



Secretary Aida Camacho
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350,
Trenton, New Jersey 08625

July 31, 2018

RE: Development of a Community Solar Pilot Program, BPU Docket No. Q018060646

Dear Secretary Camacho:

The Solar Energy Industries Association (SEIA) appreciates the opportunity provide brief comments in response to the Board of Public Utilities' (BPU) July 6, 2018 Notice in Docket No. QO18060646.

SEIA is the national trade association of the United States solar energy industry. SEIA represents approximately 1,000 firms across the county, with many of these firms doing business in New Jersey, and nearly 40 member firms that list a specific New Jersey operating address. SEIA member companies in operation in New Jersey are working in all market segments, including community solar.

SEIA strongly supports the provisions of P.L. 2018 c.17 that created the community solar pilot program. Community solar projects moving forward in New Jersey will allow more of the state's residents to access the benefits that solar provides. We encourage the BPU to move as quickly as possible to finalize a robust pilot program.

We join the Coalition for Community Solar Access in advocating that community solar projects should receive a full retail rate credit as well as access to Class I RECs. It is unlikely that SREC capacity will be available for the pilot program given the pipeline of SREC-eligible projects currently in place. Therefore, authorizing access to Class I RECs is an appropriate alternative until a new solar incentive program can be put in place.

Furthermore, the community solar pilot program should allow for projects to be sited on locations outside of already developed properties, particularly given the best practices in land stewardship that have been developed elsewhere and could be used in New Jersey.

Please do not hesitate to contact me with questions about this letter.

Sincerely yours,

A handwritten signature in black ink that reads "David Gahl". The signature is written in a cursive, slightly slanted style.

Solar Energy Industries Association
Director of State Affairs, Northeast
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cc: Ariane Benrey