



May 12, 2023

Jonathan Abe
Chief Executive Officer
Sunwealth Power, Inc.
2067 Massachusetts Ave, Suite 540
Cambridge, MA 02140
Phone: +1 (617) 752-7322
Email: jon@sunwealth.com

Sherri Golden
Secretary of the Board
44 South Clinton Ave., 1st Floor
PO Box 350
Trenton, NJ 08625-0350
Phone: +1 (609) 913-6239
Email: board.secretary@bpu.nj.gov

Dear Secretary of the Board Golden,

Sunwealth Power, Inc. is a public benefit corporation that develops, finances, owns, and operates commercial-scale solar projects in New Jersey. Sunwealth believes that the solar energy economy should be inclusive and expansive, and it is grateful that the New Jersey Board of Public Utilities shares this vision. Sunwealth thanks the New Jersey Board of Public Utilities for the work it has done to grow and democratize the clean energy economy, and it appreciates the steps that the BPU is taking to continue supporting solar energy development with the permanent Community Solar Energy Program (“Permanent Program”).

The Sunwealth team has carefully reviewed the CSEP Proposal released by the BPU and it humbly submits the following comments:

Primary Recommendations:

Section II: Application Process and Project Selection

Sunwealth proposes a separate funding tranche reserved for projects under one megawatt to ensure that capacity in the Permanent Program is not granted to a relatively small number of large projects. Sunwealth has experience developing more than 10 Community Solar projects on dual-purpose commercial space, including at the Blue Army Shrine in Franklin, NJ, and believes that these impactful projects deliver meaningful environmental and communal benefits.

Under this condition, Sunwealth supports Option 2 for Project Selection, as this has garnered success in other states’ development of compliant Community Solar programs and efficient deployment of impactful projects.



Sunwealth encourages the loosening of project maturity requirements, particularly the permit and Interconnection Agreement submission requirements, as they pose an excessive burden on the development process and may have an adverse effect on deployment efficiency.

Section III: LMI Access

Sunwealth requests that the BPU provide the required eligibility documentation templates for LMI self-attestation and Affordable Housing master-metered affidavits.

Sunwealth suggests that should the BPU conduct annual LMI compliance audits, the BPU deliver further guidance regarding cadence, submission forms, process, etc.

Section IV: Bill Credits

Sunwealth advocates for a strict reporting process for utilities with monthly data on each subscriber's kWh usage, kWh credits allocated, \$ value of credits allocated, kWh credits banked, and total banked dollar and kWh amounts.

Sunwealth also requires host array statements with subscriber percent allocation breakdowns, host banked balance(s), contributions and withdrawals.

Sunwealth proposes accrual of interest on utility payment to project owners if the payment is more than one month outstanding. This would effectively incentivize on-time payments by the utility company under a consolidated billing process.

Affirmations:

Sunwealth supports the implementation of a consolidated billing process as an improvement to the customer experience (contingent upon the utility compliance noted above).

Sunwealth supports subscriber eligibility based on their location in the project's EDC territory without additional adjacency requirements.

Sunwealth supports the requirement of monthly utility credit allocation reporting based on both kWh and \$ values.

Sunwealth supports the implementation of a first-come first-served application process with a discount based on the size of the LMI subscriber discount.

Sunwealth supports automatic enrollment for both municipally-owned AND third-party owned community solar projects (assuming this is the existing design).

Additional Recommendations:

INVEST IN THE FUTURE OF ENERGY

2067 Massachusetts Avenue, Suite 540
Cambridge, MA 02140

hello@sunwealth.com
617.752.7322

[sunwealth.com](https://www.sunwealth.com)



Question 23: Sunwealth suggests individuals enrolled in other public assistance programs may likely be candidates for automatic enrollment, such as fuel assistance, discounted utility rates, LIHEAP recipients, public/Section 8 housing, etc.

Question 24: Sunwealth proposes the inclusion of a target local acquisition metric (x% of project capacity) will be filled by area residents and/or (y # of local partners/campaigns) will be used to engage potential subscribers.

The team at Sunwealth appreciates the BPU's consideration of our comments. Sunwealth hopes that these comments contribute to a Permanent Program that builds a democratized and far-reaching solar economy in New Jersey.

Sincerely,

Jonathan Abe
CEO, Sunwealth Power