

Section IV: Megawatt Targets

27. Should the annual capacity targets for the administratively set program be set broadly for the whole program, or should the administratively set program be further sub-divided into market segments with individual cost caps? In other words, should the Board set cost caps for the residential sector, net metered commercial rooftop, net metered commercial ground-mount, etc., or simply allocate a certain amount of money to the whole net metered program? Staff notes that the community solar segment will have its own cost cap.

Source supports the community solar segment maintain its own cost cap.

28. Should the annual capacity targets for the competitive solicitation tranches be set with flexible parameters, such that the Board may accept more or fewer projects into any particular tranche based on viable project applications and pricing, as long as the total projects accepted into the competitive solicitation don't exceed the overall annual budget cap?

Yes, Source supports flexible parameters to the tranches so that the Board may accept more or fewer projects into any particular tranche based on viable project applications and pricing, as long as the total projects accepted into the competitive solicitation don't exceed the overall annual budget cap.

29. Please comment on Staff's proposed megawatt targets for the first year (EY 2022) (see page 22).

Source supports an increase in megawatt targets for community solar. The competitive solicitations in the PILOT program have left hundreds of megawatts of potential community projects without awards. The new program design should contemplate a way to deal with this "backlog" by allocating a higher percentage of the total cost cap to community solar. Additionally, community solar specifically the LMI requirements, is the main way to promote the goal of inclusion in NJ solar so community solar projects should be prioritized from a policy perspective versus other project types.

Ensuring State Policy Priorities

35. Should "adders" or "subtractors" be used to further differentiate incentives by project attributes in both the administratively set incentive program and the competitive solicitation, only one program, or neither? Explain why.

Source supports adders and subtractors as a tool to reach policy goals in both programs. An adder for the LMI portion of community solar projects can help developers and subscription management companies with the additional costs of targeting, verifying, and acquiring LMI customers.

36. Would adders make the administratively set incentive program too complex when coupled with the anticipated differentiation envisioned for residential, non-residential roof, non-residential ground, community solar LMI, and community solar non-LMI? How could they be used most effectively?

Siting adders should be separate from off-taker type adders but both types of adders could be implemented.

37. Should the administratively set incentive program include an adder for projects that benefit environmental justice communities? For the competitive solicitation? If so, should there be criteria to select the projects with the highest benefits? How can "benefits" for these communities be quantified?

Source supports an adder for environmental justice communities for any project type. A scoring rubric should be implemented by the Board similar to the scoring for community solar projects under the PILOT program. The scoring could consider whether the project is physically located in an

environmental justice community, creating jobs in an environmental justice community, and providing energy to residents in the environmental justice community as the criteria.

38. How else could the Board consider designing the program to encourage broader participation among traditionally underrepresented groups?

Source supports redefining and expanding the definition of a qualified LMI subscriber under the permanent program.

Source suggests maintaining proof of participation in LIHEAP, Universal Service Fund, Comfort Partners, and/or the Lifeline Utility Assistance Program as one way to qualify.

However, requiring copies of the first and second pages of the would-be subscriber's previous three years' Federal income tax returns is prohibitive to acquiring subscribers.

Affordable housing providers may also qualify as LMI subscribers under certain circumstances. Source suggests that any affordable housing provider or person residing in affordable housing should qualify without further documentation.

Source suggests the Board develop a map of disadvantaged communities based on census data, similar to the NYSERDA developed map and definition in New York, and allowing any resident of a designated disadvantaged community to qualify without further documentation.

Section VII: Community Solar Permanent Program

39. Please comment generally on whether the Board should consider maintaining the competitive solicitation for community solar projects in the Permanent Program, or if it should adopt strict qualifications and otherwise establish a first-come, first-served model (detailed as Option 1 and Option 2 on pages 40-41).

Source suggest maintaining the competitive solicitation as a means of ensuring the most mature and highest quality projects are awarded.

40. Please comment on the Pilot Program rules (detailed beginning on page 41) and discuss which, if any, the Board should consider modifying for the Permanent Program, and why.

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Source suggests the Board develop a map of disadvantaged communities based on census data, similar to the NYSERDA developed map and definition in New York, and allowing any resident of a designated disadvantaged community to qualify without further documentation.

41. Currently, community solar projects must be sited in a single location and are not permitted to include aggregated rooftops.

a. Should the Board consider revising this policy to allow aggregation of rooftop projects, up to the 5 MW capacity limit? Please comment on this general policy, and if you agree, what kind of limitations should the Board set with respect to the proximity of the rooftops, site control or ownership, etc.

Aggregated rooftops on one site should be permitted as well as aggregated rooftops and carports on one site.

b. What should the Board consider with respect to the competing value of rooftop space, particularly on multi-unit residential and small commercial buildings, in locating HVAC or other equipment necessary for future energy efficiency and building decarbonization measures?

This should be considered on a project by project basis individually.