



May 15th, 2023

To Whom It May Concern,

Sustainable Jersey City is a catalyst organization whose mission is to educate, empower and activate community stakeholders, to make Jersey City and the region a more sustainable and resilient place to live and work. We leverage community assets to create programs that increase community knowledge and engagement, support existing sustainability initiatives, and enable systemic change from the grassroots level. As an organization, we are committed to environmental, economic, and social justice.

As an organization, we have been a supporter of New Jersey's community solar program from the start. We thank the Board for its concerted focus on environmental justice and for enabling bill consolidation in the permanent program. However, we are concerned that some other proposed changes could exclude the very communities in which the program was designed to help.

First and foremost, we are acutely concerned that when new community solar projects are developed in Jersey City, our residents will be bypassed for subscription when Jersey City residents should be the primary beneficiaries. As the second largest city in NJ with close to 300,000 residents, the majority of whom live in multi-family unit dwellings and rent, there are more than enough Jersey City residents in need and deserving the financial and environmental benefits associated with community solar. If there are no protections or provisions put in place to ensure local communities where projects are developed will have the first opportunity to subscribe, then the program will inadvertently hurt to the very environmental justice communities it was designed to uplift. We urge the Board to implement at least one such protection – to **only allow anchor subscription or “opt-out” for affordable housing providers or other residential entities in the city or neighboring city where the project is located.** By limiting opt-outs to the project “host” communities, the Board will ensure the program is fair and brings economic benefit to local “host” residents and not those in less industrialized communities across the state.

We are similarly concerned that there will not be enough successful or completed projects so that all Jersey City residents and our neighbors can benefit in the short and long term. We fear that developers will over-promise extremely high discounts to win projects without the ability to deliver on them. While we of course hope for the highest savings possible for Jersey City residents, especially low-income folks who spend a disproportionately higher percentage of their income on utilities, we are very skeptical that higher proposed discounts will equate to a real project that residents can begin subscribing to since there are no definitive measures for financial or construction



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accountability. We want to see projects that are realistic and will be built, and not take up space in the program as many unsuccessful developers did in the pilot program. Therefore, we recommend that a uniform, meaningful discount be recommended by the Board. Moreover, we recommend that developers be required to pay a large deposit for their application so that developers do not promise a high discount that they cannot deliver. Most importantly, we strongly assert that **objective evidence of community support should be a key or ideally deciding factor for approved applications.**

In other words, there should be proof of *community* support for *community* solar. As a community-based organization, we are alarmed by the vagueness outlined on page 26 of the Straw Proposal for community engagement plans. We are proud that New Jersey has the highest proportion of low-to-moderate income subscribers for community solar nationwide. This was achieved in large part because of sincere and objective community engagement and support with organizations like ours who are trusted community voices and leaders. As the Straw Proposal is currently written, developers can write in their plan that they plan to engage with us, and even list our contact information that is publicly available online, without any follow up or requirement to follow through on their word. **Developers should be required to demonstrate proof of community support through formal letters of support and city resolutions.** Especially with large capacity opt-outs, they may never actually have to engage whatsoever with community partners and elected officials in the city that the project is sited. New Jersey communities, especially environmental justice communities, deserve more than a fluff “philosophy statement” on how developers will promote community benefits, without any oversight or follow-up. We recognize that it would be difficult for the Board to monitor engagement, so that is why it *must* be proven from the outset in applications. To deviate from this would ensure no meaningful collaboration with the surrounding community would take place as posed in Staff Question #24.

We thank you for your work on the community solar program thus far and hope you will thoughtfully consider these recommendations. We remain committed to the success of the program, and its potential for sincere economic, environmental, and social justice.

Sincerely,

A handwritten signature in black ink, appearing to read 'Debra Italiano'.

Debra Italiano - Founder & Chair Sustainable Jersey City (SJC)