

--The BPU should set a reasonable plan to grow our solar program over time in order to meet the Governor's 50% clean energy goal by 2030 as well as the GWRA's mandates. The Board should balance the tremendous growth expected for Offshore Wind with that of solar and other Distributed Energy Resources.

--Proximity of project to subscribers is an important determinant of the extent to which subscribers identify with a project. It can also result in an improvement in the health of project subscribers, when community solar is deployed instead of a traditional power generation facility.

--More proximate siting can also result in lower transmission line power loss and a relative lessening of the burden on grid distribution lines so that EDC costs will not unnecessarily be increased and additional RE may still be added to the distribution lines. As the Board is well aware, a number of South Jersey distribution lines cannot now allow any more RE connections due to the solar farms built early in this decade.

--Subscribers should be located within the same service territory and, additionally, within the same or an adjacent municipality, provided that, if the subscribers are in an adjacent municipality, they must under no circumstances be located at a distance further than 25 miles from the project site. However, BPU should retain the authority to grant a waiver from this proximity requirement for a specific project via Board Order if there are reasons that justify the project as in the public interest.

-- In order to obtain the most benefit from the pilot aspect of the program, BPU should create categories for participation in the program based upon the siting of projects, and provide incentives for project development where appropriate. Certain categories should have standardized approval requirements.

— I recommend that (notwithstanding the legislation) neither individual projects nor any co-located group of related projects, be deployed with a capacity in excess of 2 MW. Generally speaking, projects with such capacity require approximately 10 acres of surface area. Projects with capacity in excess of 2 MW would be inconsistent with the need for NJ to preserve its limited open spaces, as well as to site projects in close proximity to applicable subscribers. Subscribers should be able "to relate" to their solar site.

New Jersey is unique: we are the most densely populated state and we routinely vote to preserve our open space and farmland. We are the "Saudi Arabia" of rooftops, e.g. Secaucus big box stores and Exit 8A warehouses. We have many available parking lots & decks. While roof and canopy PV might cost approximately 20% more than ground mounted PV, preservation of our limited farmland, forests and open space is critical. It has already been predicted that New Jersey will be at full "buildout" by 2050. While very large PV projects may be more "cost effective", that fact needs to be weighed against New Jersey's desire to retain our open space and farmland.

- Categories for deployment should include brownfields, government building rooftops and parking facilities, multi-apartment (especially LMI) building rooftop and parking facilities,

warehouse rooftops and parking facilities, other commercial building rooftops and parking facilities. We should avoid as much open, undeveloped land as possible.

- No Community Solar should be sited on existing forested land nor on Open Space or Farmland preserved via a State ballot question. Nor should it be sited on agricultural land unless it is deminimis and serving a LMI community within 5 miles of the site.

I suggest that incentives/adders be given to brownfields that serve LMI communities. However, I urge that landfills be treated quite differently than brownfields because they are extremely expensive for solar deployment. Landfills “settle” over many years so that strong (& expensive) infrastructures would need to be built to actually support the weight of the PV. Any landfill solar (community or otherwise) should be privately funded. Possibly tax incentives could be given for privately owned landfills. Public landfills may be given some incentives but not from ratepayers. I urge you that ratepayers not be required to cover any landfill solar costs (at least not above what they would for brownfields). Nether the State nor ratepayers should assume any liability that may arise in the future as a result of any deployment of Community Solar on any brownfield or landfill site.

— I suggest that the pilot include at least one project deployed on an integrated basis with a municipal micro-grid system. The Board should consider incentives/adders for such municipal (and possibly county) projects. I truly believe that such arrangements are part of New Jersey’s energy future. In fact, school and government building roofs & parking lots should be prime locations for community solar.

— I recommend that at least one pilot be with a homeowners’ association. I expect that homeowners' associations will be a prime source for community solar in the future. For instance, the senior citizen complexes near Exit 8A would be a good partner for projects deployed on nearby commercial warehouse roofs.

-- Special considerations and incentives must be given to LMI Community Solar projects:

- I suggest that at least 15 to 20% of the community solar capacity be allocated to LMI solar - both single/double family housing as well as for affordable (public) LMI housing - both privately and publicly owned.

- Of course, these projects would also require something like a 40% allowance for anchor subscribers. In addition to “normal” anchor subscribers, they should also include housing entities and community service organizations.

- I recommend that during the pilot, LMI Community Solar projects go to the front of the application queue, and that LMI customers be guaranteed to receive at least 25% in electric bill savings.

- Consideration should be given to providing an Adder, calculated on a sliding scale based on percentage of LMI participation in the project capacity.

--As much as possible, the BPU should coordinate the Community Solar Program, with the BPU’s Energy Efficiency Programs, especially if roof replacement would be necessary on the site.

--The EDA should be involved in this Community Solar effort. Hopefully, a NJ Green Bank will be established - partnering government funds with private funds. Then the EDA should use this opportunity to help fund LMI Community Solar and have a Community Solar carve-out.

— I strongly recommend that the RGGI monies be exclusively dedicated to LMI Community Solar - at least the BPU and EDA portions. If at all possible, the DEP RGGI portion should supplement these projects, e.g. by planting trees in these LMI subscriber communities.

--The Board should also review whether a portion of CEP Renewable Energy funds should go toward Community Solar.

-- I urge that EDCs not be authorized to install Community Solar unless there is market failure in a specific area, i.e. no other option for an urban LMI community solar installer. Competition should be the goal. Even in market failure locations, these project costs should not be rate-based but be given the same incentive/adder that would go to a private installer.

-- Bottom line, New Jerseyans are already facing significant rate increases, e.g. the nuclear subsidy, OSW, RGGI, large rate case & infrastructure filings. The BPU must avoid as much as possible adding unnecessary costs to the ratepayers, through utility rate-basing or by other means. Instead, incentives, e.g. tax credits and public/private partnerships, should be utilized.

—Because New Jersey is a high cost-of-living state, I recommend that the Board should consider defining LMI as 200% of federal poverty level. It may be possible to use a definition already in use for another purpose, e.g. LIHEAP. The Board may want to make it higher, especially if in an Environmental Justice community. You might also repurpose some LIHEAP funds when LIHEAP customers become Community Solar subscribers.

— The Community Solar bill credit process and practices should be handled as closely as possible to how solar net-metering credits are currently done by the EDCs, e.g. on the customer's EDC bill. For the pilot, I recommend using the solar current net-metering process and later grandfather in those pilot projects. This will greatly encourage Community Solar pilot projects. Community Solar should be included in the SREC review process, which will likely eliminate all net-metering going forward.

—Community Solar marketing must be controlled so that potential subscribers are not unfairly harassed. I suggest that the BPU establish a simple review process for all marketing materials or set forth specific guidelines, e.g. compare EDC's costs to Community solar costs, etc. Consideration should also be given to prohibiting robocalls.

LMI communities solar workforce development training programs should be established by other New Jersey agencies, likely via the Department of Labor and/or the Department of Community Affairs, in which grants could be provided to community organizations, e.g. Isles and Casa de

Don Pedro. Monies other than ratepayers should be utilized. These programs should then match urban trainees with the IBEW as interns (as is being done in Baltimore).

During the SREC review and Energy Master Plan Processes, I recommend that the BPU/State:

- Include DCA building codes to prepare for future Community Solar, other renewables, energy storage, electric vehicles, etc. The State should consider something like the New York City “Stretch Building Code” or “beneficial strategic electrification”.
 - Develop a energy efficiency requirement for future RE programs.
 - The State should quickly move away from costly (to the ratepayers) net-metering and to a simpler Value of DER similar to California’s.
 - The SREC successor should include differentiated incentives to support low-income residential customer solar adoption, and affordable housing operator solar adoption. The SREC successor should also be structured to drive access, ownership, and job opportunities for environmental justice communities and communities of color.
 - Consider requiring municipalities to have Community Solar based upon their percentage of LMI residents (aka Mount Laurel housing).
 - Prioritize and possibly incentivize Community Solar as well as RE, EE and other DER programs in the most congested areas of the State to cut the expensive peak load that impacts all customers. EDCs must identify these most congested locations.
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I have also attached a Princeton Woodrow Wilson School graduate report that BPU staff and some commissioners already have so that it can be a part of the official record. Thank you.

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