

Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08609

May 12, 2023

To Whom it May Concern:

Regarding Section #21 on page 24 of the Straw Proposal, please consider the following:


In the Straw Proposal's model, a community solar installation sited on a warehouse in an industrialized and/or relatively low-income municipality could benefit solely residents in a non-industrialized and/or wealthier town on the other side of New Jersey, as long as that other town is within the same EDC territory. We had two large community solar projects built in our community of Perth Amboy. It appears that if the Straw Proposal is accepted as currently written then a project like ours, built and for the benefit of marginalized communities, could serve a community in Somerset County. That is the polar opposite of environmental justice.

An opt-out community solar project should bring its economic benefits to the people in the community hosting that project, not to people living on the other side of the state. The BPU should limit "opt-out" to either the town where the community solar project is located or an adjacent town within the same EDC. This would ensure a project is not sited in an underserved community for the exclusive benefit of a wealthier one. It will also ensure that the solar developer continues to conduct meaningful community engagement.

- The Board should also carefully consider the use of a discount off the bill credit to customers as a tie breaker. This simply requires a developer to make unrealistic promises to get a project approved. Once the project is approved and time passes and the project is not financeable, the developer will go back to the Board for an exception. If the exception is not granted, the Board will have a lot of uncompleted projects. This happened in other states and could be the death knell of the program in New Jersey.
- Finally, we were surprised to see no meaningful attention paid to community engagement in the straw proposal. Community based organizations (CBOs) and the people we serve are the organizations that should most benefit from community solar. We are also in the position of being able to help developers direct their efforts for subscriptions and future development opportunities. By not insisting on evidence of community engagement from developers, other than a short story of what they *intend to do*, the Board minimizes the importance of CBOs, and marginalizes our place in the community solar program.

We recommend the Board consider tie breakers that revolve around workforce development, subscription partnerships with CBOs, education and training for students, *and* a meaningful discount for subscribers.

Very truly yours,


Sherri Goldberg, Director of Community Services



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