

**Michele N. Siekerka, Esq.** July 31, 2018  
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Aida Camacho-Welch  
Secretary of the Board of Public Utilities  
State of New Jersey  
44 South Clinton Avenue  
3rd Floor, Suite 314  
Trenton, New Jersey 08625-0350

**RE: Docket No. QO18060647 – New Jersey Community Solar Pilot Program**

Dear Ms. Camacho-Welch:

On behalf of our member companies that provide more than 1 million jobs in the state and make the New Jersey Business & Industry Association the largest statewide business association in the country, we are submitting the following comments on Docket No. QO18060647 – In the matter of New Jersey Community Solar Pilot Program.

NJBIA supports the vision of Governor Murphy and legislative leaders to develop clean, renewable energy in the state of New Jersey and to diversify our energy portfolio. However, as NJBIA has noted in the past, New Jersey currently has the highest electric rates in our grid and the 12th highest in the country. The commercial and industrial ratepayer consumes 64 percent of the electricity in New Jersey and has a vested interest in the development of energy policy, the implications on competitiveness and ratepayer impact. Currently 24 percent of the electric bill is from government imposed taxes and fees. This does not include possible increases that ratepayers will face as a result of other renewable energy programs proposed this year, such as the solicitation of 1,100 MW of offshore wind energy, which will likely be subsidized by even higher prices. NJBIA has been involved in this discussion for many years and seeks to balance the environment with the economic impacts to ratepayers.

Community solar installations allow individuals and groups that have previously been unable to install solar panels on their own properties to utilize energy generated by community solar arrays. This includes homeowners who have shaded roofs, those living in homes that do not permit the installation of solar panels, and low-income individuals who cannot obtain solar equipment for a variety of reasons. However, NJBIA remains concerned that such an effort will result in price increases for non-subscriber ratepayers in order for utilities to provide a mandated credit to subscribers for their participation. This concern has been voiced in other states implementing community solar as well.

NJBIA believes that there is also an opportunity for business to participate in these projects and to assist with achieving the overall objectives of the program. This participation should be available to businesses as both subscribers and as hosts, as business locations may be able to site some of these projects if they are open to the concept. Many business facilities have unused roofs and outdoor spaces which would be ideal locations for a new solar panel array.

In order to protect ratepayers, NJBIA encourages BPU to adopt several lessons learned from elsewhere in the country. When setting limitations on project size, BPU should attempt to understand the demand for solar energy from those that this program is intended to benefit – residential and low-income subscribers who cannot attach solar arrays to their homes for financial or other reasons– and scale restrictions accordingly. BPU should also examine the potential effects

of a community solar program on the rest of the non-community solar energy market before implementing these changes.

In addition to these considerations, NJBIA continues to ask that BPU consider the cumulative impact to ratepayers of the current administration's clean and renewable energy goals. The community solar program is just one of several proposals which may result in new costs and fees being shifted to ratepayers in order to fund mandates and credits. Taken individually, these costs may not always appear significant, but when taken together these new costs to ratepayers could amount to substantial increases on top of already high prices.

NJBIA recognizes the benefits of an electric grid which receives power from a diverse mix of sources, but we must always be sure to consider how our attempts to diversify those sources will impact ratepayers.

We continue to request that you consider the following matters related to this long-term policy:

- What is the cost benefit analysis for ratepayers to subsidize this type of power?
- How much will this new energy source cost businesses in increased rates?
- How many potential jobs will be gained/sustained by the project?
- Are there other alternatives that could meet our policy goals while protecting ratepayers?
- Will there be an adverse impact to jobs outside of solar due to increased electric prices by businesses?

Thank you for your consideration of our comments.

A handwritten signature in dark ink, appearing to read "Christine Buteas". The signature is fluid and cursive, with the first name being more prominent than the last.

Christine Buteas  
Chief Government Affairs Officer