

Ms. Sherri L. Golden RMC
Secretary of the Board
New Jersey Board of Public Utilities
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May 24, 2023

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RE: Docket No. AO200604071
Universal Service Fund & Fresh Start Programs

Dear Ms. Golden

Thank you for the opportunity to comment on the above referenced docketed matter. The comments below are intended to assist in that ongoing process to help BPU advance energy assistance programs to low-income customers and to help expand the clean energy economy within environmentally and economically disadvantaged communities.

1. Universal Service Fund

As part of the new BPU permanent community solar program, all electric Universal Service Fund (USF) customers should be automatically opted into the nearest community solar project. This can be accomplished by the BPU on an annual basis for the exact same amount of the electric as provided in within the USF subsidies. BPU could opt-in all USF customers on an annual basis which will allow the BPU to adjust the customer's USF subsidies as the customer income may change over the year.

This automatic opt-in of electric USF customers would lower the LMI acquisition cost for community solar projects, especially for the municipal opt-in program projects. In the municipal opt-in community solar projects, all USF customers in that municipality would be automatically opted-in with no option to opt-out. This would be a neutral impact to USF customers, since they will receive the same exact amount of subsidized electricity as they would have under the USF subsidy except it will now be from a 100% renewable energy source. This will advance BPU energy equity and assistance programs linked to BPU's clean energy equity programs.

At a minimum, the electric automatically annual USF customer opted in process could be on a subscription basis with a set bill savings, but a community solar ownership model will provide the USF customer with greater benefits and a larger stake in the clean energy economy. In addition, a USF opt-in community solar ownership model could allow for reduction in USF costs to the ratepayer, while maintaining the same level of subsidized electricity for the USF customer over time.

In addition, all electric single family homes USF customers should also be provided with a subsidized on-site solar panel installation. This can be accomplished by linking the USF program with the Comfort Partners program. This on-site solar installation should provide the electric USF customer with the remaining unsubsidized electricity needs calculated on an annual basis. This could greatly accelerate the uptake of solar in the LMI community. In this manner, the USF customer would be a community solar customer and have an onsite solar installation for the net unsubsidized electricity usage and have 100% of their electricity needs provided by solar.

Linking the USF Community Solar opted in program with Comfort Partners program could easily upgrade the USF customer to a zero-energy building (ZEB) and jump start the BPU's ZEB roadmap. At the average New Jersey electricity usage and the current solar panel system efficiency, this would be approximately a 3-kW solar system. At the current New Jersey median installed cost for a residential solar system this would be approximately a less than 10 years simple payback.

Since the USF customer basis is larger than the current available community solar projects, the BPU could phase this program in over a number of years as the number and capacity of installed community solar projects increase over time.

Thank you for the opportunity to comment on the Universal Service Fund & Fresh Start Programs. We appreciate all the time and effort that the BPU put into developing this proposal and program and submit the above comments to assist in advancing the States progress towards 100% clean energy goals by 2050 in an equitable manner. Please feel free to contact me on any further follow-up.

Very Truly yours

Michael Winka

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