

From: [Channell Wilkins](#)
To: [Secretary, BPUBoard \[BPU\]](#)
Cc: [Lieutenant Governor, Sheila Oliver \[DCA\]](#)
Subject: [EXTERNAL] Re: Community Solar Program comments
Date: Friday, May 13, 2022 12:36:37 PM

I would like to request a meeting about implementation of community solar. Who at BPU would you suggest ?

As previously noted, Ocean Inc. fully supports the Community solar program, however, in order to be proactive and have the program meet it's goals quickly, we have suggestions and comments derived from our interaction with LIHEAP/USF clients and Solar companies wishing to participate. I did not feel these type of comments were relevant for the permanent programming policy, "The road to hell is paved with good intentions" so when implementation concerns are not vetted programs well-meaning stumble along rather than quickly meet their intended objectives.

One of our top concerns is that the new solar providers or their agents are registered vendors for the LIHEAP and USF programs. We have already seen hesitancy from clients that despite the desire to go green, they are uncomfortable that we cannot assure them that the solar programs will be an eligible LIHEAP/USF vendors. To entice them with clean energy options with savings but possibly eliminate their LIHEAP/USF payment is counterproductive to the overall goals of the Solar program and getting client registered. The savings from solar need to be supplemental to the program eligibility in order for LMI clients to fully see the benefits of solar.

As we reduce the carbon footprint and create environmental changes these programs will still be needed as a bridge for low-income households. These programs are historically underutilized and the introduction of solar could be a means to attract more individuals to both programs. LIHEAP/USF could serve as a post verification tool for Solar subscribers who qualify under the 50% usage threshold and provide additional outreach options for both programs.

Additionally, we would like to see the same level of cooperation and access granted by current utility agencies be part of the onboarding for solar companies or their agents (access to accounts online and liaisons to troubleshoot concerns et al).

We recognize DCA as the LIHEAP provider needs to be involved as well. Hopefully by addressing potential barriers early we can model an effective and robust implementation and speed up the use of clean energy.

I look forward to the opportunity to discuss implementation.

Channell Wilkins
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From: Lieutenant Governor, Sheila Oliver [DCA] <Sheila.Oliver@dca.nj.gov>
Sent: Thursday, April 28, 2022 1:32 PM
To: Channell Wilkins <cwilkins@oceaninc.org>
Subject: Re: Community Solar Program comments

Nice.....

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From: Channell Wilkins <cwilkins@oceaninc.org>
Sent: Thursday, April 28, 2022 12:58:44 PM
To: Secretary, BPUBoard [BPU] <Board.Secretary@bpu.nj.gov>
Cc: Beth Hudson <bhudson@oceaninc.org>; Lieutenant Governor, Sheila Oliver [DCA] <Sheila.Oliver@dca.nj.gov>
Subject: [EXTERNAL] Community Solar Program comments

April 28, 2022

Reference: Community Solar Program rules

To Secretary Board of Public Utilities,

I am writing on behalf of the O.C.E.A.N Inc. to support the Community Solar Energy Program and its transition to a permanent Program. Clean energy should be made easily available to low-income households who need the savings most.

As the Community Action Agency for low to moderate income residents throughout communities in our service area, O.C.E.A.N., Inc.'s mission is the delivery of quality, comprehensive services that improve the quality of life of individuals and families and assist them in moving toward self-sufficiency. Ocean Inc. is also the Low-Income Home Energy Assistance Program grantee (LIHEAP) for Ocean and Atlantic Counties.

Community solar has already brought lower utility costs, cleaner air, and workforce development to marginalized communities. This is a great support for our LIHEAP clients and helps us expand the services to households. 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 expects to see 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. Having a LIHEAP agency partnership with prequalified households should enhance an applicants scores. This will allow my organization's constituents to be 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 more community solar.
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). Those that have proof of eligibility for enrollment in publicly funded low-income programs should be categorically eligible, asking for more deters residents from wanting to sign up for the community solar program. Many of whom are older and easily frustrated by increased bureaucracy and then fail to complete eligibility.

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

Sincerely,

Channell Wilkins

Chief Executive Officer

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