

Good morning Commissioners, members of the staff, and fellow stakeholders. Thank you for the opportunity to testify. My name is Elena Weissmann and I am the Mid-Atlantic Regional Director with Vote Solar, a national advocacy organization working towards a robust and equitable solar economy with over 1,500 members in the Garden State.

I first want to thank you all for the weight you are giving to public testimony, and the transparency with which you are engaging in the successor planning process. I know my predecessor Pari Kasotia was engaged in this work with many of you, and it's great to put faces to names now. We at Vote Solar really appreciate the Board's commitment to maintaining and advancing New Jersey's leading role in using solar deployment as a vehicle for environmental justice, workforce development, and sustainability.

Today, I want to focus my comments on two elements of the successor program: the community solar permanent program, and the low-income solar incentive programs.

First, on community solar:

We are especially appreciative of the inclusion of LMI provisions in the community solar program, and other suggestions that we and other advocates recommended in years past. Looking forward, we support a transition to Option 2, the first come first served model, as supported by our industry partners CCSA and SEIA. We also recommend several changes to ensure the program can most effectively benefit low-income ratepayers.

These changes are further detailed in our written comments, but I do want to highlight two --

First, we recommended an increase in the proposed 150 MW capacity for community solar. Community solar is the key to bringing solar access to renters and the millions of New Jerseyans who don't have solar ready roofs. Given the pent-up demand for community solar, the program cap should be larger than the residential net metering cap.

Second, we oppose the Board's tightening of the low income verification processes for community solar registration. The process is already onerous and undermines the accessibility and equity goals of the community solar program. Instead, we support a self-attestation or a geographically based verification system that targets environmental justice and overburdened communities.

Next, on low income ratepayer programs:

As the Board is no doubt aware, decades of underinvestment in and discrimination against low-income people and communities of color has entrenched stratifications in

our society along race and class lines. New Jersey has a powerful opportunity to enact economic justice -- strategically investing in overburdened communities to right these historical wrongs. Economic justice requires more than service provision; it means building wealth. One way to do so is by supporting a low-to-moderate income adder for residential solar, in addition to community solar. Recently released solar demographic data from the Lawrence Berkeley National Lab shows that New Jersey's solar adopters are increasingly wealthy. The Board should be working to level the playing field by diversifying its low-income solar offerings and further incenting low-income residential solar adoption.

There is no one-size-fits-all approach to promoting economic justice through solar. At minimum, the Board should differentiate between LMI and non-LMI Net Metered Residential, and provide a higher incentive value for the former. Another way to build wealth among LMI communities is to foster the development of and prioritize project approval for community solar developers from overburdened communities. The Board should also offer an adder for multifamily residential solar, and community-owned solar. Lastly, the proposed solar plus storage pilot is a proven way to promote resilience in communities most affected by climate change, and it should also be used to promote intergenerational economic resilience in these overburdened communities most affected by historic economic injustice.

Thank you again for the opportunity to testify today and submit written comments that provide greater detail on our recommendations. It was a pleasure to meet you albeit virtually. Thank you again for your leadership on solar access and equity and in New Jersey. Together we can make this solar successor program a vehicle for environmental and economic justice. I look forward to working with you as we execute these critically important programs.