



2200 Atlantic Street, 6th Floor Stamford, CT 06902

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**New Jersey Board of Public Utilities**

44 South Clinton Ave, 1st Floor  
PO Box 350  
Trenton, NJ 08625-0350

Dear Staff of the New Jersey Board of Public Utilities (“BPU” or “Board”),

Altus Power, Inc. is a publicly listed operating company that develops, funds, owns, and operates distributed generation solar and energy storage projects across the U.S. We appreciate the opportunity to provide comments to the Board as it continues to grow the Community Solar Energy Program in New Jersey.

**Question 7.**

The method of selection used in pilot years one and two has been fair and transparent. A first come-first serve approach has failed in many states where robotic applications, clogged utility IX queues, oversubscription by single developers, and long waitlists have hindered community solar development. Altus recommends continuing the New Jersey Board evaluation criteria with the following additional requirements.

**A refundable bid deposit for each project could help reduce frivolous applications and allow the board to expedite review.** This would be similar to other Board programs in offshore wind etc. This deposit could be **refunded if/when the project reaches PTO.**

Although community outreach was advantageous to ensuring the project was participating in the community, Altus would like to clarify to the board the amount of confusion this creates. Community based outreach criteria confused many residents by telling them a solar project was coming and asking them for signatures, but they were not obligated to actually pay for anything or sign up for anything yet. Further, the project and benefits being pitched to their organization and community may never materialize if the project is not selected, or will be there a full 2 years later.

Further to this point, criteria about the viability of the actual solar project could be more effective in the board’s goals of creating solar in the program in NJ. **For example in other states a Building Permit is required.**

**Question 8.**

Altus’ experience in other waitlists is that projects that sit on a waitlist become more likely to be “scrub” projects, and clog up the queue for future legitimate projects. A waitlist could also prevent future sites (i.e. future NJ warehouses that will be built solar ready but do not exist today) and companies from participating in NJ’s community solar program if they see hundreds of projects ahead of them in the queue with no certainty as to when their proposed project will be considered.

Altus would also recommend bi-annual (two times per year) application periods to allow for projects to apply when they are truly ready, discouraging applications that are premature from being faced to force an application early by the once per year deadline or have to wait another full year before the next



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application period. **Bi-annual application and approval periods will reduce the number of applications that staff has to consider and will also reduce the time it takes to select the most worthy projects to recommend to the Board for approval. This will also allow projects to move from application to approval and continued development faster without an 8 month holding period as in the pilot program.**

**Question 12.**

Expanding the verification standards to ensure verification process is not the barrier to legitimate LMI participation should be emphasized. **To that end Altus supports additional methods of verification such as Medicaid and self-attestation.**

Thank you for your time and consideration.

Sincerely,

*Matthew Marlow*

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