



New Jersey
Progressive
Equitable
Energy
Coalition

May 15, 2023

To: NJ Board of Public Utilities re: Docket No. QO22030153

Thank you to the Board of Public Utilities (BPU) for your work crafting this proposal for public consideration.

My name is Nicole Miller and I'm a member of the Newark Environmental Commission, Chair of the Newark Green Team and Vice-chair of the NJ Progressive Equitable Energy Coalition (NJPEEC). We appreciate and support BPU's plan to initiate a permanent community solar program. Many residents in Newark are excited by the prospect of being able to power their homes and businesses with renewable energy even if they are renters or have unsuitable rooftops.

We support the increased minimum capacity and efforts BPU staff have made to ensure capacity is maximized or can roll over from one year to the next. We caution BPU staff to monitor projects promising higher discount rates in order to break a tie. Projects should be very clear about how they intend to afford any discounts they offer. Additionally, BPU should be monitoring applied discounts and have some consequence for failing to meet stated discount goals. Additional suggestions for ensuring project readiness include making sure projects have already secured an executed Engineering, Procurement and Construction contract. To avoid a race to the bottom, we'd suggest an alternate method of tie breaker rather than higher discounts that cannot be substantiated.

We are also very pleased with the announcement of consolidated billing. This has been a major hurdle in getting residents comfortable with the program. We do not recommend third-party billing as the requirement of automated payment is an immediate turn-off for residents and business owners concerned about not being able to actively manage their payments. We encourage BPU to initiate consolidated billing as quickly as possible and process payments and discounts through utilities.

Efforts by BPU staff to prioritize access for low- and moderate-income residents is commendable and a continuation of the excellent work begun by launching the Community Solar Project Finder which took much of the confusion and guesswork out of researching and signing up for projects. The self-attestation option is another important step in making these projects accessible for low- and moderate-income (LMI) residents.

Similarly, the opt-out automatic enrollment component is a great element of the proposal as many residents are unconcerned with where their energy is generated yet will appreciate the associated discounts while NJ benefits from increased reliance on renewable energy.

That said, we recommend BPU add the prioritization of municipalities with 35% or higher LMI populations as a primary goal for the automatic enrollment component to further ensure projects will target LMI residents. Focusing this option on those communities with the highest LMI populations in addition to making sure projects are situated (or preferred to be situated) in the same or adjacent communities as the contract will help ensure equity in access to solar.

Throughout the document, we had questions about what enforcement methods BPU will engage to ensure projects are as efficient as possible and that all proposed discounted savings are applied. How will BPU ensure projects are administering the promised savings off electric bills, securing 51% or more of their project allocation towards LMI residents, and distributing payments and direct benefits from the program to residents in housing authority buildings? We recommend BPU work with housing authority agencies to develop projects that can be done with the savings to further help with the safety, comfort and quality of life for residents when a direct benefit is not feasible.

Community engagement is essential to this program and we are concerned that engagement requirements have been greatly reduced from the pilot program to the permanent program. Where are the incentives for project partners to be engaged in local communities as part of their project? Some companies have used the pilot program to develop relationships with the community, educate residents and develop workforce opportunities. These should continue to be required (and valued) elements of the permanent program (and the automatic enrollment program). We support instituting a point system as part of the application process to help determine the project developer's commitment to community engagement and workforce development.

Thank you for the opportunity to provide feedback.

If there are any questions, I can be reached at Nicole@MnMConsulting.biz.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Miller". The signature is fluid and cursive, with a large initial "N" and "M".

Nicole Miller, Vice-Chair
New Jersey Progressive Equitable Energy Coalition (NJPEEC)