

**Greenhouse Gas Reduction Fund: Solar for All
New Jersey Solar For All Program
Work Plan
Project Period: 9/1/24 – 8/31/29**

[Submitted to USEPA: 11/15/24]

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Project Title: New Jersey Solar For All Program

Grant Number: 84091101

Organization Name: New Jersey Board of Public Utilities (“NJBPU”)

Geography: State of New Jersey

Definition of LIDAC: New Jersey's Solar for All Program utilizes various LIDAC definitions depending upon the nature of the household and the specific solar program. For community solar, residential solar, enabling upgrades, and technical assistance programs, LIDAC is defined as: disadvantaged communities identified by the CEJST mapping tool or geographically dispersed low-income households. For multifamily affordable housing solar, LIDAC is defined as either: properties providing affordable housing, CEJST-identified disadvantaged communities, or geographically dispersed low-income households; the exact definition utilized for multifamily solar depends on any overlap with the definition of “overburdened communities (“OBC”) utilized by the New Jersey Storage Incentive Program (“NJSIP”). New Jersey defines OBCs¹ as block groups determined by the Census with:

- At least 35 percent low-income households; or
- At least 40 percent of the residents identify as minority or as members of a State recognized tribal community; or
- At least 40 percent of the households have limited English proficiency

During the planning period, NJBPU will overlay the OBC definition utilized by NJSIP with the LIDAC definitions used by multifamily solar to identify areas of overlap. Additionally, NJBPU will consider during the planning period how to approach eligibility across all NJSFA programs of LIDACs identified by the EJScreen tool but not CEJST (based on an initial analysis, there are ~600 EJScreen Census block groups that are not covered by CEJST-identified Census tracts).

Introduction

Section 1: Project Description

1.1 Overview

New Jersey (“State”), through the Board of Public Utilities (“NJBPU”), has designed a Solar for All program (“NJSFA”) that tackles major barriers preventing the adoption of solar energy by its low-income and disadvantaged households. As a result of cross-agency collaboration, the State has determined four key pillars to stand up new contractual programs to best meet the goals of the Greenhouse Gas Reduction Fund: (1) community solar and associated enabling upgrades, (2) multifamily housing solar with a pathway for connected storage incentives, (3) residential solar, and (4) technical assistance and workforce development. The State's proposed use of funds across the four NJSFA pillars is anticipated to serve up to 25,000 households in Low Income and Disadvantaged Communities (“LIDAC”) and finance the deployment of 200+ megawatts (“MW”) of new solar energy. Combined with NJBPU's extensive experience in managing successful solar

¹ [New Jersey Department of Environmental Protection, "What are Overburdened Communities \(OBC\)?"](#)

deployment programs, along with the State's significant demand for more solar energy, NJSFA will accelerate the clean energy transition in underserved communities.

- 1 Community Solar Expansion (CSE):** New Jersey plans to expand its community solar capacity through the CSE contractual program that would fund up to an additional 84MW in new generation through EY30. This contractual program, totalling \$85.7 million, will be structured through direct incentives to developers, provided certain conditions are met, including that 100% of subscribers belong to CEJST-identified disadvantaged communities or geographically dispersed low-income households and each household can save at least 20% on their annual electricity utility bills. Alongside the CSE contractual program, NJSFA will open a stackable incentive opportunity of \$28.3 million for community solar developers to construct projects in areas of constrained grid capacity. Incentives for community solar enabling grid upgrades will aim to reach LIDAC areas deemed infeasible due to costly distribution system upgrade costs. This complementary contractual program allows up to 71MW of additional community solar generation onto New Jersey's grid. Together, the CSE program and community solar enabling grid upgrade incentives can deploy up to 155MW in new generation capacity. During the planning period, NJBPU will further refine the program design and incentive calculation in consultation with developers and other key stakeholders, including utilities.
- 2 Multifamily solar including associated storage:** New Jersey's multifamily solar program, totalling \$18.1 million, will aim to extend access to solar energy for low-income residents, particularly in affordable housing units. New Jersey has seen low uptake by multi-family housing in its current solar programs and no uptake for affordable housing due to a gap in net metering credits between the commercial rate used for master-metered² multifamily buildings and the residential rate for single-family homes. Low commercial rates create a financial disincentive for developers to site projects on multi-family buildings or to serve residents of multi-family buildings. The multifamily contractual program will bring solar energy access to an estimated 5,000 multifamily households via an incentive of approximately \$430 per kilowatt ("kW") based on an NJBPU analysis of the existing gap in net metering credits. New Jersey will also incorporate specific scoring criteria to encourage 2 megawatt-hours ("MWh") of storage capacity per MW of multifamily solar deployed by potentially creating a direct pathway for NJSFA recipients to also be considered in New Jersey's soon-to-be launched NJSIP. NJBPU plans to prioritize overburdened communities in the NJSIP potentially through an adder or separate capacity block. NJSIP will utilize OBC designation per the New Jersey Department of Environmental Protection ("NJDEP") as opposed to the federal LIDAC definition. Based on an initial analysis, NJBPU estimates that 1,465 block groups are both OBCs and CEJST-identified LIDACs and therefore could be targets for both the NJSFA multifamily contractual program and NJSIP funding.
- 3 Residential solar:** Residential solar can bring clean energy to low-income households and offer a pathway to building equity in solar technology ownership. New Jersey is cognizant of the existing barriers to reaching LIDACs with residential solar due to the financial burden imposed by developing and owning a rooftop solar system. In New Jersey, there are 25% more residential installations in zip codes without disadvantaged communities than in those with

² Single meter that measures the utility usage of an entire building

such communities.³ Through Solar for All investment, New Jersey aims to fund a \$9.3 million program to incentivize residential solar for geographically dispersed low-income households or CEJST-identified disadvantaged communities, potentially through a “lease-to-own” construct that would provide a direct incentive to solar financing service providers to compensate the transfer of ownership cost after a specified period of time.

- 4 Technical assistance & workforce development:** Finally, New Jersey will allocate NJSFA funds up to \$6.8 million to bolster existing workforce training programs and funds up to \$1 million to enhance customer outreach or interconnection, permitting, and/or siting support in coordination with the State’s electric distribution companies (“EDCs”). Workforce training includes pre-apprenticeship, apprenticeship, onsite job training and a new competitive fund for innovative workforce solutions.

These pillars represent a mix of new and existing programs that the NJBPU oversees. Existing programs were prioritized for inclusion in this application where New Jersey is confident that the programs can be effectively and efficiently scaled to accelerate the clean energy transition. For new program launches, New Jersey plans to pilot in a high-impact area to reach specific low-income and disadvantaged communities where the State currently lacks a funding pathway.

1.2 Project Outputs, Outcomes, and Linkage to the U.S. EPA’s Strategic Goals

Environmental Results - Outputs and Outcomes:

Metric	1. Expansion of existing community solar + enabling upgrades	2. Multi family solar + storage	3. Ownership program for residential solar	4. Technical assistance & workforce development	Total
Funding, \$	\$85,700,240	\$18,103,760	\$9,343,200	\$14,286,000	\$127,433,200
\$/W	\$1.02	\$0.43	\$1.21		\$2.66
Enabling upgrade funds, \$	\$28,286,800				\$28,286,800
\$/W	\$0.40				\$0.40
HH served, # of HH	19,313	5,296	966		25,575
\$/HH	\$5,902	\$3,418	\$9,674		\$18,994
Workforce, new jobs				333	333
# individuals trained				416	416
Solar, MW	155	42	8		205
\$/MW	\$737,745	\$427,300	\$1,209,230		\$2,374,275
Battery storage, MWh		85			
\$/MWh		\$213,650			
Emissions, short tons CO2	210,130	57,620	10,508		278,258
\$/short ton	\$542	\$314	\$889		\$1,746
Annual savings, \$	\$219,422,545	\$60,168,293	\$10,972,829		\$290,563,667

Impact assessment estimates:

- **Power approximately 25,500 LIDAC households** at a rate of about \$5,500 in NJSFA subsidies per household

³ Source: NJ Department of Environmental Protection Bureau of GIS, USEPA Climate and Environmental Justice Screening Tool

- **Deploy approximately 205 MW of new solar energy plus up to 85 MWh of associated storage** across the State, benefitting LIDAC households within the first five years of funding
- **Achieve CO2 emissions reductions of approximately 278,000 short tons**
- **Achieve approximately \$290 million in total energy bill savings over 30 years**, the expected useful life of solar panels, for residents in newly connected households at a rate of approximately \$11,000 in savings per household, or double the savings compared to financial assistance funding

Linkage to U.S. EPA’s Strategic Goals

This award supports the following goals and objectives of the FY 2022-2026 USEPA Strategic Plan and defined in the Solar for All Notice of Funding Opportunity:

- **Goal 1: Tackle the Climate Crisis**
 - Objective 1.1: Reduce Emissions that Cause Climate Change
 - NJSFA will generate 200+ MW of solar energy and achieve CO2 emission reductions of 278,000 short tons per year, greatly reducing emissions and supporting the deployment of clean energy.

Outputs and outcomes were calculated based on *new* solar generation enabled by financial assistance through community solar expansion, enabling upgrades, multifamily solar plus storage, and residential solar. These impacts will be updated and finalized during the planning period, as NJBPU finalizes each contractual program.

Section 2: Project Design Plan

2.1 Activities to be Conducted

2.1.1 Meaningful Benefit Plan

Plan to ensure 20% energy bill savings

As a part of the NJSFA, NJBPU will ensure minimum 20% bill savings to community and residential solar subscribers, inclusive of any costs incurred to participate in the program. NJBPU estimates that this 20% bill savings requirement would yield approximately \$275 in annual savings for New Jersey residents, based on the average monthly electricity bill. NJ has several mechanisms for ensuring that 20% bill savings are provided to all recipients of the funding. NJBPU will build on existing structures in place to calculate bill savings and ensure 20% is reached across all programs:

- **Community solar:** NJBPU will set the bill credit based on the current calculation for existing community solar program.⁴ This credit will be represented as a separate line item on

⁴ At the pre-Sales-and-Use-Tax (“pre-SUT”) retail rate (under the New Jersey Sales & Use Tax Act, a tax of 6.625% is applied to the sale of electricity in the state), including supply and delivery charges, but excluding demand charges, monthly fixed customer charges, and non-bypassable charges. EDCs will then calculate the credit for each rate class based on applicable pre-SUT Basic Generation Service (“BGS”) charges, using rates from the month of energy generation. They will apply the credit to the subscriber’s monthly kWh subscription share, as reported by the subscriber organization.

subscribers' utility bills. Developers will be required to ensure 20% bill savings for all community solar projects funded by NJSFA money – this includes all CSE and/or enabling upgrades awarded projects. NJBPU will spend a portion of the planning period to determine the specific method for calculating and verifying the 20% savings requirement for all project subscribers. This may include developing reporting requirements for community solar operators and implementing periodic audits to confirm consistent achievement of the savings target.

- **Multifamily + storage:** For master-metered, multifamily buildings that install on-site solar, the financial benefits must flow to residents. These benefits will include direct payments or a rate abatement as well as indirect benefits (e.g., facility upgrades, resident services). NJSFA will require master-metered building owners to provide proof of pass-through benefits to residents and demonstrate that these are commensurate with 20% energy bill savings, with penalties for failure to deliver. The State currently requires a similar affidavit from multifamily housing owners participating in the established New Jersey Community Solar Energy Program (CSEP).⁵ Because many multifamily affordable housing buildings do not have unit-specific utility bills, NJBPU will establish an average energy bill for a given affordable housing building based on US EIA data and input from New Jersey EDCs.
- **Residential solar:** For residential solar installations, NJBPU will require service providers to calculate savings based on an average electricity bill, verifying that it represents at least a 20% reduction. To ensure compliance, service providers will be required to submit annual affidavits to NJBPU detailing reported savings. NJBPU will review these affidavits to monitor compliance with the 20% savings requirement across all residential solar installations in the program and may conduct periodic audits to verify the reported data.

Additionally, NJBPU will review opportunities to further build on existing policies.

- **Monitoring and reporting:** NJBPU will require vendors for community solar and residential solar products to report annually on monthly savings delivered to customers. In line with other NJBPU-enacted programs, the NJSFA will include performance-based incentives where feasible, potentially through an establishment of escrows ensuring targets are met before full funding allocation. Where performance-based incentives are not practicable, the NJSFA will pursue a quality assurance program (e.g., requirements that developer documents be shared through permitting and construction phases, on-site inspections, and production reporting) to ensure quality construction and accurate yield estimates. NJBPU will use the planning period to determine exact mechanism of performance-based incentives and may opt to not incorporate performance-based incentives into NJSFA.
- **Enforcement:** NJBPU reserves the right to decrease a vendor's SREC-II allocation if vendors cannot show evidence of meeting performance thresholds, including 20% bill savings for subscribers. As a part of New Jersey's adoption of consolidated billing, effective January 2025, EDCs will be required to confirm that NJSFA-sponsored community solar projects are generating 20% savings for subscribers.

Plan to maximize LIDAC reach

⁵ For CSEP, NJBPU requires affordable housing owners/operators to sign an affidavit sent by developers attesting that savings are passed on to residents in a substantial, quantifiable, and verifiable way.

In addition to maintaining 20% bill savings, NJSFA is designed to maximize LIDAC household participation in three ways: (1) prioritizing community solar, an efficient and accessible source of solar power; (2) targeting programmatic and regulatory requirements that focus on barriers LIDAC households face; and (3) offering technical assistance and supporting community outreach.

1. Overall program design:

NJBPU will strongly emphasize community solar expansion and associated upgrades and plans to utilize 73% of NJSFA funding for this purpose.

2. Additional programmatic and regulatory requirements:

NJBPU will include new policies and requirements built to serve LIDAC households. These policies include no upper bound on the number of households that can be supported by a community solar project; a higher LIDAC subscription threshold of 100% vs 51% currently; automatic enrollment; low barriers to entry through income verification policies; and consolidated billing. NJBPU will require all NJSFA community solar projects to verify that benefits and/or credits of the power generated from a community solar system are being delivered to residential customers in the same service territory.

3. Technical support and community outreach:

NJBPU will provide technical assistance (“TA”) to developers and subscription management organizations to more easily identify and recruit LIDAC households. NJBPU will launch a state-led marketing initiative in partnership with community-based organizations (“CBOs”) to broadly advertise solar opportunities in LIDAC communities (More details are provided in the Project-Deployment Technical Assistance Strategy section).

Plan to support energy resilience and grid benefits

In evaluating proposals for the multifamily solar contractual program, NJBPU plans to prioritize proposals that include storage components as part of the scoring criteria. NJBPU recognizes that solar plus storage will maintain the stability of the electric grid, shift energy from peak production to peak consumption, and limit energy demand spikes. Combining solar and storage within the NJSFA multifamily contractual program can help multifamily households retain electricity when outages occur. Furthermore, storage technology can provide financial benefits to households by curbing energy consumption during peak demand usage.

NJBPU does not plan to offer direct NJSFA funding for storage outside of the incentive offered for multifamily solar. Rather, NJBPU intends to connect developers with funding from the forthcoming NJSIP. The NJBPU will stakeholder whether a solar-only incentive will be sufficient to make storage installations feasible on multi-family affordable buildings and may consider expanding the incentive during the planning period.

During the one-year planning period, NJBPU will facilitate stakeholder events with developers and analyze historical outage data to refine the evaluation criteria for multifamily solar projects that incorporate storage. Furthermore, NJBPU will determine the maximum capacity of storage that

can be paired with the multi-family solar contractual program and develop siting criteria to evaluate proposals with storage.

Plan to promote community ownership

1. Community Solar Equity for All pilot – A program for which the NJBPU will seek stakeholder input during the planning period to allow municipalities, CBOs and other resident-representing non-profits to partner with developers to structure equity-based subscription models. This pilot will test market demand for ownership of community solar assets and provide for potential expansion if successful. Eligibility for the program would be extended to entities that meet specific criteria to indicate their especially high LIDAC population (e.g., 20% of population is below the federal poverty line, geographically dispersed low-income households, or CEJST-identified disadvantaged communities) and would not include specific allocation per EDC, given that coverage across EDCs is already ensured by the existing New Jersey CSEP. NJBPU will engage stakeholders during the planning period to test the market demand for community ownership of community solar assets, focused on the following strategic considerations:

- Market demand for community- or municipality-owned solar (e.g., via engagement with CBOs and municipalities),
- Impact of potential municipal automatic enrollment projects on community solar subscriptions, and
- Development of consumer protection guidance and requirements for community benefit agreements between developers and community organizations representing residents.

After considering the above to inform market demand for community ownership, NJBPU will determine whether the pilot will be made permanent before the end of the planning period.

2. Residential Solar Equity for All program -- NJBPU, in partnership with New Jersey Economic Development Authority (“NJEDA”), will fund potential pathways to ownership for geographically dispersed low-income households or CEJST-identified disadvantaged communities in the one-year planning period and use NJSFA funds to subsidize the models identified. The precise approach for determining pathways to residential solar ownership, including financial mechanism, will be decided during the planning period. More details are provided in the Financial Assistance Strategy section.

Plan to support job creation and local businesses

1. Job creation and equality

All awardees must adhere to New Jersey prevailing wage standards and a commitment to remain neutral in union organizing and operations. NJBPU, in partnership with New Jersey Department of Labor (NJDOL), will use USDOL’s Good Jobs Principles to increase the availability of and access to good-paying jobs for residents living in LIDACs, especially in terms of a stable and predictable living wage, family-sustaining benefits that promote economic security and mobility, the choice to form and join a union, and safe and healthy working conditions. Additionally, applicants will be encouraged or required through program design (e.g., through evaluation criteria) to:

- Commit to participate in NJBPU workforce development initiatives. This participation could range from opening jobs to LIDAC populations to providing on-the-job training and apprenticeship;
- Commit to the creation of a community benefits plan for large-scale projects (>1 MW), in line with the standard for the current CSEP; and/or,
- Commit to, and prove of historical use of, project labor agreements, or pre-hire collective bargaining agreements negotiated between workers and employers.

2. Investment in local businesses

NJBPU will develop a supplier and vendor diversity strategy that is program-specific and focuses on returning benefits to businesses that are diversely owned and/or located within LIDAC communities. As part of the design, NJSFA will engage a broad array of local chambers of commerce to identify potential program vendors in LIDAC communities (e.g., electricians, construction firms, operations and maintenance firms). NJSFA will engage educational institutions and CBOs to ensure the broadest possible outreach to potential vendors, networks, talent, and expertise for NJSFA implementation and technical assistance. NJBPU will leverage its experience with the pilot supplier diversity strategy implemented in the New Jersey Wind Port, a purpose-built manufacturing hub to support offshore wind production. In this strategy, the State outlines supplier diversity targets among diverse-owned businesses: specifically, a 15% vendor target for minority-, veteran-, and women-owned businesses; a 25% target for small business enterprises; and a 3% target for service-disabled, veteran-owned businesses.⁶

Key activities during planning period:

To complete the meaningful benefit plan, NJBPU will undertake the following actions during the first-year planning period:

- Develop, validate, and finalize household savings calculation to ensure 20% energy bill savings for community solar expansion program, multifamily solar plus storage program, and residential solar program
- Develop, validate, and finalize monitoring/reporting and enforcement processes and mechanisms to ensure compliance with 20% energy bill savings requirement
- Align on new policies and requirements to serve LIDAC households and establish specific forms of technical support and modes of community outreach to LIDACs
- Conduct stakeholder engagement proceedings with developers to decide on the distribution of funds for storage paired with multifamily solar projects
- Conduct stakeholder engagement proceedings to test market demand for community ownership of solar assets and determine whether the community solar equity pilot will be made permanent in NJSFA
- Develop monitoring and inspection mechanisms for workforce training providers to ensure job postings and recruitment practices abide by the Good Jobs Principles

⁶ New Jersey Economic Development Authority, "Overview of Required Project Labor Agreement Provisions for At Risk Construction Management Services for the New Jersey Wind Port Project"

- Develop supplier and vendor diversity strategy for each program that focuses on returning benefits to businesses that are diverse-owned and/or located within LIDACs
- Develop guidelines to promote adoption of best practices and industry standards for quality solar installations within workforce development subaward program

2.1.2 Financial Assistance Strategy

Of the total \$156 million award, 91%, or \$141.4 million, will be allocated for NJSFA financial assistance explained in this section.

Subsidy model and impact

The Community Solar Expansion (“CSE”) grant:

The CSE grant will be run as a separate grant structure from existing SREC-II incentives NJBPU provides, ensuring developers only receive funding through one program. NJBPU's Community Solar Expansion (“CSE”) contractual program, funded with \$85.7 million, or 60% of financial assistance, aims to expand New Jersey's existing Community Solar Energy Program (“CSEP”) to reach more geographically dispersed low-income or CEJST-identified disadvantaged households. The CSE program will incentivize additional community solar projects beyond the State’s statutory mandate of at least 150 MW of new community solar generation per year from EY22 to EY27.⁷

The CSE grant will provide an upfront incentive of up to \$1.02 per watt to developers, equivalent to the value of current SREC-IIs paid out over a 15-year lifecycle. This incentive size was determined based on the SAM model from the National Renewable Energy Laboratory (“NREL”) and a NPV analysis of current SREC-IIs, which are sized at \$90/SREC-II with each SREC-II equating to a MWh of generation. The average community solar project that has been awarded in New Jersey is about 1.4 MW. Using this average, the NJBPU estimates that it would be able to award about 61 projects, with an average award of about \$1.4 million in upfront incentives once project construction is complete.

The program will be delivered through the existing CSEP structure; however, the disbursement of funds will take the form of upfront grant payments to developers. This approach will reduce administrative burden for all parties and accelerate deployment by utilizing existing structures, including project eligibility and income verification processes. As part of this program, developers will be required to demonstrate 20% bill savings to households and 100% LIDAC subscription. During the planning period, NJBPU will further refine the program design and incentive calculation in consultation with developers and other key stakeholders, including utilities. The NJBPU will also consider and update incentive levels for the CSE based on various value and capital stacks that may be available to community solar projects during the federal funding period of NJSFA.

The Grid Capacity for Community Solar (“GCCS”) competitive grant:

NJBPU's GCCS program will support projects that have received an award either through NJSFA CSE or the permanent CSEP Program, but not both. GCCS will be a competitive grant program, funded with \$28.3 million (20% of financial assistance), that aims to support community solar

⁷ P.L. 2021, C. 169 (“Solar Act of 2021”)

projects requiring significant network upgrades. This program will partially offset distribution system upgrade requirements set forth by utilities, enabling community solar deployment in areas with limited grid capacity. Grid upgrades will only be funded where non-wire alternatives are not a feasible solution. Distribution system upgrades must be specific and sized to only benefit an awarded GCCS project in order to receive NJSFA funding.

The incentive is sized at approximately \$0.40 per watt, based on estimates from Atlantic City Electric on the average cost of feeder upgrades, one of the most common upgrades required. This estimate assumes \$1 million per project for an average project size of 2.5 MW. At this rate, the \$28.3 million allocation could potentially support 28 projects of roughly 2.5 MW each, reaching approximately 8,800 households.

The program will be delivered through a competitive grant process, with funding awarded directly to community solar developers, as the proposing developer will be responsible for the costs of the necessary distribution system upgrades. Proposals will thus need to receive relevant EDC approvals subsequent to funds being dispersed. Applicants will be evaluated based on their ability to clearly indicate how enabling upgrades will achieve deployment of community solar that will reach the largest number of new LIDAC households and how the upgrades will reduce emissions and enable further DER and other broader decarbonization efforts (e.g., EV infrastructure).

Funding will only be awarded to projects that would not be otherwise supported by other assistance programs at the federal, state, and local level. Developers receiving GCCS funding will be eligible for either NJSFA CSE funding or SREC-IIs through the existing CSEP, but not both. Importantly, all projects funded through this program, regardless of additional funding sources, must comply with USEPA requirements, including 20% energy bill savings and 100% LIDAC targets.

During the planning period, NJBPU will further refine the program design in consultation with developers, utilities, and other key stakeholders. NJBPU will also coordinate with the USEPA to clarify what interconnection upgrade costs are applicable beyond usual technology purchases.

Residential solar program pathway to ownership competitive grant:

The Residential solar program will be run as a separate grant structure from existing programs, administered through the New Jersey Green Bank (“Green Bank”), a wholly-owned subsidiary of the New Jersey Economic Development Authority (“NJEDA”). NJBPU plans to provide \$9.3 million, or 7% of financial assistance, for a competitive grant program to incentivize ownership of residential solar for CEJST-identified disadvantaged homeowners or geographically dispersed low-income households. The program will facilitate residential solar ownership through Third-Party Ownership (“TPO”) -to-own arrangements, loans and credit enhancements, and potentially other financial mechanisms.

The incentive, which aims to cover the cost to developers of transferring ownership to ensure the program's viability while maximizing benefits to LIDAC households, is sized at \$1.21 per watt. This incentive was sized based on self-reported data on residential solar installations and an NPV analysis. Self-reported data on 22,995 residential solar installations under the NJBPU’s Transition Incentive Program shows that residential installations in New Jersey on average cost \$3.71 per

watt to install from 2020-22. However, smaller installations (< 8 kW) on average cost \$0.15 per watt more, so \$3.86 per watt was used in our calculations, using the assumption that LIDAC customers will generally install less solar because of lower average electricity consumption. Of this total cost, NJBPU plans to cover \$1.21 per watt. NJBPU conducted a NPV analysis to identify the value generated by a developer by year 10 to year 30 (end of life of solar assets) to account for value lost for a developer in transferring ownership, assuming a discount rate of ~7% and product degradation of 0.5% per year. The analysis assumed 1.2 MWh of solar production in year 1 per kW of capacity installed, an average solar installation of 8 kW of capacity, 0.5% degradation per year, SREC-II value of \$85 per MWh based on current residential net metering credit, \$3,860 per kW cost, ITC tax credit of 40% (30% + 10% adder since reaching LIDAC household as defined by DOE), 20% bill savings for the homeowner, offset of 70%, and value of power at \$160 per MWh based on New Jersey's historical data. Using these inputs, NJBPU determine the cost to a developer of transferring ownership would be roughly \$1.21 per watt.

To ensure NJEDA and the Green Bank can administer these incentives, NJBPU will seek to enter a Memorandum of Understanding ("MOU") with NJEDA to facilitate transfer of funds and program administration. The MOU will articulate that NJEDA and Green Bank, as a responsible party for the distribution of NJSFA funds, will meet USEPA's reporting requirements, and other programmatic terms and conditions. It will also articulate that if the program does not have sufficient demand or deployment of funds by the third performance period year, its funding may be reallocated to CSE. The Green Bank, in collaboration with the NJBPU, will issue a Request for Proposals ("RFP") to select likely one to two service providers. Selected financing providers will be responsible for originating residential opportunities, financing them, installing or contracting for installation of the solar systems, and meeting USEPA requirements (e.g., 20% energy bill savings). The Green Bank will potentially underwrite the financial service provider to minimize financing risk. The specific underwriting mechanisms will be determined during the planning period.

NJBPU and NJEDA will develop qualification criteria during the planning period for the RFP for solar providers. NJBPU anticipates that the TPO-to-own option will be the more effective financing mechanism since TPO provider plan will be able to claim ITC credit and pass benefits to resident. However, NJBPU and NJEDA will seek providers that can facilitate multiple products including TPO-to-own, loan products, credit enhancements, and other financial mechanisms to maximize reach to LIDAC households. NJBPU may consider how credit enhancements (e.g., loan loss reserve) could be incorporated into a loan product to minimize risk for the lender and ensure low financing costs for households. For TPO-to-own arrangements, NJBPU will require a contractual agreement guaranteeing transfer of ownership after a specified time period. For both loans and TPO products, NJBPU will pay the incentives upfront upon completion of solar construction. The incentive will flow directly to the entity providing the financing, whether it is a TPO product or loan product. Additionally, SRECs-IIs and net metering credits will be allocated through existing residential solar program. SREC-IIs would be allocated to the financing party until the TPO transfer, at which point they will be allocated directly to the homeowner.

NJBPU plans to also use the planning period to reach several key design and administration decisions, particularly around RFP criteria, potential supplemental funding from NJEDA and Green Bank, and education and outreach. The Green Bank aims to have an RFP for service providers

during the planning period, with a target as soon as the end of Q1 2025, with funding to homeowners potentially beginning in Q3 2025. NJBPU and NJEDA will explore the potential for NJEDA to supplement NJSFA funding to enhance the financing product and enable further cost reduction for residents. NJBPU will also plan to use the planning period to develop a campaign with NJEDA to market this program to LIDAC households as defined earlier by the CEJST mapping tool/geographically dispersed low-income households. NJEDA will work closely with service providers to ensure compliance and consumer protection.

Multifamily solar competitive grant and storage:

NJBPU's multifamily solar program will run as a separate grant structure from existing programs, funded with \$18.1 million, or 13% of financial assistance, aims to incentivize solar deployment for affordable housing, bridging the gap in net metering credits between commercial rates for master-metered buildings and residential rates.

The program offers a direct incentive of 43 cents per watt to developers, covering 80% of the identified gap, about 54 cents per watt, in net metering credits. NJBPU determined this incentive size using a discounted cash flow analysis to determine the difference in value received by a project owner from commercial versus residential rates over the 15-year life cycle of SREC-IIs. For projects including storage, NJBPU will favor those incorporating up to 2 hours of storage, or 2 kWh per kW of solar, aiming for a total deployment of 85 MWh of storage. This program will complement New Jersey's Storage Incentive Program ("NJSIP"), supporting the state's target of 2,000 MW in installed energy storage by 2030.

The program will be delivered through a competitive grant process, with funding awarded directly to developers. Evaluation criteria will include the project's ability to provide meaningful benefits to residents through resiliency and offset peak load charges. Residents in a master-metered apartment building may pay for electricity included in rent or as a proportion of the building's total bill. If the resident does not have a direct responsibility for energy costs, the building owners would be required to pass the benefits to the tenants in a specific, substantial, identifiable, and quantifiable manner.

During the planning period, NJBPU will stakeholder this incentive size with developers and owners of master-metered multi-family buildings to confirm that this meets the threshold required to incentivize deployment. Additionally, NJBPU will conduct stakeholder proceedings to estimate the capacity of storage that will be deployed based on this incentive and evaluate whether storage is feasible with solar-only incentives.

Plan to align NJSFA with existing income-based assistance programs

NJBPU will use the planning period to coordinate directly with other utility and income-based assistance programs to educate, and where appropriate, auto-enroll NJ residents in community solar subscriptions. NJSFA will compliment and expand existing assistance programs the NJBPU regulates to fulfill Solar for All specific objectives. The plan to align NJSFA with existing assistance programs will avoid the duplication of existing subsidies, tax credits, and other sources of financing. NJSFA will only support the deployment of assistance programs that would have not occurred otherwise. Examples of such programs to coordinate NJSFA with are:

- Comfort Partners is a joint program between NJBPU and New Jersey's electric and gas utilities that provides free energy efficiency upgrades to households below 250% of federal poverty level in New Jersey. NJBPU will leverage the existing outreach done through Comfort Partners to provide communication directly to LIDAC households about opportunities to benefit from NJSFA programs.
- Moderate Income Weatherization is a utility-run program that offers weatherization assistance to households that make between 250% and 400% of the federal poverty level. Participants in this program would be made aware of NJSFA programs via educational materials provided to them by contractors and CBOs.
- Federal housing assistance: NJBPU will work with HUD and the New Jersey Department of Community Affairs (“NJDCA”) during the planning period to ensure that any savings residents realize due to community solar do not impact their eligibility to receive federal housing assistance.

Operations and maintenance plan

As part of the competitive grant for residential solar, NJBPU will prioritize applications that have commitments to mitigating the operations and maintenance (“O&M”) burden for LIDAC homeowners when they receive ownership of the asset through ensuring recent maintenance upgrades prior to ownership transfer. SREC-II incentives were sized to incorporate the cost of O&M to the developer so the expectation is this will be covered through NJSFA funding, which was sized based on the existing SREC-II incentives.

Finally, NJBPU will coordinate with the NJDEP Solar Panel Recycling Commission, which was established in 2019 to investigate opportunities for recycling and other end-of-life (“EOL”) management methods for photovoltaic (“PV”) and other solar generation structures, and to develop recommendations for the legislative, administrative, or private sector. The preliminary recommendations that NJSFA could support relate to the construction of Solar Panel Recycling Centers, advanced recovery fees or extended producer responsibilities, extended use and reuse of solar panels, and a potential ban on the disposal of EOL solar panels in landfills.⁸ Solar for All funding will not be provided directly for such construction. This will be further designed during the planning period.

Key activities during planning period:

To complete the financial assistance strategy, NJBPU will perform the following actions during the first-year planning period:

- Test incentive sizes of Community Solar Expansion (“CSE”) grant, Grid Capacity for Community Solar (“GCCS”) competitive grant, residential solar program, and multifamily solar + storage program, as well as other components of programs with developers and other key stakeholders
- Test potential for coordinating the multifamily + storage program with the NJSIP that NJBPU is currently developing

⁸ Report of Investigation of Recycling and other Management Methods for Solar Panels, and Recommendations by the New Jersey Solar Panel Commission, November 29, 2023.

- Collaborate with NJEDA to develop qualification criteria for the residential solar program RFP for solar financing providers
- Reach several key design and administration decisions for residential solar programs, particularly around RFP criteria, supplemental funding from NJEDA/Green Bank, and education and outreach
- Coordinate directly with other utility and income-based assistance programs to educate, and where appropriate, auto-enroll NJ residents in community solar subscriptions
- Develop and pursue an MOU with NJEDA to enable transfer of funds to Green Bank for residential solar program
- Work with HUD, NJDCA, and NJEDA to create plans to avoid impacts to housing assistance and plans to protect housing stock values
- Design recycling, lifetime of assets terms, and audits of asset plan with the NJDEP

2.1.3 Project-Deployment Technical Assistance Strategy

Workforce development plan

NJBPU intends to allocate an up to \$6.8 million subaward for NJDOL to administer a NJSFA workforce development program that includes augmenting three existing NJDOL programs focused on apprenticeships, pre-apprenticeships, and on-the-job training, as well as establishing a new Innovation Fund to scale new workforce solutions, explained in detail below. NJBPU will design these programs in partnership with the NJDOL and will seek to transfer funds via an MOU; once both parties enter into the MOU, the New Jersey Department of the Treasury will transfer the funds from NJBPU to NJDOL. The program will close critical workforce gaps that could delay implementation of NJSFA-funded projects. Additionally, given that NJDOL’s three existing programs already operate around the USDOL’s Good Jobs Principles, the program will increase availability of, and access to, good-paying jobs for residents living in LIDACs, especially in terms of a stable and predictable living wage, family-sustaining benefits that promote economic security and mobility, the choice to form and join a union, and safe and healthy working conditions.

NJBPU will perform an initial analysis to identify solar-related workforce gaps and assess the job quality of these roles during the planning period. The analysis includes the following activities: (1) mapping critical roles required to design, build, operate and maintain community and residential solar projects and estimating the workforce size and gap in New Jersey; (2) prioritizing occupations based on job quality and potential to fill them with apprenticeships; (3) deepening discussions with state-based employers and organized labor around partnering on workforce development initiatives.

To address the gaps, NJDOL will allocate funding to the three existing programs described below, enabled by an MOU between NJDOL and NJBPU:

- **Growing Apprenticeship in Non-traditional Sectors (“GAINS”)—44%, or \$3 million, of workforce funding.** GAINS, NJDOL’s largest apprenticeship grant program, provides New Jersey businesses/organizations or current registered apprenticeship sponsors in targeted sectors with support for new or existing Registered Apprenticeship program development. This support generally comes in the form of funding to offset administrative costs incurred

while creating the Registered Apprenticeship Program or while training the new apprentice and provides a 50% wage reimbursement for the first twelve months of newly hired apprentices' employment for occupations paying a starting wage of at least \$16/hour. Within GAINS, 100% of the participants must be placed into a USDOL approved registered apprenticeship program. NJSFA funds will be allocated for Registered Apprenticeships at organizations in and adjacent to the solar industry to cover mentoring costs, on-the-job training costs, classroom costs (e.g. instructors and materials), and supportive service costs to assist apprentices once they are placed into employment. NJDOL will leverage the Business Services and Industry Partnerships teams for stakeholder engagement efforts. NJDOL's Business Services Team meets with employers to discuss their immediate and future workforce needs and provides concierge services, helping employers by directing them to available resources to meet specific workforce needs; this includes talent acquisition services, state hiring and training incentives. The Industry Partnerships team focuses on mobilizing business leaders from specific regions in New Jersey to build bridges between businesses and public agencies, promoting business growth with the assistance of public resources. To develop apprenticeship programs, these two teams will liaise with industry associations, solar employers, training programs, and other stakeholders to identify potential partners and provide technical assistance to develop solar-related Registered Apprenticeships. NJBPU and NJDOL will spend a portion of its planning period interacting with developers to better understand workforce gaps and opportunities for LIDAC workers.

- **Pre-Apprenticeship in Career Education (“PACE”)—15%, or \$1 million, of workforce funding.** Pre-apprenticeship programs funded through PACE provide education and training that leads to one of the following outcomes:
 - Admission into a USDOL Registered Apprenticeship program;
 - Employment with a starting wage of not lower than \$16 per hour;
 - Admission into a post-secondary college, or occupation-specific career training.

The PACE program covers the costs associated with a pre-apprenticeship program that has a documented partnership with at least one Registered Apprenticeship program sponsor and expands the participant's career pathway opportunities with industry-based training coupled with classroom instruction. Per existing NJDOL program requirements, PACE will require each NJSFA-sponsored pre-apprenticeship program to have at least one documented partnership with a Registered Apprenticeship program sponsor committed to hiring from that program. NJSFA funds will provide stipends to students to cover incidental costs of attending training and supportive services, such as childcare, transportation, and high school diploma/GED attainment. All supportive services offered by PACE, including GED exam funding, will be directly tied to preparing participants for careers in the solar industry by incorporating existing design principles required by PACE. Currently, all pre-apprenticeship programs funded by PACE are explicitly designed to train and equip students with capabilities to secure a Registered Apprenticeship in priority fields; all NJSFA-sponsored pre-apprenticeship programs will be directly tied to capabilities necessary to secure jobs in solar-related fields.

- **On the job training (“OJT”) – 15%, or \$1 million, of workforce funding.** OJT is a subsidized work-based learning opportunity designed to assist New Jersey employers in developing their workforce. This program encourages employers to hire new workers by assisting them with the costs of training. Participants get a paid job, training, and an opportunity to learn a new skill, while the employer receives reimbursement for part of the participant’s salary. Employers are subsidized at a rate of 50% of straight time wages during an approved training period. NJDOL and NJBPU are exploring potential use cases for OJT for NJSFA, including certification of solar projects. These use cases will be ideated, validated, and aligned with key stakeholders during the one-year planning period. Potential use cases to be explored include:
 - Partnerships with employers installing solar for upskilling existing employees or bringing on new capacity where a clear training program exists.
 - Solar project certification partnership with IEEE-1547 Standards Association, which runs a training and certification track for solar inverter design and compliance testing in compliance with IEEE-1547 standards. This would involve NJDOL partnering with IEEE-1547 on a credential-based program to support New Jersey residents to obtain professional licensing to be able to certify installed solar projects prior to utility authorization to operate. This program will also incorporate Community College curricula and represents one of several ways NJDOL could invest in on-the-job training programs, provided there is clear employer demand and assurance of employment outcomes for students.

NJBPU intends to transfer \$5 million of the overall NJSFA workforce development budget to the NJDOL at the end of the planning period. With the \$5 million alone for NJDOL to expand its existing workforce training programs, NJSFA will be able to train about 416 new individuals and create about 333 new jobs in the New Jersey solar industry. These estimates are based on the NJDOL’s current training program reports that it takes about \$12,000 to train an individual through its GAINS program and that there is about an 80% matriculation from GAINS trainees completing the training program and getting placed into full-time employment for the industry they train in.

During the planning period, NJDOL and NJBPU will also evaluate other existing programs that may be suitable for NJSFA funding, including the Upskill program for incumbent worker training, which are block grants to employers to help defray the cost of training existing employees.

Additionally, NJBPU will work with NJDOL to develop an innovation fund:

- **Innovation Fund – \$1.8 million.** NJBPU will earmark about 25% of workforce development funds in an “Innovation Fund” to fund initiatives that do not fit into the above three formal programs. Unlike the three existing programs, NJBPU will be responsible for administering the Innovation Fund in coordination with NJDOL and NJEDA. These investments will, among other things, help employers build training programs; provide seed funds for collaborative partnerships among employers, organized labor and training institutions; and add additional funding for outreach and engagement in **CEJST-identified** disadvantaged communities. To identify, build, and market potential initiatives funded through the

Innovation Fund, New Jersey will coordinate directly with several workforce and education organizations, including but not limited to:

- New Jersey Council of County Colleges
- IEEE-1547
- Mid-Atlantic States Career and Education Center
- New Jersey State AFL-CIO

New Jersey will partner and coordinate with the above organizations and others to understand workforce and skills gaps affecting New Jersey’s solar industry, align on high impact initiatives that could meaningfully address workforce challenges and scale if receiving investments from the Innovation Fund, and ensure sufficient marketing and uptake of newly funded initiatives. NJBPU, NJDOL, and NJEDA will spend a portion of the one-year planning period defining the guidelines of the Innovation Fund in terms of initiative criteria and developing an initial understanding of solar workforce, manufacturing investment, and skills gaps that the Innovation Fund could reasonably impact.

If the Innovation Fund does not receive proposals of sufficient quality, the funding will be repurposed for the above three programs. This decision will occur during an evaluation of the Innovation Fund in year 3 of the Solar for All performance period, at which point funding reallocation would occur if the evaluation warrants reprioritization.

Technical assistance plan

NJBPU will invest up to \$1 million in NJSFA funding for technical assistance measures to support the deployment of solar projects funded by NJSFA. NJBPU will use the planning period to determine the most effective solutions to invest in but will consider solutions to 1) augment existing grid modernization efforts focused on expediting the interconnection process and/or 2) offer technical assistance for developers on project siting, land-use, and permitting to streamline and expedite these processes for developers.

1) Interconnection technical assistance

NJBPU’s existing Grid Modernization process is aimed at reducing barriers to interconnection by introducing transparency and efficiency into the technical/cost/scheduling process, expanding hosting capacity through technology and infrastructure insertion, and evaluating more efficient capital allocation and utilization for the modernized grid. NJBPU recently stood up a Grid Mod Forum with workgroups tackling the complex interdependencies in rules development and revision in order to achieve meaningful consensus-driven reform in the fastest time period. The groups include the electric utilities along with recognized expert organizations who are at the forefront of grid modernization. During the planning period, NJBPU will identify potential funding opportunities across several key technical assistance “pilots” related to expediting the interconnection process for solar deployed as a result of Solar for All funding, which will build on the work the Grid Modernization Forum is already leading. Potential ideas include:

- Advancing automation of interconnection processes through potential use of artificial intelligence, which could proactively identify/suggest cluster formation for

multiple adjacent developer applications and/or inform optimal distribution system investment to maximize hosting capacity increases.

- Evaluation of potential tariff constructs that could enhance the adoption level of DER within underserved communities through monetizing community solar/storage grid services.
- Removing cost barriers to a single, software-enabled interconnection solution, standardizing the application process, digitizing what would otherwise require in-person interactions, and creating broader visibility into key process efficiency metrics.
- Augmenting NJBPU staff to field developer inquiries and provide support with interconnection applications, including potentially directly liaising with EDCs on behalf of specific projects.
- Establishing a third party, centralized database with simplified applicant data entry mechanisms to track the full lifecycle and disposition of all interconnection applications. Particularly, capturing reasons why applications were abandoned or did not successfully complete on time.

2) **Project siting, land-use, permitting, building codes, inspection, and quality control**

NJBPU will approach technical assistance for developers on project siting, land-use, and permitting by leveraging critical enablers to streamline and expedite the processes for developers. This will include partnering with the Office of Permitting and Project Navigation (“OPPN”) within NJDEP9 to identify potential areas NJBPU can invest in to expand existing enablers including:

- NJDEP’s “NJ Community Solar PV Siting Tool” and “Guidebook” to support developers in identifying preferred areas for siting PV projects. The tool visually demonstrates which Census Block groups have higher shares of low-to-moderate income populations and incidence of landfills or brownfield development areas and could be adopted for Solar for All context.
- NREL’s SolarApp+ could be subsidized through NJSFA funding to cover the fee municipalities may incur to adopt SolarApp+ (i.e. staff time and integration with existing software) and encourage adoption by municipalities.

During the planning period, NJDEP and NJBPU will look into combining current efforts within the NJDEP to ensure project siting and permitting of new NJSFA projects also take into consideration climate hazards and future building of resilient assets. Already, the NJDEP and NJBPU work in close collaboration for the State’s soon-to-be launched Dual Use Pilot Program established pursuant to the Dual-Use Solar Energy Act of 2021 (“Dual-Use Act”) and have solar siting preferences that guide the CSEP.¹⁰ NJBPU will leverage this relationship to carry forward lessons learned into NJSFA.

⁹ OPPN’s approach is to ensure projects receive proactive support and communication to ensure timely, predictable, and positive permit decisions. In the last few years OPPN has shifted focus to renewable energy projects to further Governor Murphy’s goal of 100% clean energy by 2035. OPPN does this by providing an early, informal review and comments on project concepts before applicants invest time and money into more detailed project design

¹⁰ L. 2021, c. 170.

NJBPU plans to engage developers in the planning stage of the program to identify gaps to the current state of technical assistance and will accordingly plan to add technical assistance capacity. If, by year 3 of the performance period, NJBPU does not identify effective use of funding for technical assistance related to interconnection or project siting, land-use, permitting, building codes, inspection and quality control, NJBPU will plan to reallocate the funding to NJDOL's three existing workforce programs described above or the CSE program.

Additionally, NJBPU will use the planning period to identify a plan to ensure inspection and quality control, potentially through the performance-based incentive model of the program, as discussed in the Meaningful Benefit Plan. NJBPU reserves the right to implement its own inspection protocol, including potentially inspecting assets under construction or in operation or asking developers to provide construction documents for quality control purposes as needed.

Key activities during planning period:

To complete the project-deployment technical assistance strategy, NJBPU will undertake the following actions during the first-year planning period:

- Develop and align on an MOU with NJDOL to enable transfer of funds to NJDOL for workforce development programs
- Perform initial analysis to identify solar-related workforce gaps and assess job quality of roles
- Conduct stakeholder engagement with developers to better understand workforce gaps and opportunities for LIDAC workers
- Ideate, validate, and align use cases of NJDOL's on-the-job training program with key stakeholders
- Defining the guidelines of the Innovation Fund in terms of initiative criteria
- Develop an initial understanding of solar workforce and skills gaps that the Innovation Fund could reasonably impact
- Identify potential funding opportunities for interconnection, project siting, and permitting across several key innovative pilots
- Collaborate with NJDEP to better understand how NJBPU can invest a portion of its NJSFA funds into the NJ Community Solar PV Siting Tool

2.1.4 Equitable Access and Meaningful Involvement Plan

Plan to serve diverse markets

To ensure NJSFA adequately serves diverse LIDACs, NJBPU will track a comprehensive set of program metrics and partner with CBOs to support outreach to various LIDACs. Specifically, NJBPU will track and monitor program impact for and engage the following communities:

- **Rural, suburban, and urban communities:** NJBPU will explore tracking funding disbursement in different Census tracts to ensure energy-burdened LIDAC households are receiving benefits; these LIDAC households are likely to be disproportionately rural. NJBPU will also partner with CBOs based in geographies where current solar service levels are below target.

- **Energy communities:** NJBPU will explore how to leverage program design (e.g., evaluation criteria) to ensure energy communities are reached. In some cases, NJBPU may require that:
 - Community solar projects commit to maintaining 10%+ of subscriptions to energy communities OR to projects built in energy communities
 - Residential projects serve residents of energy communities
- **LIDAC communities with limited English Proficiency:** NJBPU will explore partnering with CBOs to support outreach to underserved LIDAC communities via communication resources for non-English speaking residents about NJSFA enrollment benefits.
- **Renters and other households unable to install rooftop solar directly:** During the planning period, NJBPU will develop and issue guidance for multifamily projects on how to pass on savings to residents.
- **Residents of manufactured homes on leased sites:** NJBPU will partner with the NJDCA to identify population data and set service targets. NJBPU will dedicate a portion of its planning period to scope what data is available for this population and collaborate with NJDCA and other stakeholders to determine sufficient service targets.
- **New Jersey state-recognized tribal communities:** NJBPU will engage and partner with various New Jersey state-recognized tribal communities to support outreach to indigenous populations, including the Nanticoke Leni-Lenape Tribal Nation, Ramapo Lenape Nation, and Powhatan Lenape Nation.

During the planning period and through implementation, NJBPU will ensure the program connects underserved communities to solar products across program pillars by:

- Partnering with CBOs for feedback on engaging the populations they represent and educating residents on potential savings opportunities. An initial list of potential partners includes:
 - Ironbound Community Corporation
 - NJ Environmental Justice Alliance
 - Vote Solar
 - Neighborhood Sun Benefit Corp
 - New Jersey Policy Perspective
 - NRDC
 - NJ Sierra Club
 - New Jersey LCV
 - Environmental Defense Fund
 - Environment NJ
 - NJ PEEC (NJ Progressive Equitable Energy Coalition)
 - Neighborhood Sun Benefit Corp
- Partnering with other income-qualifying programs to pre-qualify and educate potential customers
- Supporting developers to prioritize underserved population categories listed above, including but not limited to:
 - Publishing public maps of areas of the State that qualify for NJSFA funds, and
 - Maintaining the existing CSEP requirement that developers include a Community Engagement and Subscriber Acquisition Plan

- Standing up a program monitoring function to track program performance against targets listed above.

NJBPU will explore various ways to partner with CBOs to achieve the above, including:

- Convening a series of stakeholder meetings to gather input on program design and implementation
- Establishing feedback mechanisms for CBOs to report on community responses and suggest program improvements
- Collaborating on developing outreach materials for diverse LIDAC communities
- Engaging CBOs in identifying and addressing potential barriers to LIDAC participation in solar programs
- Supporting CBOs in conducting local workshops and information sessions about NJSFA programs
- Leveraging CBO networks to disseminate information about NJSFA programs and opportunities

Participatory governance plan

NJBPU will conduct extensive stakeholder engagement and develop technical assistance for providers during its planning period to ensure program-level and project-level participatory governance is a central component of its NJSFA programs. Key planning period activities include:

- Formalizing structures to ensure NJSFA program design is informed by New Jersey stakeholders and meets interests of New Jersey residents
- Conducting ongoing stakeholder engagement across channels to boost awareness and maximize subscription to services, including after the planning period ends
- Finalizing the design of and offering technical assistance to developers to support customer acquisition, with a focus on LIDAC households
- Developing and aligning on a roadmap for community engagement and education activities
- Publishing a full straw proposal to stress test design decisions with key stakeholders, including communities served
- Scheduling group and bilateral meetings with stakeholders, including but not limited to:
 - CBOs representing LIDAC populations in different geographies, renters, and other relevant LIDAC populations (e.g., Ironbound Community Corporation)
 - Residents and resident associations (e.g., Housing and Community Development Network of New Jersey)
 - EDCs and utilities (e.g., Rockland Electric Company, Jersey Central Power & Light, Atlantic City Electric, and PSE&G)
 - Developers and solar employers (e.g., Advanced Solar Products, Solar Landscape, Coalition for Community Solar Access, Soltage)
 - Advocacy groups (e.g., NJ Environmental Justice Alliance, Vote Solar, NJ Policy Perspective, NJ Sierra Club, and NJ League of Conservation Voters)

Program-level participatory governance:

NJBPU plans to establish an NJSFA Advisory Council (“Council”) or similar participatory governance model for community solar deployment to ensure transparency and commit to accountability in

serving LIDACs. NJBPU will spend a portion of the planning period determining how the Council will be structured – including finalizing its participants, the council’s function, key milestones for decisions, and necessity to have a Council. Once this is determined, the scope of work and costs for a Council will be provided to the USEPA at the end of the planning period.

The Council will operate as a working group for the NJSFA program, potentially convening quarterly to give feedback and input on NJSFA program planning and operations. Meetings will begin during the planning period to ensure the Council is able to provide input on ongoing program design questions and will continue through NJSFA’s full period of performance. The Council will help NJBPU implement its mission to provide access to solar for LIDACs and include a diverse set of stakeholders, including local businesses related to NJSFA deployment (e.g., developers) and CBOs.

NJBPU plans to include several types of CBOs in the Council, including:

- LIDAC-serving social organizations, labor organizations, or unions,
- Resident and tenant groups,
- Consumer protection organizations, and
- Municipal delegates (e.g., local officials, permitting office representatives)

In addition to quarterly convenings of the Council during implementation, NJBPU will seek public feedback on a regular basis throughout the period of performance, including through public meetings and via the website. Public feedback will be solicited more frequently in the early stages of NJSFA implementation. NJBPU reserves the right to adjust the frequency of or arrangement of the Council and other forms of participatory governance based on factors such as program performance, stakeholder feedback, emerging challenges or opportunities, and the evolving needs of LIDACs throughout the implementation process.

Project-level participatory governance:

During the planning period, NJBPU will engage with CBOs interested to serve as facilitators of solar cooperatives, or groups of residents seeking not only to have equity in a community solar project, but also to operate and maintain it. NJBPU will encourage such cooperatives to provide a participatory governance plan at the project-level, including plans to: ensure consumer protections (e.g., flexibility for subscribers to sell equity and leave a subscription), enable participatory decision making (e.g., for maintenance-related investments on a project), and recruit subscribers from CEJST-identified disadvantaged communities or geographically dispersed low-income households.

During the one-year planning period, NJBPU will engage stakeholders to determine process for establishing solar cooperatives and align on solar cooperative best practices to share with solar cooperatives once they are established.

Community engagement plan

NJBPU will stand up various community engagement functions, building on existing community engagement practices. NJBPU will dedicate a portion of the one-year planning period to engage

stakeholders and make design decisions in the development of various efforts. NJBPU is currently exploring several approaches to such engagement, which may include:

- Direct outreach to residents of LIDAC communities based on the definition being utilized for each program and inclusive of all groups referenced under “plan to engage diverse markets” (e.g., non-English speakers, residents of manufactured homes, etc.)
- Indirect outreach via engagement with CBOs, including service organizations, advocacy groups, faith institutions, educational institutions, etc., and
- Outreach to environmental and environmental justice organizations leveraging their robust membership bases in the State to amplify public stakeholder opportunities.

NJBPU will explore potential investments in a community engagement program which may include the following elements, to be determined and refined with stakeholders during the one-year planning period:

- NJBPU-hosted public stakeholder or community events:
 - In year one, NJBPU will host at least one public stakeholder or community event on program design in each region (north, central, south) that will be available in multiple languages to ensure accessibility to inform communities on the NJSFA opportunity and associated community benefits. NJBPU will continue to engage with LIDAC communities in these sessions over the lifecycle of the program
- Channel partner-hosted public events: NJBPU will partner with CBOs, similar to NJBPU’s current partnership with Isles, Inc. for the Comfort Partners program, to spread awareness among their networks on NJSFA opportunities
- Digital and print marketing: NJBPU will invest program administration funds in a digital and print marketing campaign targeted at LIDAC zip codes and neighborhoods in multiple languages across multiple digital channels and print media
- Online materials: NJBPU will partner with vendors and/or New Jersey’s Office of Innovation, which works across State agencies to create tools that enable the public to better participate in the State’s programs, to support the creation of a public facing website to share information with residents and stakeholders on the State’s solar programs and encourage public engagement.

Strategy for customer acquisition and management

Customer acquisition:

NJBPU will continue to encourage developers to recruit subscriptions at a project-level, including maintaining the current CSEP requirement that developers to submit formal Subscriber Acquisition and Community Engagement Plans. NJBPU will also implement a program-level strategy for customer acquisition and management to ensure that developers can reach these target markets. The key pain points for customer acquisition and proposed activities to mitigate them are in the table below and will constitute the customer acquisition and management strategy; these activities will be refined for program-specific context in consultation with stakeholders during the one-year planning period.

Pain point	Proposed Program activity to mitigate pain point
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<p>Lack of developer awareness on where LIDAC-populations are and how to recruit for projects</p>	<ul style="list-style-type: none"> • NJBPU will continue to invest in the New Jersey Community Solar Project Finder and use it to facilitate subscribers to projects with available capacity. This is a tool co-developed with a New Jersey CBO, Sustainable Jersey, that both provides easy-to-understand information on community solar and its benefits, and provide links to help subscribers sign up • NJBPU will shortlist CBOs that can partner with developers to increase project subscriptions (and will consider funding to CBOs that can provide consistent subscriber recruitment support)
<p>Lack of potential customer awareness of community and residential solar benefits</p>	<ul style="list-style-type: none"> • NJBPU will fund and launch a state-wide marketing campaign leveraging partnerships with CBOs to increase literacy. Components of this campaign may include NJBPU-hosted events, partner-hosted events, digital and print marketing, and online materials • NJBPU will structure partnerships with other federal / state programs with income-based eligibility to identify potentially qualifying households and market NJSFA opportunities.
<p>Lack of clarity on pathways to sign up for these benefits (and associated consumer protections)</p>	<ul style="list-style-type: none"> • NJBPU is advocating for legislation to allow implementation of an “opt out” policy where municipalities can sponsor community solar projects and automatically enroll eligible residents in their jurisdiction. If passed, this policy would take effect in January 2025 and could significantly increase LIDAC-qualified subscriptions to community solar projects • NJBPU will coordinate guidance from NJSFA and CSEP to developers to simplify and standardize community solar sign up and billing practices
<p>Language barriers</p>	<ul style="list-style-type: none"> • NJBPU will invest in additional marketing materials in multiple languages based on population demographics of target LIDAC areas • NJBPU will leverage channel partners to discuss NJSFA opportunities with non-English speaking households

The following household types will be eligible for NJBPU programs:

1. Households located in LIDAC-qualified Census Block Groups (per the CJEST Mapping and EJ Screen tools) will automatically qualify for NJSFA participation.
2. Households that attest to having incomes at or below the greater of:
 - For metropolitan areas: (1) <80% AMI and (2) 200% of the federal poverty level will qualify for NJSFA participation.
 - For non-metropolitan areas: (1) <80% AMI; (2) <80% statewide non-metropolitan area AMI; and (3) 200% of the federal poverty level will qualify for NJSFA participation

For households required to attest, NJBPU will provide a standard self-attestation form. At the time of subscription verification, 100% of subscribers must initially qualify as LIDAC. Subscription organizations are responsible for maintaining this 100% LIDAC requirement by prioritizing new LIDAC subscribers whenever the initial verification occurs. Any shortfall in meeting this requirement must be reported to NJBPU, along with a corrective plan to regain full LIDAC compliance. Project owners who do not maintain this standard may be subject to financial penalties based on the severity of the shortfall and the promptness of corrective actions.

Key activities during planning period:

To complete the equitable access and meaningful involvement plan, NJBPU will undertake the following actions during the first-year planning period:

- Align on program metrics to track to ensure NJSFA programs are adequately serving diverse markets and communities
- Ensure federal reporting serves as a mechanism to track program performance against targets
- Conduct ongoing stakeholder engagement across channels to boost awareness and maximize subscription to services, including after the planning period ends
- Finalize the design of and offering technical assistance to developers to support customer acquisition, with focus on LIDAC households
- Develop and align on a roadmap for community engagement and education activities, including adoption of Community Benefit Agreements during project siting
- Publish a full straw proposal to stress test design decisions with key stakeholders, including communities served
- Schedule group and bilateral meetings with stakeholder groups
- Finalize design of NJSFA Advisory Council, including its participants and key milestones
- Align on solar cooperative best practices to share with solar cooperatives once they are established
- Work with stakeholders to refine the key activities comprising the customer acquisition and management strategy for program-specific contexts

Section 3: Fiscal Stewardship Plan

Waste, fraud, and abuse plan

NJBPU has strong policies for fiscal stewardship which help protect against waste, fraud, and abuse in disbursement of federal funds. NJBPU will spend a portion of the planning period ensuring that the following NJSFA program design elements are properly incorporated into the administration of each of the NJSFA programs:

- A requirement that developers fully construct projects before awarded funds are disbursed to them
- A requirement that entities participating in the multifamily housing program sign affidavits detailing how they will pass savings benefits onto consumers

- A process to audit participants and a mechanism to withdraw funds if the participant is found to be non-compliant with NJSFA program standards
- Implementation of income verification processes

NJBPU will ensure that all entities receiving NJSFA funds are aware of and comply with the New Jersey Conscientious Employee Protection Act ("CEPA"), which makes it unlawful for an employer to discharge, suspend, demote, or take any other adverse employment action against an employee because that employee has reported an employer's violation of the law, a rule or regulation issued under the law or other workplace activities that are potentially harmful to the public and/or the environment. CEPA would apply to any employer in New Jersey that wins or deploys NJSFA funding.

To ensure responsible fiscal stewardship, NJBPU will deploy an oversight strategy over subaward programs that includes regular financial reviews, random compliance audits, and regular performance evaluations. This may involve site visits, detailed expenditure reviews, and performance progress reports to confirm alignment with authorized uses of funds. Subrecipients will be required to submit regular financial reports detailing their expenditures against the approved budget. Any deviations from authorized fund use will be promptly investigated, with corrective actions taken as necessary.

NJBPU, itself, will adhere to the State's Conflict of Interest Law and ensure all components of the NJSFA will be conducted in a manner that upholds the respect and confidence of the public.¹¹ All members involved with the design and implementation of NJSFA will avoid conduct which is in violation of the public trust or creates a justifiable impression among the public that such trust is being violated.

Additionally, for all pilot programs funded by NJSFA (i.e., Innovation Fund, technical assistance, Community Equity Solar for All pilot, residential solar pilot), NJBPU will establish mechanisms and processes to reevaluate program effectiveness and impact after 3 years, at which point pilot funding may be reallocated to other programs, namely CSEP or workforce development initiatives. NJBPU understands that this reevaluation of the NJSFA will require USEPA adjudication before and actions are to result from the analysis. NJBPU will ensure that any reallocation of funding will not result in a negative impact to the score, ranking, or selection of the State's original award for federal Solar for All funding.

Consumer protection plan

NJBPU has implemented extensive consumer protections under the current community solar program and will extend them to each component within its NJSFA program. These provisions address the NOFO criteria and are viewable in N.J.A.C. § 14:8-9.10. These protections include, but are not limited to:

- Requirements on fee and charge transparency, changes in management of subscriber organizations, penalties for misleading or deceptive marketing, sales practices, among others

¹¹ N.J.S.A. 52:13D-13(g) ("New Jersey Conflict of Interest Law").

- A requirement that subscribers are guaranteed a minimum discount of no less than 15% in the current program – this would be raised to 20% for all NJSFA-sponsored projects
- A policy that subscribers cannot be charged any termination fees for ending their subscriptions with appropriate notice by the next billing cycle
- A requirement that developers must provide NJBPU with detailed information on residents and geographies served and average bill savings on a regular basis
- Issuance of detailed guidance on savings calculations and hire an external auditor to ensure consumers are realizing savings, implement income verification processes, and issue new guidance specific to residential solar consumer protections

During the one-year planning period, NJBPU will include its consumer protection plan as a key piece of program design to workshop with stakeholders during its program-specific and regional stakeholder engagement sessions. Additionally, the consumer protection plan will play an integral role in overseeing contracts and subawards with any project reporting requirements to the NJBPU. NJBPU will monitor contracts and subawards through periodic reporting and compliance checks to ensure adherence to consumer protection standards and responsible use of funds.

Section 4: Timeline and Milestones

NJBPU will implement NJSFA in several phases from September 2024 to September 2029.

January-April 2025

The initial phase, spanning January to April 2025, will focus on producing a NJSFA straw proposal for stakeholder engagement. During this time, NJBPU will work with a consultant to define eligibility criteria, develop initial evaluation criteria, and finalize the financial assistance strategy. For community solar expansion, NJBPU will leverage existing criteria for the program, such as requirements that community solar projects have a timely path to commercial operation. For the community solar equity pilot and Residential Solar competitive grant, criteria will be drafted for stakeholder input in later phases to ensure that they are fully aligned with community needs. Additionally, for the residential solar program and workforce development plan, MOUs will be drafted with both NJDOL and NJEDA, who will be responsible for administering portions of NJSFA award; MOUs will not be formally entered into until after the planning period.

Administrative planning will include the creation of a stakeholder management plan and the determination of operating models for each NJSFA pillar. NJBPU will simultaneously execute various key activities for each contractual program, such as finalizing the financial assistance strategy for the Community Solar Expansion (CSE) grant and determining LIDAC subscription percentages. Additionally, the scope of eligible grid upgrades will be defined for the enabling upgrades component.

April-September 2025

From April to September 2025, NJBPU will refine program designs based on stakeholder input and begin executing stakeholder management plans. For NJBPU's community solar programs, there will be 6 program-specific engagement sessions, as well as three geographic engagement sessions covering several clean energy programs to ensure New Jersey's regional and geographic

complexities are accounted for and incorporated into program design. The various stakeholder engagement sessions will address various topics and decisions, including:

- **Community solar:** refining consumer protection plan to address challenges unique to LIDAC communities, gathering perspectives from community solar developers on sustainable long-term O&M approaches, and aligning on eligibility criteria for municipalities and CBOs to participate in the equity pilot
- **Residential solar:** discussing the structure of the potential financial products (e.g., TPO-to-own and loan products) and determining criteria for selecting service providers
- **Technical assistance:** determining tools and resources that would be most beneficial to all stakeholders (e.g., developers, municipalities, LIDAC households, MFAH owners/operators), discussing potential for innovative for interconnection and siting processes, designing and establishing website featuring technical assistance resources, and refining potential approaches for common permitting software
- **Enabling upgrades:** consulting with utilities and developers to determine types of upgrades that will be eligible and prioritized, clarifying how to leverage existing grid modernization efforts to be complementary, and determining geographic prioritization in terms of highest LIDAC populations and grid challenges
- **Cross-cutting stakeholder engagement:** discussing how to streamline income verification processes and optimize for LIDAC accessibility, building best practices for marketing and outreach strategies, engaging CBOs to improve LIDAC participation, aligning on energy bill savings methodology, and discussing approach to implement Davis-Bacon and Build America, Buy America requirements

NJBPU will also refine evaluation criteria and technical considerations, such as income verification and auto-enrollment processes. The CSE grant will expand CSEP's consumer protection plan and define application scoring methodologies, while the Community Solar Equity Pilot will determine its application process. For enabling upgrades, NJBPU will develop guidelines to ensure funding enables incremental grid upgrades. A key cross-cutting milestone during this period is determining how existing income verification processes can be leveraged across all NJSFA programs.

September-December 2025

Between September and December 2025, NJBPU will continue to engage stakeholders to confirm final program details through program-specific and geographic engagement sessions, determine reporting and audit processes, and finalize marketing and outreach approaches. The CSE and Community Solar Equity Pilot programs will collect input from current community solar developers on potential O&M strategies. A crucial cross-cutting effort during this time will include the adoption of USEPA guidance on Davis-Bacon ("DBA") and Build-America, Buy-America requirements ("BABA") by potentially weaving them into the program evaluation criteria.

October and beyond

NJBPU will finalize the NJSFA and begin implementing parts of the program as early as October 2025 and continue until the end of the period of performance in August 2029. As it implements its NJSFA programs, NJBPU will include solicit grant applications, disburse funding, and administer audits. The CSE and Community Solar Equity Pilot programs will issue calls for applications, review and select projects, and conduct site visits. Enabling upgrades applications will launch and NJBPU will monitor the progress of upgrade projects. Various forms of technical assistance will launch

with enhanced tools and websites and NJBPU will implement innovative pilots. Throughout this phase, cross-cutting activities for all programs will include collecting and reviewing project metrics, implementing O&M support strategies, and submitting semi-annual performance reports to USEPA. At year 3, NJBPU will conduct a comprehensive and holistic program evaluation to determine whether reallocation of funds (e.g., from Innovation Fund to other workforce development programs) is necessary.

Section 5: Reporting Requirements

Metric tracking and reporting

NJBPU plans to adopt a robust reporting system to track key metrics, including climate and air pollution benefits, equity and community benefits, and market transformation benefits. The below list describes the key activities the NJBPU and relevant partner agencies will undertake during the planning period and throughout implementation to track metrics across relevant reporting requirements:

- Climate and air pollution benefits: NJBPU currently has systems in place to track metrics related to climate and air pollution, including number of projects financed and clean energy generation for community solar, and will extend these requirements to residential solar program. NJBPU will also adhere to USEPA guidance to calculate outcomes (e.g., how MW deployed translate to emissions avoided). To ensure these processes are operational, during the planning period, NJBPU will:
 - Review and enhance existing tracking systems for CSEP
 - Develop a standardized reporting template for residential solar developers
 - Ensure USEPA guidance on outcomes calculations is fully integrated into metric tracking and reporting processes

During implementation, NJBPU will:

- Regularly update tracking systems based on project data and USEPA guidance, ensuring NJBPU and other responsible agency staff are adequately trained in data management of these metrics
 - Conduct quarterly reviews and audits of developer reports and emissions calculations
- Equity and community benefits: NJBPU will require developers to report on households served and savings. NJBPU will also directly collect data on projects committing to local economic development impacts and prioritize these projects through scoring criteria for project applications. As part of workforce program, NJBPU and NJDOL will also require funding recipients to report on workers trained and jobs placed. To operationalize this data reporting and tracking approach, NJBPU will undertake the following actions during the planning period:
 - Design reporting guidance for developers to capture household and savings data
 - Collaborate with NJDOL and other key stakeholders to create a workforce reporting framework
- During implementation, NJBPU will:
- Conduct quarterly reviews and audits of developer reports on households served and savings

- Analyze and report on local economic development impacts of funded projects, to potentially be published on the public NJSFA website
- Work with NJDOL to compile and analyze workforce development metrics
- Market transformation benefits: NJBPU will measure and report on market transformation outcomes through a multi-pronged approach that includes budget reporting, CBO engagement, developer and utility reporting, and tracking of private capital deployment. To this end, NJBPU will manage a year-by-year budget to report on grant allocations by type and will maintain a CBO engagement plan as described in previous sections to report on engagement metrics. NJBPU will also require developers and utilities to report regularly on interconnection timelines and delays. To execute this approach, NJBPU will spend the planning period performing the following activities:
 - Develop a detailed budget tracking system for grant allocations
 - Establish a reporting mechanism for interconnection timelines with utilities and developers

During implementation, NJBPU will:

- Conduct monthly reviews of grant allocations
- Update the CBO engagement database after each engagement activity
- Analyze quarterly reports on interconnection timelines and address delays
- Collaborate with NJEDA to assess private capital deployment trends

NJBPU will require any developer, vendor, or other type of funding recipient from the Program to agree to data sharing and reporting requirements as a condition of receiving funding from the Program. During the one-year planning period, NJBPU will incorporate these requirements into all RFPs, relevant stakeholder engagement sessions, marketing materials, subaward and contract terms and conditions, and guidance on reporting requirements. Additionally, during the planning period, NJBPU will create a data management system to report USEPA program performance against the above metrics. This data collection will prioritize equity-based metrics (e.g., assessing MW deployed and project subscribership by geography, community income levels and demographic characteristics, community energy burden).

During implementation, NJBPU will conduct data analysis on a quarterly basis on the performance metrics listed above. Dedicated staff will be responsible for collecting, analyzing, publishing, and reporting program data to the USEPA.

Compiling and submitting performance reports

NJBPU and other agencies responsible for the disbursement of NJSFA funds will work closely throughout the implementation of NJSFA to compile semi-annual and final performance reports and submit them to the USEPA.

For its semi-annual reports—the first of which will be submitted in Q1 2025 and will cover the period between the first day of the period of performance and December 31, 2024—NJBPU will require all responsible parties, including NJEDA, NJDOL, developers, and others receiving or responsible for NJSFA funding to submit the above metrics (where applicable) no later than 30 days after the end of the reporting period for a given semi-annual report. It will then draft the

semi-annual report and convene responsible parties to review, provide feedback, and finalize the report prior to submission to USEPA.

Alongside the semi-annual report, NJBPU will also gather relevant transaction-level and project-level data from responsible parties and submit them electronically to the USEPA Project Officer within 30 calendar days after the semi-annual reporting period ends.

For its final report, which will cover the entire period of performance and be submitted no later than 120 calendar days after the end date of the period of performance, NJBPU will follow a similarly collaborative process as for semi-annual reports and work with responsible parties to create an overall assessment of NJBPU's implementation of its SFA award and detail its program strategy and plans for performance reporting. In drafting the final report, NJBPU will ask responsible parties to submit documents addressing the following elements as requested by USEPA:

- Progress towards objectives on key performance metrics over the entire period of performance,
- Summary of key activities completed in the entire period of performance, including case studies across different types of financial assistance and project-deployment technical assistance undertaken to enable low-income and disadvantaged communities to deploy or benefit from zero-emissions technologies,
- Geographic coverage of financial assistance and project-deployment technical assistance deployed in the entire period of performance,
- Descriptions and examples of actions the program took over the entire period of performance to meaningfully involve the communities the program serves in program design and operations,
- Plans for key activities (including current transaction pipeline) to be completed as well as outputs and outcomes to be achieved under the Closeout Agreement.

Section 6: Budget Narrative

6.1 Project Budget

Personnel: \$0

NJBPU will not use federal funding to hire or compensate personnel at the State to support NJSFA.

Fringe Benefits: \$0

N/A because there will not be spending for personnel.

Travel: \$5,000

NJBPU plans to send 5 staff members to 3 geographic engagement sessions within the State of New Jersey that are being scheduled and hosted during the planning period (discussed previously in the workplan). Using the IRS 2023 Standard Mileage Price of \$0.67 per mile, and that each staff

member is estimated to travel about 100 miles per event, this equates to \$1,005 for local staff travel expenses in program year 1. Using the GSA FY 2024 Per Diem Rates for New Jersey, NJBPU estimates \$0 for in-State lodging and about \$36 for dinner and incidental expenses per traveler, per event. This equates to about \$540 for staff travel expenses. Program Year one totals about \$2,000 for local travel, covering additional expenses for parking, tolls, and unforeseen costs. Over the remainder of the five-year funding period, staff will be locally traveling to allow for additional stakeholder engagement as well as visit and inspect projects funded by NJSFA. An additional 2,625 miles of travel is foreseen, approximately \$1,125 for parking and tolls, plus \$117 for unforeseen costs. In total, NJBPU is budgeting \$5,000 in travel expenses for the entire federal funding period for an estimate of 12 trips within New Jersey for five staff members.

Equipment: \$0

No equipment costs foreseen.

Supplies: \$8,000

NJBPU plans to allocate \$8,000 for supplies related to NJSFA marketing materials (e.g., small promotional items or souvenirs) and collateral (e.g., printed flyers). This budget allocation was sized based on NJBPU's experience with advertising its current solar programs and its current contract with the NJBPU's Clean Energy Program administrator. This budget will be spent over program years one and two to match stakeholder proceeding activities detailed in the "Others" line-item description in the attached budget and detailed below. Souvenirs/promotional items are necessary to provide NJSFA stakeholder meeting attendees a keepsake to remember the program and be a source of advertisement of the program outside of NJSFA funded events. The NJBPU estimates purchasing about 2,000 souvenirs at \$3 each, equaling \$6,000. Flyer printing materials will be purchased by the NJBPU with the remainder of the "Supplies" budget.

NJBPU will not purchase tangible personal property with its federal award.

Contractual: \$138,540,800

NJBPU is planning to integrate NJSFA into existing solar programs and use contractors for program development, implementation and control. NJBPU has allocated a consultancy procurement budget for program development, solicitation preparation, and program administration. In total, NJBPU is allocating \$6.45 million in total contractual Consultant Costs over the program duration.

The \$2 million budget for a Program Development Consultant is based on NJBPU's extensive experience with engaging expert help on the design of solar and general competitive procurement programs. Similarly, the \$3.45 million budget for a Competitive Solicitation Consultant to help run the NJSFA contractual programs is based on the State's experience with both offshore wind and community solar procurements. Lastly, the \$1 million budget for a Program Administration contract is expected to cover costs to extend the NJBPU's currently contracted Clean Energy Program administrator scope of work, or competitively solicit a new contractor to monitor the ongoing NJSFA program. This contract will be for the contract maintenance and oversight of

already awarded NJSFA contracts, and the continuation of necessary reporting to the State and USEPA.

NJBPU will utilize the State's own competitive procurement policy, as permitted by 2 CFR 200, to contract consultants using federal funding. The NJBPU understands that costs for consultant compensation charges to the USEPA assistance agreement must not exceed the consultant cap of Level IV of the Executive Schedule, currently set at \$191,900 for calendar year 2024. The need rate per hour and number of hours for the consultant will be competitively bid on using the appropriate State competitive procurement process and awarded based on the State's evaluation criteria for competitive solicitations.

NJBPU budgets \$85,700,240 for its Community Solar Expansion program as a portion of its overall Financial Assistance budget. The CSE program aims to expand New Jersey's existing Community Solar Energy Program to reach more geographically dispersed low-income or CEJST-identified disadvantaged households, and will incentivize additional community solar projects beyond the State's statutory mandate of at least 150 MW of new community solar generation per year from EY22 to EY27. These contracts are to be competitively awarded to solar developers by NJBPU directly. For community solar grants, NJBPU will make awards before projects are built, but plans to make the award payments after projects are built to avoid the risk of disbursing funds for projects that fail to be commissioned.

NJBPU budgets \$28,286,800 for its Community Solar Needing Enabling Upgrades program as a portion of its overall Financial Assistance budget. This program aims to support community solar projects requiring significant network upgrades and will partially offset distribution system upgrade requirements set forth by utilities, enabling community solar deployment in areas with limited grid capacity. These contracts are to be competitively awarded to solar developers by NJBPU directly. For community solar projects in places with limited grid capacity, grants will be made as early as possible to ensure that projects will be built and funding deployed within the allowable 5 years, since the timelines for upgrades can be lengthy.

NJBPU budgets \$18,103,760 for its Multi-family Affordable Housing Solar program as a portion of its overall Financial Assistance budget. This program aims to incentivize solar deployment for affordable housing, bridging the gap in net metering credits between commercial rates for master-metered buildings and residential rates. These contracts are to be competitively awarded to solar developers by NJBPU directly.

Other: \$17,566,200

NJBPU budgets a total of \$37,000 for community engagement venues, technology, and communication collateral. Based on prior in-person stakeholder events hosted by NJBPU, the estimated cost for venues is \$5,000 per day. \$25,000 is allocated for venue costs to allow the option to host five in-person events over the funding period. Based on prior hybrid in-person / virtual stakeholder events hosted by the NJBPU, the estimated cost for technology for livestreaming and audio-visual services is around \$2,400 per day. \$12,000 is allocated for technology costs to allow for the potential to host five events over the funding period.

NJBPU has agreed to set aside \$400,000 of its total federal award to be DOE in-kind technical assistance.

Participant Support Costs: \$0

No participating support costs are foreseen. In the case that participant support costs are necessary, information will be determined during the planning period and a new budget table and workplan will be submitted to the USEPA by the end of the planning period.

Subawards: 17,129,200

After completion of the one-year program planning period, the NJBPU plans to pursue two MOUs with partnering state agencies, the NJEDA and NJDOL, to carry out the subaward programs each respective agency has expertise in distributing funds for. These MOUs will follow abide by the federal pathway for Interagency Service Agreements.

The first MOU would be for the entire \$9,343,200 budgeted for the Residential Solar subaward program to the NJEDA at the end of the program planning year. This program will incentivize ownership of residential solar for CEJST-identified disadvantaged homeowners or geographically dispersed low-income households. As seen in the excel sheet labelled "NJEDA Budget Table (ISA)," the NJEDA anticipates it will be able to disburse the entire budget within the first two years of the performance period. Similarly to the Community Solar Expansion program, NJBPU and NJEDA will award residential solar projects ahead of installation but disburse funding after solar installation is completed.

The second MOU would be for \$5 million to the NJDOL at the end of the planning year to supplement NJDOL's existing workforce programs. These programs, detailed at length in Section 2 and on the separate excel sheet labelled "NJDOL Budget Table (ISA)", include funding for three existing workforce programs presently administered by NJDOL including approximately: \$3 million for GAINS, \$1 million for PACE, and \$1 million for OJT. NJBPU and NJDOL will collaborate on new award guidelines to align on solar workforce needs and reaching members of LIDACs. The NJDOL anticipates it will be able to subaward the federal funding within one year of entering into a MOU with the NJBPU for this work.

NJBPU budgets a total of \$2,786,000 for technical assistance and workforce development subgrants it will monitor and distribute that will serve the purposes outlined in the "Project-Deployment Technical Assistance Strategy" portion of Section 2. \$1 million of the budget will be for technical assistance measures to support the deployment of solar projects on both the developer and receiving customer sides. \$1,786,000 of the budget will be for the new Innovation Fund NJBPU will design during the planning period to fund initiatives that do not fit into existing workforce programs New Jersey already has for the solar industry.

Additional Items

Indirect Charges: \$0

No indirect costs foreseen.

Conferences and Workshops:

As previously indicated, NJBPU plans to allocate \$37,000 for events related to community and stakeholder engagement and general program education, with \$25,000 allocated for venue costs and \$12,000 allocated for technology costs. NJBPU will be initiating these events in partnership with NJDOL and NJEDA, with all three logos on meeting materials. NJBPU expects the distribution of attendees at these events to be 5% from federal government, 20% from state government, 25% from local government, and 50% from members of the public. NJBPU will largely be responsible for conducting these sessions, with design and administration input from NJEDA, NJDOL, other state agencies as needed, and other key stakeholders. NJBPU will not generate any program income from these informational sessions. NJBPU will be advertising all stakeholder engagement events on its NJSFA website and through its marketing campaign that will be established in the planning period. Information on stakeholder proceedings and records of stakeholder events will be disseminated to all local and state attendees on the NJSFA website.

Meals and Refreshments:

NJBPU anticipates that there will be three large in-person stakeholder engagement events in the first federal funding period; specifically, one event in the north, central, and south regions of New Jersey. As part of the \$25,000 allocated for venue costs, NJBPU will consider using a portion of the budget for light refreshments at each of the three in-person events at approximately \$800 per event for open table snacks and refillable drinks. NJBPU anticipates these events will be a full-day events and sees it as a reasonable expense to provide light refreshments for all attendees while they learn about NJSFA and other NJBPU clean energy initiatives serving the same demographic of beneficiaries. Serving light refreshments at the events may be necessary to ensure that participants remain at event during breaks and interact with each other in order to facilitate effective and efficient execution of the agenda.

NJBPU acknowledges that costs for these light refreshments will not be for prohibited expenses (i.e. day-to-day activities or alcohol).

Program Income:

No program income foreseen.

Other:

NJBPU will not develop copyrighted software or written material.

NJBPU does not anticipate an invention result from its NJSFA program.

NJSFA does not involve animal subjects.

NJSFA will not involve collecting identical information from 10 or more people.

NJSFA will not include any work outside of the US.

NJSFA will involve geospatial information that includes identifying geographic location and application/tools associated with such information. As part of its technical assistance budget, the NJSFA has plans to create a mapping tool to help solar developers and New Jersey residents identify areas of constrained grid capacity and geographic areas that are identified as LIDACs within the State.