

Association of NJ Environmental Commissions (ANJEC) ▪ Bethel-Hosanna AME Church
Community Action Service Center, dba Rise ▪ Delran Township Green Team ▪ Evesham Green Team ▪ Greener
JC Iglesia El Remanente de Dios ▪ Jewish Community Center of Middlesex County ▪ Montclair Climate Action
Morris Habitat for Humanity, Inc. ▪ Native American Advancement Corporation
New Jersey League of Conservation Voters ▪ New Jersey Policy Perspective
New Jersey Sustainable Business Council ▪ Newark Science and Sustainability Inc. ▪ NewBridge Services
NJ Conservation Foundation ▪ St. George & St. Shenouda Coptic Church ▪ St. Luke's Episcopal Church
The Supportive Housing Association of NJ ▪ Triple C Housing Inc. ▪ United Community Corporation
United Methodist Church of Bound Brook

**Re: Request for Comments in the Matter of the Community Solar Energy Program
Docket No. QO22030153**

May 6, 2022

Dear Secretary Diaz,

The Community Solar Energy Pilot Program has made New Jersey a nationwide leader in the fight against climate change and in bringing clean energy to low-income and moderate-income households. However, the continued success of New Jersey Community Solar could be jeopardized by changes that would limit its long-term effectiveness.

As stakeholders in New Jersey Community Solar and in the state's clean energy future, we believe the three major components outlined below are essential to the Program's continued success. Not only do these recommendations move our clean energy goals forward, they also lead to job training and workforce development, which are critical for New Jersey's economic development and clean energy economy.

1. To ensure that community solar projects maximize the benefits to New Jersey communities, the BPU should continue to award projects through a competitive scoring process.¹

The BPU's process of selecting community solar projects through a competitive scoring rubric incentivizes solar companies to compete for partnerships and collaboration with nonprofit organizations and community groups in ways that creatively maximize the benefits for New Jersey residents (particularly LMI households). To date, New Jersey communities have been direct beneficiaries of discounts and other perks from solar companies wanting to win over customers and to score points in this competitive application process. Switching instead to a "first-come-first-served process" would reduce or eliminate the incentive for companies to maximize benefits and to creatively collaborate with our communities.

¹ Response to Question #7 in BPU's Public Notice dated April 11, 2022.

Relatedly, New Jersey's residents can only benefit from community solar projects that are ultimately built, turned on, and subscribed, so awarding feasible projects and rejecting infeasible projects is key to the Program's continued success. The BPU's competitive selection process enables deliberate selection of feasible projects and rejection of infeasible projects. Shifting instead to a "first-come-first-served" selection process would ultimately lead to fewer operational projects and, thus, fewer benefits for our communities.

2. To reduce barriers to clean energy for LMI households, the state should allow people to qualify as "LMI" by self-attesting to their qualifying income levels.²

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. And we have no reason to believe that households in our communities will lie about their income levels to qualify for slightly higher electricity savings.

To address the potential – however slight – of fraud, energy companies that benefit from community solar should be made to bear that risk (e.g., by posting security deposits to be drawn in the event of fraud), rather than requiring LMI residents to bear that burden.

New Jersey is leading the country – by a long shot – in effectively requiring community solar projects to sell at least 51% of their electricity to LMI customers. Such an ambitious and important LMI requirement must be combined with a realistic method for verifying LMI status.

3. To support New Jersey's clean energy goals and to position it as a national leader, the Board should award at least 300 megawatts of community solar capacity for the next application round.³

Our global climate crisis – and our clean energy economy – demand urgent and sweeping action. The state has an admirable and ambitious goal to reach 100% clean energy by 2050, and community solar projects are the most immediate, realistic way to connect large-scale solar to our electric grid.

The good news is, based on the 410 applications for more than 800 megawatts in project capacity that the Board received in year two of the Pilot Program, solar developers are clearly prepared to do their part in propelling New Jersey toward its clean energy mandate. The concerning news is that our community solar program is a year behind schedule. To get the program back on track, the BPU should award 300 megawatts (instead of 150 megawatts) of projects from the next application round. This would require no additional budget or resources from the BPU and would double the cost efficiency of the BPU's review process.

² Response to Questions #11 and #12 in BPU's Public Notice dated April 11, 2022.

³ Response to Question #1 in BPU's Public Notice dated April 11, 2022.

The U.S. government and our neighbor states are rapidly forging ahead on community solar. In March, New York Governor Kathy Hochul announced that the state has installed more than one gigawatt of community solar projects. In October, the U.S. Department of Energy set a new target for community solar to power the equivalent of five million households by 2025 and to create \$1 billion in energy bill savings.

In the fight against climate change, the stakes are high, but the benefits are monumental, and we want to capture those benefits in New Jersey.

By ensuring quality projects and incentivizing maximum community benefits through a competitive application process, reducing barriers for LMI residents, and growing New Jersey's community solar program to meet demand, we can leave a legacy of equitable clean energy infrastructure that serves the Garden State for generations.

Together, with the recommendations above, we look forward to accomplishing this with you.

Yours in clean energy,

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Tyrese Gould Jacinto, President and CEO, Native American Advancement Corporation

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Tobias Fox, Managing Director, Newark Science and Sustainability Inc

Michelle Borden, CEO, NewBridge Services

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