GREEN STREET POWER PARTNERS
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To Whom It May Concern,

Green Street Power Partners (GSPP) appreciates the opportunity to provide comments to the New Jersey Board of Public Utilities (The Board) on the straw proposal of the Permanent Community Solar Program Proposal. GSPP thanks the NJBPU for putting together such an extensive and well thoughout straw proposal, as well as NJBPU's continuous commitment to stakeholder engagement throughout this CSEP process.

GSPP is a financier, developer, operator, and long-term owner of distributed generation facilities across the country. With over 80 MW in various community solar markets, we have a wealth of knowledge on the successes and shortcomings of different state programs. Green Street is excited to see the future of New Jersey community solar come into fruition. Below please find our submitted comments in response to the Board questions and proposal; we submit these in hopes that these changes, additions, and questions can help the program have the greatest opportunity for success.

- **Tie Breaker**

Under the current method of project enrollment, a tie breaker is an inevitable outcome. With that in mind, evaluation based on highest overall discount could see lower savings for LMI off takers. From a public policy perspective, it makes the most sense to judge projects based on the highest discount rate to LMI community members and set a minimum 10% discount rate for all other customer classes. For this methodology to be enforced EDCs should certify they will be able to support a consolidated billing mechanism that allows for multiple discount rates immediately upon net billing's implementation.

Additionally, if a tie breaker methodology is approved, a developer cap should be implemented based on the percentage of the Energy Year Allocation. This will allow for greater project and developer diversity and allow for greater renewable penetration across the state. This developer cap should align with the program selection rules of highest discount and utilized to allow for equity amongst developers.

- **Project Maturity**

While Green Street supports the high project maturity requirements, greater clarification is needed on permitting requirements for rooftops. Since rooftop solar systems do not require the same extensive non-ministerial permitting as ground mounted projects, the board must specify what is needed for rooftop projects to satisfy permitting requirements. If the Board fails to specify, rooftop projects will be denied selection into the permanent program. In our experience rooftop systems often only require a building permit or building plus electrical permit. Both these permits require the submittal of IFPs which are created once equipment has been finalized and an EPC procured. This level of maturity is costly and could damage relationships with EPC partners. For rooftops we instead recommend interconnection, structural report to prove that the rooftop can support the load, site control, and preliminary engineering maturity requirements up to the discretion of the board.

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Additionally, the requirement of a subscriber acquisition plan with an identified subscriber organization requires increased clarity to account for potential changes in the plans throughout the projects development. While GSPP is in support of an initial plan, The Board needs to provide flexibility and leniency in case this plan is to change. A project's subscriber organization is likely to change prior to the project coming online which would likely result in different acquisition plans; and we strongly urge The Board to allow for the submission of changes to the plan without penalty.

- **Community Engagement Plan (Questions 21 and 24)**

The current Community Engagement plan requirements provide a framework for a project's intended commitments to the community, but it is crucial to establish stronger safeguards to ensure active community collaboration and participation in the project. Given the potential for projects to attract subscribers from across an Electric Distribution Company, community engagement efforts should prioritize community education. It is imperative that the surrounding community and vulnerable community offtakers perceive subscriber organizations and project details as accessible and receptive to interactions. To achieve this, projects should provide informational tools for potential subscribers and make them publicly available. These tools could include, but are not limited to:

- Fact Sheets: A single-page presentation outlining key project facts.
- FAQs: A list of frequently asked questions about the project, which will be updated throughout the project's lifecycle.
- Website: A web presence is essential to maintaining contact and providing comprehensive project information, including project facts, contact information for subscriber organizations, and FAQ pages.
- Postcards/Mailers: Invitations to information sessions or alerts about construction can be sent out to the community to inform them about how to subscribe to the project or learn more about the opportunities.

In addition, projects could host drop-in events or exhibitions for community members to learn more about the project. These meetings could be an informal and non-confrontational environment for project developers and subscriber organizations to explain project details, construction timelines, and contact information. They could also use these meetings to address community concerns and determine best practices for engagement before and during construction.

To ensure community involvement, community engagement plans could also include the community organizations-- such as nonprofits, multifamily housing buildings, and municipal accounts-- as off takers if they are within the utility territory.

While these suggestions are not exhaustive, they represent a starting point for easy and accessible ways to ensure community education and engagement

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- **Net Crediting**

While not asked by the Board, Green Street Power Partners feels it is essential to comment on the inclusion of net crediting and voice support for its implementation in the permanent program. Net crediting simplifies billing for the project owners, but most importantly for subscribers. Net crediting allows subscribers to best understand how their bill is benefiting from their subscription.

It would be amiss if New Jersey did not learn from the implementation of Net Crediting in New York. New Jersey utilities should be able to certify they will allow for multiple discount rates within net billing from the start to avoid delayed implementation. Net crediting in NJ should undergo substantial testing and potentially implement a phased or intermittent roll out to prevent issues in the process affecting all customers across the entire state. In the same vein, net crediting should be optional. To ensure the utilities are prepared to efficiently manage net crediting and support customers enrolled, penalties should be applied to the EDCs for billing issues and should be a part of the creation of the net crediting plan with the BPU. New York utilities are currently in midst of deploying ther net billing program as well as undergoing an extensive Negative Revenue Adjustment docket with the NY Department of Public Service. To prevent this from occurring in New Jersey, penalties should be built in to initial design.

Furthermore, the Board's straw proposal states that subscribed credits will carry over monthly until the end of the subscription period or until the account is closed, at which point subscribers will be compensated at the EDCs avoid cost of wholesale power. This arrangement will undoubtedly have a significant impact on project revenues. Since Community Solar providers have no control over a customer's decision to move, terminate their subscription, or close their account, the notion that banked credits will only be compensated at the avoided cost rate would create an inequitable outcome that must be addressed.

To avoid this negative impact, New Jersey should adopt rules like those in New York regarding banked credits. Specifically, any excess credits remaining in a subscriber's account at the time of account closure, termination, or removal from the allocation schedule should be transferred back to the host account at their full value and distributed to other subscribers. This approach would promote fairness and equity for all Community Solar stakeholders.