

December 16, 2024

Sherri Golden
New Jersey Board of Public Utilities
44 South Clinton Avenue, 1st Floor
P.O. Box 350
Trenton, NJ 08625-0350

Via email to:

board.secretary@bpu.nj.gov

**Re: Empower NJ Comments to Docket No. QO22030153
Community Solar Energy Program**

Dear Secretary Golden:

Empower NJ is pleased to present these comments in regard to the above-referenced request for comments.

Empower NJ is the state's largest climate coalition (over 100 faith, community, environmental and progressive groups and 100's of thousands of New Jersey members and activists) committed to move NJ off fossil fuels to protect our health and property, grow our economy (clean energy creates more better jobs than dirty gas) and achieve environmental justice by rapidly, and equitably transitioning to a 100% truly squeaky clean renewable energy economy consistent with the science and a safe, reliable, cost effective grid.

Empower incorporates by reference here MSSIA's comments on the same subject being filed this afternoon specifically concerning: 1. Modeling parameters; 2. Cost adjustments; 3. Different incentives for different EDC territories; 4. IRA tax credits and adders; 5. Incentives and tariffs; 6. The influence of the Community Engagement and Subscriber Acquisition Plan; 7. Interconnection issues; 8. Timelines to construct, and 9. LMI participation.

Empower especially calls your attention to LMI participation. Empower concurs that benefitting overburdened communities and LMI households is the most important objective of the Community Solar Energy Program (CSEP) and therefore should do more in its second year to move the program toward greater LMI participation in projects, beyond the current 51% requirement. At 51%, the Program simply will not reach enough LMI households. Further, it should be noted that all of the non-participating LMI households that do not participate must pay slightly more on their electric bills to help fund the substantial discount for the much smaller number of participating LMI subscribers, as well as funding the discount for wealthier subscribers. This can be addressed relatively simply, by incorporating LMI subscribership alongside the percent discount in ranking projects. This will powerfully drive the development community to work towards higher LMI subscribership as a percentage of the total subscribership. It is true that the project owner community has struggled even to meet the 51% requirement, but it is right for those who can do better to get a competitive advantage for doing so. Empower joins MSSIA in requesting *that the BPU adopt a change to the applicant ranking process for CSEP applicants, in which both percent discount and percent LMI subscribership count toward the ranking.*

Sincerely,

David Pringle, on behalf of the Empower NJ Steering Committee
BlueWaveNJ, Clean Water Action, Delaware Riverkeeper Network, Don't Gas the Meadowlands Coalition,
Environment New Jersey, and Food and Water Watch