



May 15, 2023

New Jersey Board of Public Utilities
P.O. Box 350
Trenton, NJ 08625

SUBJECT: Comment to the Proposed Community Solar Permanent Program (Docket No. QO22030153)

President Fiordaliso, Members and Staff of the New Jersey Board of Public Utilities,

New Jersey's sustainable business leaders are poised and committed to helping to lead New Jersey's transition to a more just and sustainable clean energy economy. New Jersey's nation-leading community solar program is a vital part of successfully actualizing the state's ambitious clean energy goals. The New Jersey Sustainable Business Council submits these comments in response to the Community Solar Permanent Program draft rules.

The permanent community solar program should:

- Promote meaningful community engagement. New Jersey's community solar program has the potential to be a major catalyst for environmental justice, but the proposed permanent program significantly reduces community engagement in the applications. The final program should maintain a version of the pilot program's objective, points-based scoring system. Project applications could solicit letters of support from community organizations or resolutions from municipalities as evidence of that engagement. Not only is this good for New Jersey communities and environmental justice, it also encourages strong connections between the state's businesses and the communities they serve.
- Avoid promoting "ghost projects" – community solar projects that ultimately do not get built due to financial considerations. The proposed tiebreaker would award projects based on the bill discount rate. This provision has the potential to encourage applicants to propose discounts that could get approved but wouldn't make financial sense for the developer in the long-run, creating the risk of unfinished projects and unused but allocated capacity within the program.

· Encourage continued and increased capacity for community solar. When our clean energy economy grows, we all win and we leave future generations of New Jerseyans with an infrastructure that helps to mitigate the risks and costs of climate change while enhancing air quality.

As has often been the case, New Jersey is leading the nation – both in sustainability and promoting business growth. We have another opportunity to continue this momentum with the strategic expansion of community solar, which is why the above recommendations are important to implement.

Thank you for your consideration.

Sincerely,

Richard Lawton
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