

July 31, 2018

Aida Camacho
Secretary
New Jersey Board of Public Utilities
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Trenton, New Jersey 08625

Ironbound Community Corporation (ICC) would like to submit these comments to the New Jersey Board of Public Utilities (BPU) regarding the rule making for its proposed Community Solar Energy Pilot Program. ICC also supports the comments submitted by Vote Solar and by the New Jersey Environmental Justice Alliance.

Ironbound Community Corporation is a 49-year-old community based organization in the East Ward of Newark (also known as the Ironbound), and is well-known for its work in the area of Environmental and Climate Justice. Through grassroots organizing and helping to create and guide policies on the state and municipal levels, ICC has been instrumental in safeguarding Newark and its people from the harmful impacts of polluting industries.

The Ironbound community and Newark in general is one of the communities described in New Jersey Governor Phil Murphy's recent Executive Order No. 23 on Environmental Justice: it is a "historically . . . low-income communit[y] . . . of color [that] ha[s] been exposed to disproportionately high and unacceptably dangerous levels of air, water, and soil pollution, with the accompanying potential for increased public health impacts . . . often fac[ing] other serious problems beyond environmental issues, including health risks and housing challenges." N.J. Exec. Order No. 23 (Apr. 20, 2018), <http://www.nj.gov/infobank/eo/056murphy/pdf/EO-23.pdf>.

The negative impacts on the health and well-being of Newarkers resulting from the cumulative impacts of egregious pollution, is the reason for our advocacy of renewable energy and energy efficiency. Communities like Newark that suffer from the negative environmental impacts of energy infrastructure, should directly benefit from any efforts on the part of BPU to implement energy efficiency and renewable energy projects. BPU should facilitate the active participation of Environmental Justice communities in this process through the immediate formation of stakeholder groups comprised of community based organizations, community members and other community stakeholders.

Environmental Justice Communities like Newark should be given maximum consideration in the process of siting and ownership of community solar projects. The 15% carve-out for LMI communities is a good start but should by no means be a cap on the participation of LMI

communities, especially Environmental Justice communities. BPU should be prepared to facilitate technical trainings on the projects for community members in addition to job trainings and placements that bring Environmental Justice community members into the labor force for the construction of these projects. Communities should be fully informed about and participatory in project ownership, siting of projects and be generally included in the decision making processes. We also agree fully with the position of the New Jersey Environmental Justice Alliance that in LMI communities, community based organizations should be considered for co-ownership of projects. We imagine Community Solar to involve the partnership of municipal entities, community based organizations, private businesses and community members. We also imagine that projects would potentially be sited over parking lots, on brownfields and on new and existing warehouses as part of Community Benefits Agreements with private and public entities. LMI ratepayers must also be informed and protected as consumers. Lastly, BPU must apply incentives appropriately to ensure that projects are inclusive of the above and are able to provide relief to ratepayers. This for us, would be the measure of a successful project.

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via electronic submission to rule.comments@bpu.nj.gov