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NEW JERSEY CHAPTER

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www.SierraClub.org/NJ

July 31, 2018

Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue
3rd Flood, Suite 314 CN 350
Trenton, NJ 08625
Rule.Comments@bpu.nj.gov

Re: New Jersey Community Solar Energy Pilot Program

Dear Ms. Camacho:

The Sierra Club supports New Jersey's Community Solar Energy Pilot Program and offers our comments and suggestions. Community solar is important for our environment and economy because it allows any ratepayer to subscribe to an off-site solar installation. This allows people who are unable to install solar panels on their own property benefit from solar energy. Towns or non-profits could qualify as well, helping whole areas go off the grid, saving money and reducing air pollution. For years, New Jersey has been blocking community solar from happening and now that it finally is, we need to do it right.

We support these projects that will help the many people who can't put solar panels on their own property for different reasons. Some properties can't utilize solar because of their location, physical limitations, or unstable roofs. Many people can't take advantage of solar because they rent their homes as well. Having more solar power saves ratepayers money and helps deal with climate change while growing our economy. Since the solar program went into effect about 10 years ago, solar has become 29 percent more efficient and gone down in price by 25 percent. There are five times as many jobs in the solar sector than there is in the coal industry. Improving solar energy in the state would make our environment cleaner, fight climate change, and increase green jobs. New Jersey can be a leader nationally in clean energy and clean energy jobs.

We also believe that the 50 MW of community solar should be targeted to environmental justice and low-income communities. This is because they need it the most. People in the suburbs are putting their own solar panels on their homes. These are people who have been disproportionately affected by climate change and therefore should be targeted for this clean energy. We should try to focus on brownfields, rooftops, and parking lots and other underutilized lands. Prioritizing the location for community solar will allow more people to tap into solar power. Community solar is an important way to advance clean energy while helping environmental justice communities.

This pilot project is a step forward but it's tiny in comparison to what we need. We should be creating a full community solar program such as other states have, so that we can advance solar power for everyone in New Jersey. Maryland has a 30% carve-out for community solar for



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projects where 20% of the output serves low and moderate income communities and Massachusetts has roughly 23%. We ideally want at least 20% set aside for community solar in New Jersey and for the state to remove the size cap it has for these community projects to allow for larger projects that can extend to whole neighborhoods and even towns. We also need to remove the cap on the size of the systems themselves. We hope to expand beyond 50 MW a year to at least 100 MW a year as well.

We are concerned that we'll never reach the goal of 100% renewable energy by 2050 without a strong solar program, including community solar. Next year the solar market could collapse, so we urge the BPU to move forward quickly on this before all the SRECs go out to other projects. We look forward to working with the agency to move forward community solar and use it to benefit the people and environment of New Jersey by providing clean energy and green jobs.

If you have any questions or would like to discuss this matter further, please feel free to call me at (609) 558-9100.

Sincerely,

Jeff Tittel
Director, New Jersey Sierra Club