



June 6th, 2025

New Jersey Board of Public Utilities
44 S. Clinton Ave
Trenton, NJ 08625

RE: Docket No. Q025040206 - IN THE MATTER OF THE CLEAN ENERGY PROGRAMS AND BUDGET FOR THE FISCAL YEAR 2026

Dear President Guhl-Sadovy, Commissioners, and Staff:

Thank you for the opportunity to provide comments on the proposed FY2026 Clean Energy Program (CEP) Budget to the NJBPU.

Isles, Inc. is a Trenton-based community development and environmental nonprofit organization with over 40 years of experience delivering practical, place-based solutions to improve public health, energy affordability, and environmental justice outcomes in New Jersey's overburdened communities. We commend the NJBPU for its continued investments in equitable clean energy, climate resilience, and affordability.

Below are our comments on the FY26 CEP Budget:

Whole House Pilot Program

Isles strongly urges the NJBPU to formalize and fund a Whole House Pilot Program line item that integrates energy efficiency, weatherization, lead remediation, health and safety interventions, and electrification upgrades. The current budget proposal does not include a specific line item for the Whole House Pilot Program; we urge the BPU to reconsider this allocation and look at the success of programs like it throughout the country, such as the Home Uplift program implemented in Tennessee, Alabama, Mississippi, and Kentucky. This program creates jobs, meets community members where they are, and builds relationships throughout the community. We recommend:

- Providing flexible funding through Comfort Partners or Community Energy Grants to allow for holistic interventions
- Partnering with community-based implementers like Isles to develop a model for statewide scaling

Isles is uniquely positioned to implement these models because of our trusted relationships, cross-sector experience, and real-time, on-the-ground infrastructure efforts. Supporting this approach



will ensure equity in energy savings and deliver long-term value to residents in low-and-middle income communities.

UHI Mitigation Grants

We are excited to see that the BPU has dedicated \$10 million towards Urban Heat Island (UHI) mitigation funding. Overburdened communities such as Trenton face disproportionate health and environmental impacts from UHI. BPU's dedicated allocation to UHI Mitigation is critical for programs that aim to reduce extreme heat risk through strategic tree planting, green infrastructure, and other science-based solutions, especially in vulnerable urban areas with limited canopy and aging housing stock. For instance, Isles's Trees for Trenton initiative, which aims to plant 1,000 trees over three years, is a critical small-scale project that helps mitigate UHI impacts.

In tandem with the proposed \$10 million allocation for UHI Mitigation grants, we encourage the BPU to:

- Prioritize funding for community-based organizations with a history of environmental health work in overburdened communities
- Ensure investments also support local workforce development and long-term tree maintenance capacity

Comfort Partners and Energy Bill Assistance

We applaud the proposed \$250 million in Clean Energy Affordability programs, especially \$125 million for Energy Bill Assistance and 62.9 million for Comfort Partners. These programs, along with the solar energy and battery storage projects that have been prioritized, will lead to local job creation and reliability for those who run the risk of facing unreliable power supply. We see firsthand that without targeted investment and streamlined access to support, some households are forced to choose between utilities, food, and rent. This is a win for all constituents—affordability affects everyone.

Grid Modernization Efforts

We support the proposed \$15 million for grid modernization efforts for FY26. However, we urge the BPU to add new funding for these efforts as well. Grid modernization issues underly the greater energy crisis currently facing New Jersey. The current grid's infrastructure and management processes must be modernized to meet our increasing electricity demands and support the shift away from fossil fuels. This need to modernize is only accelerating as data centers in the state call for the need to use more energy, but efforts must be approached with an equity focus. We recommend:

- Projects include community-based microgrids, especially in areas prone to outages and climate impacts



- Considering the impact of data centers on the grid
- Ensuring that funding supports storage co-location with distributed renewable energy
- Planning processes include equity-centered stakeholder engagement with community-based organizations and municipalities

Clean Fleets

We support the BPU's dedication to clean and equitable transportation in New Jersey, and are excited to see over \$3.7 million in new funding allocated to clean fleets. As a community-based organization with a long-standing commitment to environmental health, Isles urges the BPU to:

- Ensure dedicated outreach and technical support for community organizations, school districts, and municipalities in overburdened communities that may lack capacity for procurement, grant applications, and vehicle transition planning.
- Bundle Clean Fleets incentives with e-mobility and energy infrastructure programs to allow coordinated charging infrastructure

Clean fleets are not only a transportation investment; they are a public health and workforce investment.

E-Mobility Programs

While we are encouraged to see the proposed \$1 million allocation for E-Mobility, we respectfully request that the NJBPU increase funding to \$5 million to support implementation and growth of successful pilot projects. We want to prioritize existing pilots like our *GOTrenton!* service—a fully electric, community-based microtransit rideshare service primarily serving low-income Trenton residents and making transportation more accessible for everyone.

Isles recognizes the importance of program continuity and sustainability, particularly for trusted services just beginning to gain traction in EJ communities. Programs like this have invested years in community engagement, design, and early implementation. Funding existing pilot programs such as *GOTrenton!* will allow these projects to serve as models for future transportation programs during their development. This continued support will generate a better return of investment for the state by promoting direct economic and social growth within the communities we serve as well as providing technical assistance to developing programs. *GOTrenton!* is currently working with several NJ communities to provide insights on how to promote equitable transportation and create new clean energy jobs within their own towns, cities, and boroughs in other parts of the state.

Electric School Buses

We are excited to see \$15 million in new funding for Electric School Buses (ESB) programs in FY26, and encourage additional investment in education and outreach for school districts and organizations transporting students with their fleet transition process. In addition to the



environmental benefits of zero tailpipe emissions, ESBs also provide significant positive public health outcomes for students and their communities by reducing exposure to diesel exhaust pollution.

Workforce Development

Isles is concerned to see that clean job training programs are no longer a line item in the proposed FY26 budget, a major shift from the previous budget which allocated \$22 million. We recognize that job training programs and opportunities in the clean energy space are a major driving force behind support for clean energy in the state. At a time like this when energy costs are rising and our energy grid grows more and more strained from increased demand, it is critical to support workforce development and job training efforts in the renewable energy sector. Investing in our workforce to ensure they are ready to implement clean energy technologies is key to meeting New Jersey's clean energy goals, meeting increasing demand and securing a clean, healthy future.

Conclusion

We are grateful to the BPU for the opportunity to provide comments on the proposed FY26 NJCEP budget. As we transition to more sustainable and energy efficient practices, New Jersey communities will see tangible benefits, from lower energy costs to healthier homes and environments. By approaching NJ's clean energy goals with an inclusive, equity-minded, efficient approach, we can revitalize neighborhoods, build wealth, and promote healthy living.

Respectfully,

Sean Jackson

CEO

Isles, Inc.