

Community Solar Straw Proposal Feedback

Isles is a community-based organization operating in the Trenton area for 41 years with the mission of fostering self-reliant families and healthy, sustainable communities. Our services include job training and education, affordable housing and business development, financial counseling for local families, lead paint remediation, as well as critical work concerning energy efficiency, weatherization, electric vehicles, and supporting Community Solar projects.

We applaud the Board's consideration and inclusion of previous stakeholder feedback, as well as lessons learned during the pilot program. We would like to offer our insights as a community development organization seeking expand equitable access to community solar and clean energy. Given the challenge with deploying solar to residential roof tops in urban communities, we are keenly interested in seeing the community solar program succeed in delivering real savings to urban residents. Their utility payments are helping to fund these programs and it is important that they have effective and meaningful access to the solar program.

We see the Community Solar program as the most effective way to engage, when done correctly. Creating supportive pathways to ownership or control over solar projects can dramatically enhance the benefits of renewable energy to those who need the benefits the most.

Accordingly, we offer the following commentary for the Board's consideration of this straw proposal:

1. **Consolidated billing.** We are glad to see consolidated billing included in the straw proposal. Paying two separate bills is one of the most common reasons why low- and moderate-income households fail to enroll or unenroll from community solar programs.

However, based on lessons learned from other states, we urge the Board to add clear and escalating penalties for EDCs that fail to implement consolidated billing in a coherent and timely manner. We must be explicit in the permanent program's design in order to eliminate the possibility of an EDC slowing down community solar deployment.

This is especially important since automatic enrollment cannot be implemented by municipalities until after consolidated billing is in place. Any delay will result in cascading damage to the program, so we urge the Board to be exacting and concrete in its expectations for EDC implementation, and to enforce meaningful penalties for failure to comply.

2. **Real-world Community Engagement.** As-written, the rules for engagement are too vague to guarantee meaningful collaboration. Genuine community engagement requires power being held by both sides. Especially for projects sited in overburdened communities, we urge the board to require developers to explain how community feedback will be meaningfully solicited, and how projects will be modified based on community input. Further, we urge the board to include as a part of the evaluation and scoring process of RFP responses how an applicant will meaningfully engage with local community organizations. We recommend rewarding applicants that demonstrate comprehensive, well-designed and funded initiatives partnering with local organizations for related-purposes, such as job training in "green economy" jobs.

We urge the Board to create programs that allow communities to engage with clean energy technology as they wish. This will unleash a powerful tool for wealth-building in overburdened communities, which have historically suffered the most as the result of our extractive energy system, and have never been compensated for that legacy of injustice.

However, doing so will require a sustained focus on supporting local communities to own and self-determine their energy infrastructure and needs.

- 3. Best Practice.** There are numerous examples of the type of program that should be incentivized to truly build community wealth all around us. For instance, In New York City, the regional Community Energy Co-Op develops community solar within overburdened neighborhoods, and is governed by a co-op board of local residents aiming to create a more just and equitable energy future. Minneapolis is renowned for its community-owned solar model, where arrays are located at community-based organizations in overburdened communities, and members subscribe, save, and own a piece of the power.

Isles points to recommendations from NJ Shines/Vote Solar demonstrating real-world project solutions, and their ability to facilitate such programming using existing models and best practices such as the Sovereignty Grant Program in Illinois.ⁱ

We welcome the opportunity to discuss this further.

ⁱ <https://omb.illinois.gov/public/gata/csfa/Program.aspx?csfa=3055>