



# Housing Authority of the City of Millville

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December 11, 2024

Sherri L. Golden  
Secretary of the Board  
44 South Clinton Avenue, 1st Floor  
PO Box 350 Trenton, NJ 08625-0350

Dear Secretary Golden,

Millville Housing Authority (MHA) respectfully offers comments to Docket No. QO22030153, regarding question number nine for issues that should be considered in the one-year Community Solar Energy Program ("CSEP") review.

The MHA provides public housing to low- and moderate-income families, seniors and people with disabilities. Our mission is to provide decent, safe and sanitary public housing to those in need. We maintain 478 apartments in seven apartment complexes and 16 single family homes throughout the City of Millville, New Jersey for low to moderate income people. In total, we offer 494 housing units.

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.

Millville Housing Authority offers the following recommendations as they pertain to the one-year Community Solar Energy Program ("CSEP") review:

**We urge the Board to revise the value of community solar bill credits for affordable housing master-metered subscribers, aligning their credit value with the residential rate class.**

Currently, master-metered affordable housing providers, especially those in Atlantic City Electric like MHA, face significant barriers to participating in community solar programs, often being unable to be brought onto a project due to the insufficient value of our bill credits. For example, our main rate class is AGSS, where ACE's bill credit calculation values the credit at around \$0.07/kWh, compared to ACE's residential service rate of \$0.19/kWh. These values are based on data posted on the BPU community solar website and the experience of developers we have spoken to.

This outcome conflicts with the program's intent to provide clean energy savings to low-and-moderate income households, including affordable housing residents and providers like MHA. We have wanted to participate in local community solar projects from the start of the program and have not yet been able to.

We thank the Board for this opportunity to continue to provide feedback, and for continuing to work towards an equitable community solar program for all.

Sincerely,

Samantha Silvers  
Executive Director, Millville Housing Authority