

April 26, 2022

To Whom It May Concern,

I am writing on behalf of the NAACP to support New Jersey's Community Solar Energy Program and its transition to a permanent program. I participate in the Vote Solar monthly calls and am well informed about the community solar program and the benefits it brings to NJ residents.

The vision of our organization is to ensure a society in which all individuals have equal rights and there is no racial hatred or discrimination. With more than 2,200 units across the nation powered by well over 2 million activists, the NAACP is the preeminent home of grassroots activism for a range of civil rights and social justice issues.

From the point of view of the NAACP, community solar programs are an important element in the struggle for environmental justice. They have already brought lower utility costs, cleaner air, and workforce development to marginalized communities. We want to ensure those benefits continue and recommend the following as part of the stakeholder feedback:

1. **The BPU should continue to award community solar projects through a competitive scoring process.** My organization has seen an extraordinary level of support (financial and otherwise) from solar companies as a direct result of those companies' competing for my organization's partnership in order to score points on their project applications. And my organization's constituents have been direct beneficiaries of discounts and other perks from solar companies wanting to win over customers. Changing to a first-come-first-served project-selection process would eliminate these substantial benefits of the competitive process.
2. **The BPU should award more community solar projects.** Community solar projects provide real, tangible benefits to my organization and my organization's constituents, many of whom cannot benefit from traditional residential solar (e.g., because they do not own their homes and/or live in buildings without suitable rooftops). Community solar is the best – and, in many cases, only -- way for my community members to get the savings and other benefits of green energy. We need a substantially larger community solar program to reach NJ's many deserving potential subscribers.
3. **The BPU should reduce barriers to low-income and moderate-income (LMI) subscribers.** Households that have "low income" or "moderate income" should be able to qualify as LMI customers for community solar without needing to jump through invasive hoops (e.g., proving that they are on food stamps). If someone swears in writing that he or she qualifies as having low income or moderate income, that should be enough. Asking for more deters residents from wanting to sign up for the community solar program.

Thank you for considering these comments. We look forward to continuing to strongly advocate for clean energy equity in our community.

Sincerely,

Keith F. Voos, Chair,
Health, Education, Energy & Pollution Subcommittee,
Environmental and Climate Justice Committee,
New Jersey State Conference – NAACP