billing and, if yes, what should it be?***
g) ***Discuss any consumer protection implications of utilizing consolidated billing for community solar, including data privacy and data protection.***
h) ***How would customer specific data be exchanged?***

If requested by a community solar organization, an electric distribution company (EDC) shall enter into a net-crediting agreement with the community solar organization to include a subscriber's subscription fee on their monthly bill and provide the customer with a net credit equivalent to the total bill credit value for that generation period minus the subscription fee, provided the subscription fee is structured as a fixed percentage of bill credit value. The net crediting agreement shall set forth payment terms from the EDC to the community solar organization and EDCs may charge a net crediting fee to the community solar organization that may not exceed one percent of the bill credit value. Under this optional consolidated billing approach, the EDC shall remain responsible for billing all basic electric services, including transmission, distribution, and generation charges, but Subscriber Organizations will be responsible for customer inquiries related to their subscription. Subscribers will receive a single consolidated bill with clear and precise accounting of community solar bill credits, specific information describing where (community solar provider/project) and when their credits were generated, and a detailed accounting of any community solar subscription information and administrative fees charged by the Utility. This simplified payment structure will greatly improve the customer experience, remove barriers to community solar participation—especially for low-income customers—and reduce soft costs associated with community solar project development and operations.

It is possible that community solar subscribers will be more likely to pay their utility bills than non-community solar customers because the customer has already expressed a proactive interest in managing their electricity choices or because timely payment will ensure they can remain on the community solar subscription, which in many cases will result in a cost savings to the customer. As a result, it is possible that community solar consolidated billing will help utilities reduce their typical uncollected costs. However, the utility should advise the subscriber directly of any nonpayment consistent with current practice, separate from the customer bill, and notify the Subscriber Organization. Indeed, many of these issues can be avoided through net crediting which removes any need for billing between the Subscriber Organization and the Subscriber. Additionally, data sharing between utilities and Subscriber Organizations can be made easier and more efficient to further reduce barriers.

4) ***If you are or represent a community solar developer or subscriber organization, please describe in detail the terms of the agreement between the subscriber and the subscriber organization.***

Net crediting agreements between Subscriber Organizations and EDCs should set forth payment terms from the EDC to the community solar organization and clarify that EDCs may charge a net crediting fee to the community solar organization that may not exceed one percent of the bill credit value.

5) ***Do any subscriber organizations currently use consolidated billing for community solar subscriber fees in other jurisdictions?***

Yes, New York has begun to embrace a "Net Crediting" billing model, in which utilities make direct payments to community solar providers for the value of their community solar production, minus a fee, and then allocate the "net" credits to consumers on their utility bills.

Virginia is also embarking on an optional net crediting approach where the utility may charge a net crediting fee not to exceed 1% of the bill credit value and each utility shall, on a monthly basis and in a standardized electronic format, provide the subscriber organization a report indicating the total value of bill credits generated by the community solar facility in the prior month, as well as the amount of the bill credit applied to each subscriber.

Furthermore, Pennsylvania is contemplating legislation to enable community solar that provides for optional net crediting agreements between subscriber organizations and EDCs. These net crediting agreements would include a subscriber's subscription fee on the monthly bill and provide the customer with a net credit equivalent to the total bill credit value for that generation period minus the subscription fee, provided the subscription fee is structured as a fixed percentage of bill credit value. The net crediting agreement would also set forth payment terms from the EDC to the community solar organization and clarify that EDCs may charge a net crediting fee to the community solar organization that may not exceed one percent of the bill credit value.

6) ***Are subscriber organizations paying an administrative fee to EDCs for the use of consolidated billing of subscriber fees in other jurisdictions? If so, how is it structured? If not, how does the EDC recover those costs?***

SEIA, CCSA, and NJSEC recommend that fees charged for consolidated billing take into account administrative functions specific to consolidated billing and not contemplated in other IT and billing system upgrades the EDC is already planning to make.

7) ***Should consolidated billing of community solar subscriber fees only be available to projects that provide a guaranteed monthly savings to subscribers? If not, would the provider of consolidated billing be expected to charge subscribers for their community solar participation resulting in an amount due greater than the amount due for electric service? Should this result be permitted for low- to moderate-income (LMI) customers?***

SEIA, CCSA, and NJSEC support the intent of ensuring that customers do not experience a net cost associated with their participation in community solar subscriptions, especially for LMI customers. While being overly prescriptive about the savings or the discount may inadvertently stifle business model innovation and products that have value propositions tailored to specific customers, customers, most importantly LMI customers, should see a net savings if participating in community solar. In the New York

net crediting program, subscriber organizations must commit to at least a 5% guaranteed savings to participate, a relatively low bar to clear, but meaningful savings as a program savings floor.

8) ***Please provide comments on the following framework for utility consolidated billing of subscriber fees, which is currently being implemented in New York:***
   a) ***Utility consolidated billing of subscriber fees is optional for community solar projects. If a project chooses utility consolidated billing of subscriber fees, all subscribers enrolled in that project are billed via utility consolidated billing (with the exception of one anchor subscriber per project).***
   b) ***In order to participate in utility consolidated billing, all subscribers enrolled in the project must receive a percentage of their original community solar credit on their bills each month. Currently, this minimum percentage is five percent (5%) in New York.***
   c) ***The subscriber fee is a percentage of the subscriber's original community solar credit each month. The dollar amount of the subscriber fee varies each month based upon the underlying community solar credit.***
      - ***Example: The subscriber fee is 90% of a customer's community solar credit. On the monthly bill, the customer receives 10% of their credit. The remaining 90% of the credit is remitted by the EDC to the subscriber organization less the administrative fee retained by the EDC.***
   d) ***At least 60 days prior to operating under a consolidated billing framework, the community solar project owner must provide the EDC with the percentage of the subscriber community solar credits that is available to be applied to the subscribers' bills***
   e) ***The same percentage must be applied to all subscribers for the same project (with the exception of an anchor subscriber, if applicable, that will receive its entire community solar credit on its utility bill and is billed by the community solar project owner for subscription fees). The percentage can change no more frequently than every six (6) months.***
   f) ***Subscriber organizations must agree to use the EDC's communication tool for sharing subscriber percentage information***
   g) ***The EDC retains a portion of the subscriber fee to compensate for their implementation and administrative costs associated with utility consolidated billing. This results in the Subscriber Fee percentage in item "c" above being reduced***
   h) ***The EDC receives timely recovery of subscriber credits through a surcharge or similar mechanism.***

SEIA, CCSA, and NJSEC members report that consolidated billing and net crediting has lowered the barriers to adoption by customers and has, in general, simplified the customer experience. It has also reduced the need for subscriber organizations to collect payment information upfront, which is frequently cited as the single biggest barrier to subscriber enrollment.

Regarding item a, the joint commenters recommend clarifying that the "anchor" is an anchor customer, rather than an anchor account. Some anchor customers may have multiple accounts. For instance, if the exception is only allowed for one anchor account, that could be complicated for anchor customers that

are assigning credits to multiple accounts as often seen with housing facilities with multiple meters, for example.

For item e, SEIA, CCSA, and NJSEC strongly recommend flexible savings levels instead of requiring the same percentage of savings for all customers. In order to address energy burdens carried by some customers, flexible savings will enable community solar providers to allocate additional cost savings to low- and moderate-income customers. One limitation of New York's net crediting program is that it does not allow flexibility in enrolling multiple accounts for an anchor customer, such as a Town or Municipality- New York requires only a single utility account for an anchor customer can be held at a different rate than the other satellite customers. It would be important to allow for this flexibility so Towns, Municipalities and other public entities can have the flexibility to aggregate multiple Town accounts to benefit from a solar project as an anchor tenant.

In reference to item f, we oppose being required to use the EDCs communication tool for sharing subscriber percentage information. It is the recommendation of the joint commenters to ensure consolidated billing be optional for subscriber organizations. Therefore, this requirement could impede subscriber organizations who opt out of participation from being able to properly and accurately communicate subscription and savings to the subscribers. For subscriber organizations who opt into the program, we would advocate for a standardized communication tool to be adopted by all of the EDCs to ensure transparency, which we discuss in greater detail in response to question 13. Furthermore, a billing and crediting workgroup should be established between industry leaders, participating subscriber organizations, consumer advocates, the EDCs, and any other stakeholder the Commission staff deems appropriate, to discuss the EDC's communication tools, reporting requirements and timelines, bill credit accuracy, and any other issue that may need to be addressed.

With regards to item g, the subscriber fee and the fee percentage should not be substantial. It is a best practice to ensure the fee percentage retained by utilities is currently no higher than 1%, as seen in New York and Virginia. The same 1% fee structure has also been proposed in the Pennsylvania legislation to address consolidated billing and net crediting.

Lastly, SEIA, CCSA, and NJSEC recommend updating utility customer subscription lists monthly. A clear process and timeline for utilities to accept subscriber information and update customer lists each month, communicated clearly to subscriber organizations, will be important to a successful program. Minimally, this will be critical to ensure all bill credits are allocated to customers in a timely and accurate fashion. Members have experienced significant delays and lack of transparency with customer updates in other markets, such as Maryland and Washington D.C. New Jersey is in a position to set up a framework that delivers on the goals by ensuring community solar customers' needs and savings are realized in a timely and reliable manner.

9) ***If you disagree with any portion of the framework in Question 8, please describe in detail the framework you would support (or refer to your response to Question 3, as relevant). Include specific examples from other jurisdictions, if possible***

New York's consolidated billing program does not allow for subscriber organizations to offer different discounts to different subscribers on the same project. Subscriber organizations routinely offer different discounts for LMI subscribers who will generally receive a greater discount relative to others. This is obviously beneficial for the LMI subscribers, but it also reflects the market reality that LMI subscribers are more difficult to acquire and the increased discount improves participation.

If subscriber organizations are not able to differentiate offers, the result will almost certainly be all subscribers receiving the lower offer. For most LMI subscribers, the greater discount is likely to outweigh any logistical advantages of consolidated billing. To achieve the goals of serving overburdened communities, SEIA, CCSA, and NJSEC strongly recommend allowing for subscriber discount flexibility by project.

As the Board evaluates consolidated billing, stakeholders must continue to be involved in the process and vetting of any consolidated billing option. The lack of ability to differentiate offers to subscribers is an obvious flaw in the New York program that has altered the market substantially, and for the worse. The Board can avoid this by continuing a robust stakeholder process and ensuring that any option is truly viable for the New Jersey market.

10) ***In the case of Utility Consolidated Billing, if you are a community solar subscription organization, should you opt to participate in Utility Consolidated Billing would you maintain backup billing procedures to bill customers who fail to pay the EDC for their community solar subscription? What other options would you suggest to address the risk of non-payment by customers?***

SEIA, CCSA, and NJSEC strongly recommend net crediting with purchase of receivables as a solution to non-payment. Net crediting with POR would fully remove the risk of non-payment of community solar subscriptions since the customer receives the net credit and is not required to pay community solar subscription costs. The remaining net credit, minus any utility administration fees is then paid to the Subscriber Organization. The net crediting with POR model is therefore the best approach to removing the risks of non-payment.

11) ***What are the potential challenges to implement consolidated billing for community solar? How can these challenges be addressed?***

An important consideration is the presentation of the subscription credits and charges on a subscriber's bill. Credits, charges, and other information regarding a community solar subscription should be clearly marked and accessible on a subscriber's bill and should specifically note that it is a "community solar credit" or the equivalent, as well as the specific subscriber organization applying the credit. This is essential information for the subscriber to be able to understand and track their subscription. It is also crucial to the broader goal of the program to provide a direct connection between a subscriber and a local solar project that this information is accessible and not buried such that subscribers will be able to find it easily.

Under the net crediting model, there should also be a process for ensuring that the utility allocates credits to the Subscriber and Subscriber Organization in a timely fashion. There should be a mechanism

in place to easily solve any mistakes in billing and allocation, or if credits are not allocated on a timely basis.

Subscriber organizations will also need to be able to track what is being applied to subscribers' bills, and to be able to verify for accuracy**.**

While consolidated billing has many benefits and guidelines and automated processed should limit errors, experience in other states has shown that errors are likely a feature of any program. As a result, there should be an orderly process in place to quickly correct any error within 30 days of their identification and if errors continue to occur or are unable to be resolved, there should be a formal path to raise those issues with the BPU to assist in resolution. One lesson learned from other states, such as New York, is that it is useful to have an open forum to raise and work through implementation issues around the billing process. As a result, the BPU should consider forming a Billing and Crediting Working group, made up of representatives from the EDCs, Subscriber Organizations, and Commission Staff, to tackle these issues on an ongoing basis.

12) ***If Utility Consolidated Billing were available, how would subscriber billing inquiries be handled? Would subscriber inquiries regarding subscriber fees and/or community solar credits be handled by the subscribing entity or the developer, or would the utility be required to take on that role?***

Efficient, timely, accurate crediting of customer utility bills and communication between Subscriber Organizations and the utility is vital to a satisfactory customer experience. Subscriber organizations should provide customers an address and telephone number for customer inquiries and complaints regarding services provided by the subscriber organization and that number should be stated on all customer-billing statements provided by the utility, which enables customers the opportunity to interface with their subscriber organization regarding their subscription. Subscriber organizations should immediately direct a customer to contact their utility if the customer has a service emergency or non-community solar subscription inquiry, and such direction can be given both by a customer service representative of the Subscriber Organization or by a recorded message on their telephone number.

On the other hand, customer support representatives for utilities should be trained on New Jersey's Community Solar Program and be able to generally communicate with customers on the relationship between the utility and Subscriber Organizations and to refer subscribers, as necessary, to the relevant Subscriber Organization contact person.

In other states, customers with questions may reach out to the utility instead of the contact at the Subscriber Organization, but customer support representatives may not be aware of the program, leading to customer confusion. Ensuring an awareness and general knowledge of the program, and the relationships between Subscriber Organizations and the utilities, will benefit utility customers on where to go for specific inquiries. Furthermore, the Billing and Crediting Working Group should help address any issues that arise around relevant billing inquiries or billing errors on an ongoing basis.

13) **If Utility Consolidated Billing were available, how would subscriber billing information be provided to the utility?**

SEIA, CCSA, and NJSEC recommend that BPU create a standard template that all utilities and subscriber organizations would use to exchange data. Subscriber organizations should have equal access to data, regardless of whether they choose to participate in consolidated billing or not. All stakeholders would have to agree on the data format and the validation checks that files would have to pass for files to be accepted, but at a minimum the following data would need to be exchanged via secured electronic communication:

- Customer name
- Utility Account number
- Total system generation (kWh and dollar value and allocated %)
- System generation allocated to subscriber (% and kWh)
- System generation allocated to Subscriber Organization (% and kWh)
- Subscriber Organization Balance (kWh, and $, if applicable)
- Credits allocated to customer (kWh)
- Value of Credits allocated (kWh and dollar value)
- Credits applied to customer balance
- Customer banked credits that are available, if any
- Charges from Subscriber Organization
- Balance of any banked credits & charges
- Production period
- Billing period of subscriber
- Estimated date of credit application
- Customer rate class
- Final billed customers (name, account number, final bill date, credit balances)

Secured electronic communication is necessary for successful consolidated billing. Email will not accommodate scale and is subject to inefficiencies such as manually entering passwords into protected documents, manually downloading and uploading files sent as email attachment, among others. Ideally, information should be communicated by API, though other options are possible, such as the use of cloud-based customer relationship management software (which has been proven as a reliable option for sharing information in Xcel's community solar garden program in Minnesota), and Secure File Transfer Protocol (SFTP), although there is likely less automation available with this option and SFTP's ability to accommodate scale is likely limited.

Relying on existing infrastructure used in New Jersey for retail suppliers—Electronic Data Interchange (EDI)—is also a possibility, though SEIA, CCSA, and NJSEC caution against requiring the use of existing New Jersey Electronic Data Interchange (EDI) protocols without considering other options that might be less cost prohibitive to New Jersey's Community Solar Developers.

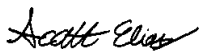
Whatever method is ultimately decided upon, the BPU should consider the attainability of the communications platform for community solar providers. For example, an EDI requirement might disadvantage small businesses, community-based community solar provider models, and non-profits

given the level of sophistication and expense necessary to utilize a particular platform and/or technology.

Conclusion

Thank you for your consideration of these responses. We look forward to continued dialogue on many of the subjects discussed in these comments and our respective organizations and members look forward to working with BPU to develop a long term, sustainable community solar market in New Jersey.

Respectfully submitted,



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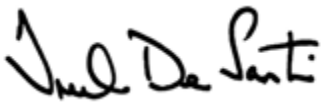

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