



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

December 13, 2024

Dear Secretary Golden,

Sustainable Jersey City (SJC) is a catalyst organization whose mission is to empower and activate community stakeholders, who are educated about and committed to environmental, economic and social justice. We leverage community assets to create programs that increase community knowledge and engagement to support existing sustainability initiatives and enable systemic change from the grassroots level. Our Vision is for Jersey City to become the greenest, most sustainable and resilient city in New Jersey, creating an equitable urban environment where everyone who lives and works here is thriving.

One key program that SJC has embraced the past few years to help achieve this mission and vision is the state community solar program. SJC first led education and outreach for the pilot program and now the permanent community solar energy program (CSEP). We see community solar as a key way to help advance clean energy equity for all Jersey City residents, and we look forward to supporting the program goals in earnest at the grassroots level.

SJC respectfully offers comments to Docket No. QO22030153, regarding question number nine for issues that should be considered in the one-year CSEP review. SJC offers the following recommendations as they pertain to the one-year CSEP review:

1. We urge the Board to remove the word “fee” from program terminology. Specifically, the term **“SUBSCRIPTION FEE” must be removed from NJ Clean Energy Program educational materials and from subscribers’ utility bills and replaced by “NET COMMUNITY SOLAR CREDIT.”** This would greatly reduce confusion amongst residents and increase the likelihood that those who need community solar savings the most actually enroll, stay enrolled, and receive lifetime savings. There has always been a significant trust and understanding barrier for residents to embrace community solar; we strongly believe this terminology update is integral to the success of the program – especially to serve low-to-moderate income (LMI) households as hoped.
2. We urge the Board to ensure that residents on equal payment or budget billing plans can participate without any adverse effects, such as paying more monthly. Please ensure that the community solar credit is applied to the budget bill amount due, instead of the underlying balance of the account. This will ensure LMI subscribers will experience savings immediately, instead of waiting a year for their true-up period. It would be a disservice to the goals of the program.
3. We recommend that the board align the affordable housing meter-metered credit value with the residential rate class, so that more community solar developers and subscriber organizations will be able to enroll more affordable housing providers in Jersey City to their projects, and these providers can then in turn pass savings along to their residents directly and indirectly. This would ensure all LMI households benefit from community solar – not just those who individually pay their electric utility bill.
4. We recommend that the Board eliminate the municipal adjacency limitation on community solar Pilot projects. This would further increase the capacity for Jersey City residents to subscribe to more projects and help ensure local projects in Hudson County that were part of the pilot program remain viable for the life of the program.

We thank the Board for continuing to advocate for not only more community solar, but also an improved program that truly allows all NJ residents to understand it and benefit through updated language, increased capacity, and increased access. Thank you for the opportunity to continue to share our feedback and we hope our recommendations are thoughtfully considered.

Sincerely,

Debra A. Italiano
President & Board Member
Sustainable Jersey City