

Dear New Jersey Board of Public Utilities,

The Millville Housing Authority is located in one of the most distressed counties in New Jersey. We service 494 public housing units. The majority of our residents are seniors who are on limited, and fixed incomes.

As an affordable housing provider, we would like to first express our gratitude to the New Jersey Board of Public Utilities for the good work and effort you are making in ensuring the community solar program is accessible to affordable housing providers and meaningful to our low to moderate income residents. There is, however, a significant risk that the program may not succeed in meeting its goal of ensuring residents of master-metered affordable housing are able to access the benefits of the program due to two specific issues.

We have master meter affordable housing projects that were not able to be subscribed in the community solar program's first two years. We were told by developers that is because they do not receive enough of the bill credit from the utility to make our projects viable. We are also told that even with the proposed changes in the straw proposal our master meter projects are still not viable. The bill crediting that developers receive based on the straw proposal will still be too low to consider our projects. We need this relief for our residents and failure to properly address this issue will ensure the exclusion of a segment of low- and moderate-income households cannot participate in the "access for all" benefits that community solar promises.

Setting the value of the community solar bill credit too low will continue to disincentivize community solar system owners and subscriber organizations from seeking master-metered affordable housing subscribers because they will lose too much revenue. In Millville, even though the solar company we were working with had plenty of low- and moderate-income spots available on their project, they were unable to accept our master meter and allow us to offer the affordable rates across all of our Housing Authority tenants.

We urge the Board to make the necessary changes on bill credit as it relates to capacity and demand charges to make master meter, affordable housing projects a feasible option for community solar developers to subscribe. Moreover, although these changes will still not make master meters projects as valuable to developers, it will at the very least allow them to provide our tenants with a meaningful discount and consider us as a subscriber option. Again, let us consider the "access for all" intention of the program when making these crediting decisions.

Thank you for considering our suggestions. We appreciate the hard work and the commitment of the BPU to ensuring that the Community Solar program benefits *all* New Jersey residents.

Sincerely,

Samantha Silvers  
Millville Housing Authority