



# ACUA

## Atlantic County Utilities Authority

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**July 30, 2018**

Aida Camacho  
Secretary, New Jersey Board of Public Utilities  
44 South Clinton Ave  
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Subject: Community Solar Energy Pilot Program

The Atlantic County Utilities Authority wishes to add the following comments to the record for stakeholder input on the Community Solar Energy Pilot Program. With regards to project siting the ACUA strongly advocates for the use of landfills and brownfields to host community solar projects. Landfills and brownfield sites should be high priority locations for potential projects for multiple reasons.

As contaminated sites these locations have few other redevelopment possibilities, siting solar on these properties would allow for beneficial use of the sites while also limiting public access to lands which may contain toxins or other public health concerns. Secondly these sites often have little or no “on-site” energy demand that would make them suitable for a traditional net-meter solar project that could take advantage of all the available land. If New Jersey is to meet its renewable generation goals the available land at brownfields and landfills should be capturing the maximum generation capacity and not limited to the size of on-site demand. Lastly, many brownfields and landfills are located in close proximity to low and moderate income neighborhoods, as well as areas with other environmental justice concerns. Providing access to community solar to these neighborhoods, from projects at nearby hazardous sites, would meet additional objectives of this program.

The ACUA strongly encourages the Board to craft this program to take full advantage of landfills and brownfields as host sites for community solar projects. Additionally, the ACUA would suggest the Board work closely with the NJ Department of Environmental Protection as well as the municipalities, counties, and authorities that own many of these sites to further develop best practices for siting community solar.

Sincerely,

Richard S. Dovey  
President