SHA

SECAUCUS HOUSING AUTHORITY

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May 15, 2023

New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625

Dear New Jersey Board of Public Utilities,

The Secaucus Housing Authority has a six-story, 100-unit building that is master metered. From 2019 when the community solar program first began to present, our Authority wanted to subscribe to a local community solar project. We ultimately could not subscribe because we were told by developers that they do not receive enough of the bill credit from the utility to make subscribing our master meter viable.

We were hopeful that the master meter bill crediting would improve in the permanent program so that all SHA residents can finally benefit, but we are told by developers that the Board's proposed credit increase will not be high enough to be possible long term compared to the significantly higher credit afforded to individual residential meters. This is exceptionally disappointing to us and antithetical to the program's goals since there are seven projects owned by three different developers located within our municipality, and several more projects and in neighboring North Bergen, Newark, and Jersey City. The community solar program was designed to ensure that the benefits of solar energy would be accessible to all, but the proposed master meter crediting would continue to exclude many affordable housing residents.

Additionally, if we were able to subscribe, it would be difficult to pass on 75% of savings to our residents in the form of direct payments. An affidavit demonstrating that the savings would be passed on through facility upgrades would continue to not only suffice but also incentivize public and affordable housing participation in the program. I can confidently say as an Executive Director and as a trustee on the New Jersey chapter of the National Association of Housing & Redevelopment officials that capital improvement costs will continue to be the most significant financial burden on New Jersey's aging public housing stock; allowing 100% of the savings to go towards these projects would assuredly ease this burden and improve the living situation of public housing tenants.

Thank you in advance for considering our experience and recommendations, and for the Board's commitment to ensure no LMI residents in eligible community solar communities are excluded from the program.

Sincerely,

Christopher Marra

Executive Director