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

07/30/2018

Re: New Jersey Community Solar Energy Pilot Program

Commissioners –

As you are aware, Power52's suite of services (Power52 Energy Solutions and Power52 Foundation) is one of the state's premier solar developers and workforce development and training programs. Specifically, Power52 Foundation focuses on training our at-risk population in Renewable and Clean Energy Technologies.

Power52 Foundation is a 501(c)3 non-profit dedicated to workforce development, career training, and job placement assistance in the Clean Energy Sector. In addition, Power52 Foundation focuses on providing clean energy access to low-income communities by way of resiliency hubs.

Power52's approach is innovative in addressing the renewable energy industry's workforce challenges by tapping into a population that is in need of work but have employment barriers which makes it difficult to find a job that provides a living wage and opportunities for upward mobility. We engage low-income individuals who may have low levels of education, a history of incarceration or substance abuse, and other barriers to employment. Our training program includes extensive case management throughout the program and for twelve (12) months beyond, to ensure that individuals employed through the program receive the support they need to be successful. Our training curriculum includes "soft skills" training that teaches the importance of punctuality, work ethics, professional appearance, time management, financial literacy, etc. Ultimately, the training yields a marketable skill in an industry that has significant need for skilled workers and pays a living wage.

Power52 Foundation's mission is to make an immediate impact by providing workforce development and training programs with wraparound services. As a recipient of the State of Maryland's EARN Grant, and the Green Jobs Act created by Governor Hogan, come August 10 2018, Power52 Foundation will have graduated ninety-two (92) Energy Professionals from our two training facilities with the expectation of training and graduating an additional 92 Energy Professionals in 2018.

On August 10, 2018 thirty (30) trainees will graduate (Cohort 5 at Power52 Energy Institute Baltimore City, and Cohort 2 at Power52 Energy Institute) and be placed into Power52 Solar Boot Camp (P52SBC). P52SBC is lead by Power52 Energy Solutions and helps give the graduates "Real Life" solar experience. During P52SBC, the graduates work closely with our Energy Industry Partnership to gather real life experience for the engineering, construction, and maintenance of utility scale ground mount, canopy, and rooftop solar installations. Upon completion of 40 hours of P52SBC, the Energy Partners participate in Career Days and speed interviews. The graduates then have a chance to interview with the Partners for

full time employment. Wrap around services and case management is continued throughout P52SBC by Power52 Foundation. To date, we have placed fifty-four (54) trainees with new jobs with the help of our Energy Industry Partnership. The Energy Industry Partnership consists of companies like Power52 Energy Solutions, NESS, Suncatch, MbHaynes, RECON, Sol Systems, SGC, NexAmp, and Core Development, and Nautilus, to name a few.

Specifically, Power52 Energy Institute graduates have completed the construction of a 5 Phases 2MW Phases, or 10MW system, co-located at a site called Nixon Farms. The site, though located in the surrounding county, serves load located in urban centers based within the local AHJ (Authority Having Jurisdiction). Its clean energy projects like this that provide ***Clean Energy Jobs***, ***Community Economic Impact***, ***Hands on Experience***, and ***Substantial Energy Savings*** to the communities that we serve. Communities/organizations that can then take these savings that come from a project like this, and re-allocate those funds to new and better programs that directly benefit our society.

We have had the opportunity to attend the stakeholder meeting and review the New Jersey Community Solar Energy Pilot Program on July 24, 2018 in Docket No. Q018060646. While we did not have an issue at hand in the original Clean Energy Bill passed by Governor Murphy, we write you now to give you our comments around two specific concerns regarding the **Siting and Project Size** and the **Low to Moderate-Income Access**.

Concern 1: Siting and Project Size: Power52 has a concern around the notion that projects should be located inside the urban centers due to the transportation barriers that affect the communities we serve. In addition, P52 has a concern around the thought that locating the community solar project outside of the communities being served would somehow limit the investment in the local urban centers by the subscriber organization or solar developer.

P52 Comment: You can't ensure that there will be transportation to and from the job site, however with public transportation considerations, UBER credits and other forms of community transportation, we as a community must figure out a solution that will ensure that individuals have access to life sustaining wages that support the family.

1.) Everyone needs transportation in order to sustain meaningful employment and historically these types of jobs are not found within the 4 block radius of their homes. Do the medium high to high income workers mostly work within a 4 block radius of your home? If not, then why should the LMI community be limited to do so?

At Power52, we train in the urban centers then transport the graduates out to the solar sites for the Power52 Solar Boot Camp and/or assists with transportation to and from job sites, when the graduate is starting at a new job site. This accomplishes 2 goals. One, they learn the importance of punctuality and two, how to work as a team. What has happened through implementing the Power52 rideshare program is as they work and save, they are able to purchase reliable transportation to get them to and from work, and then they are able to build wealth. Society has limited their opportunity and growth enough from failed social programs. We cannot do the same with community solar.

2.) Subscriber Organizations and Developers are not investing in Urban Centers by locating projects in urban centers. The monies provided for the development and construction of these solar generating facilities leaves the community as soon as the project is complete. Developers source materials from outside the community, bring labor from outside the community and the profits go to developers from outside the community so it is not clear to me what benefits come to the community? The way you invest in the community is by creating jobs in the community. Power52's mantra is ***"For the Community, By the Community!!"***. Social change starts with financial impact. Create the jobs and access to opportunities and the communities change.

Power52 suggests you ensure that community benefits from the community solar program are realized in the community being served by doing the following.

1.) Local Workforce Development and Training: Community Solar Projects must source labor from the communities being served. This means investing in job creation programs in advance of the pilot so that skilled/trained labor is ready and available when the PILOT is implemented.
2.) LMI Community Solar Incentives: Power52 encourages the State of New Jersey to allocate incentives (SRECS/Feed in Tariffs) for projects that serve at least 51% LMI. This ensures that the highest financial impact goes to the folks who need it most (LMI).
3.) Opportunity Zone Sited Incentives: Power52 suggests that Interconnection Priority/incentives (SRECS/Feed in Tariffs) for projects that are located in an opportunity zone. This allows for urban investment without limiting it to an urban footprint.
4.) Non-Union Labor: Power52 encourages the State of New Jersey to allow for non-union labor to work on projects under 2MWAC (or 2.46MWDC). Our understanding is that current union policy does not allow individuals, with the backgrounds that we serve, to qualify to work as part of a union shop. Either these regulations need to be amended to allow for equal access of all people or, we need to start our own union that removes these barriers that society has put in place to isolate the growth of the populations we serve.
5.) Co-locating Solar Sites: Community solar sites that serve LMI communities should be able to be co-located on one parcel of land or on adjacent parcels of land, to the extent the necessary line capacity is available. By co-locating multiple sites, you create an economy of scale, that provides substantial savings that can be passed on to the end user. By simply co-locating multiple solar generation sites, on average there is an additional 8% savings passed on to the LMI Household. Below is the how locating allows for additional savings.

- **Interconnection Cost:** The price for any upgrades can be spread across multiple projects.
- **Development/Legal:** Preliminary engineering, zoning, and stormwater management plans can be done with the entire site in mind.
- **Landscaping:** Instead of covering all for sides of a farm, design a buffer for the outward facing sides to save on the landscaping between adjacent sides.

- **Labor and Construction:** Crews can roll from one site to the next as they complete their respective tasks. i.e. the module racking crew starts on phase 1 and moves to phase 2 when complete, then the module placement crew starts on Phase 1 while the racking is being done on Phase 2. Then the medium voltage crew comes in and starts wire maintenance on Phase I, the module placement crew goes to Phase 2, and pile and racking team then would start on Phase 3. You follow this same methodology all the way through Phase 5.
- **Commissioning:** SEE LABOR AND CONSTRUCTION EXAMPLE
- **Final Interconnection (Utility):** SEE LABOR AND CONSTRUCTION EXAMPLE

Concern 2: 15% Allocation of Community Solar Capacity for LMI: It has been suggested that only a 15% carve out for LMI should be implemented due to limited incentives that can only support 15% of capacity going to LMI customers.

P52 Comment: One does not affect the other. The BPU can still advocate for 15% to support incentives, however if only 15% of the market will be considered for these specific incentives, give the incentives to the **"L"** in the **L**MI stack. Low income families make up 20% of the 134M household in the United States. Allow those incentives/savings to go to that demographic.

Power52's suggestions are as follows:

1. ***LMI Care out of 30%:*** Power52 suggests a 30% allocation for LMI Households for year 1 of the PILOT. If the number of subscriptions contracted exceeds the PILOT year 1 allocation, then it jumps to 51% for the balance of the PILOT and becomes part of the Clean Energy Policy.
2. **Monetary Incentives for Low Income Households:** Power52 suggests a monetary incentive mechanism go to Low Income Households (15% capacity carve-out). Low income is defined as household whose annual income is below or at 50% of the median family income.
3. **SREC Allocation for LMI Projects:** SREC Incentives or Feed in Tariffs go to projects that serve 51% LMI, at a minimum.

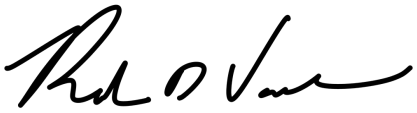
Regarding Siting and Project Size, our general comments are below:

1. Pilot size should be unlimited for the LMI category enabling developers to serve the community without limitations in the pilot to encourage creativity and innovation.
2. Capacity should be allocated based on rate base size and excess should be allocated to the EDC that has the most requests and prioritize projects serving LMI
3. Categories should include Commercial (25% of total capacity), LMI 30% (25% of total capacity), LMI 51% (Higher priority) and 51% LMI (50% of total capacity)
4. Co-Location should be allowed for the 51% LMI category
5. This should be divided by each utility EDC territory

6. There should be no limitations in land use during the pilot, this will enable the most creativity and innovation during the pilot period. The Commission should issue guidance for all county/local zoning jurisdictions to reduce confusion related to zoning approvals, even more so the commission should recommend that the counties/local zoning jurisdictions create an expedited process for solar approvals
7. Publicly owned facilities/parking facilities, utility easements (under transmission lines) open space should all be allowed to be used as community solar sites. Priority should be given to 51% LMI categories for these lands and if there are no requests other categories should then have opportunity to utilize sites. Brownfields should also be included in allowable sites.
8. No limit to project size on landfill if supporting an LMI category project

Thank you for your consideration and Power52 looks forward to working with the State of New Jersey's Board of Public Utilities to roll out a successful community solar program that benefits all members of society!

Rob Wallace



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