

EPA's Solar for All Funding Opportunity Informational Webinar

September 29, 2023

Presentation Overview

- Overview of the Solar for All Funding Opportunity
 - Award Information
 - Program Overview
 - Program Design Requirements & Considerations
 - Local Project Implementation Teams
- Overview of Tennessee's Solar for All Application
 - Stakeholders & Roles
 - Types of Solar Infrastructure Pursued
 - Financial Assistance Models
 - Project Deployment Strategies & Partnership Opportunities
 - Application / Proposal Development Status Update
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Federal Award Information

- EPA anticipates awarding approximately \$7,000,000,000 under this announcement.
- Award option #1 up to 56 awards to serve state and territory geographies
- Cost sharing is not a requirement for states to be eligible to apply to this solicitation.
- Application packages must be submitted on or before October 12, 2023, at 11:59 PM (Eastern Time) through Grants.gov.



Solar for All Scope

- The Solar for All competition will fund applicants applying to expand existing or **develop new Solar for All programs**.
- A Solar for All program is a program that ensures low-income households have access to residential rooftop and residential-serving community solar energy, often through providing financial support and other incentives.
- Solar programs can extend beyond solar generating capacity to include associated storage and enabling upgrades that allow for the deployment of solar energy in low-income and disadvantaged communities.
- Programs may also include solar project-deployment technical assistance such as workforce training programs that enable underserved communities to participate in the economic opportunity created by the energy transition.



Funding Thresholds

- At least **75% of program funds** must go towards **eligible financial assistance**.
 - If requesting the maximum \$250M allowed, this would mean at least \$187,500,000 goes towards financial assistance for solar projects – residential rooftop or community solar installations, required enabling upgrades, and associated storage.
- Of the 75% set aside for eligible financial assistance, no more than 20% can support enabling upgrades.
 - If requesting the maximum \$250M allowed, this would mean \$37,500,000 could support enabling upgrades required for the installation of solar infrastructure.
- The remaining 25% of program funds can assist with administration costs, project-deployment technical assistance, and workforce development.
 - If requesting the maximum \$250M allowed, this would mean \$62,500,000 could support the activities named above.



Meaningful Benefits

- **Household Savings:** Deliver a minimum of 20% electricity bill savings to all households served under the program.
- Equitable Access to Solar: Ensure the program increases access to solar generation for low-income and disadvantaged communities.
- **Resilience Benefits:** Create capacity to deliver power to low-income and disadvantaged communities and households during a grid outage.
- Community Ownership: Facilitate ownership models that allow for low-income and disadvantaged communities and households to own assets.
- Workforce Development & Entrepreneurship: Invest in high-quality jobs and businesses in low-income and disadvantaged communities.



Residential Rooftop & Residential-Serving Community Solar Definitions

- **Residential Rooftop**: Behind-the-meter solar photovoltaic (PV) power-producing facilities, including rooftop, pole-mounted, and ground-mounted PV systems, that support individual households in existing and new single-family homes, manufactured homes, and multifamily buildings. The definition of residential rooftop solar includes behind-the-meter solar facilities serving multifamily buildings classified as commercial buildings so long as the solar facility benefits individual households either directly or indirectly such as through tenant benefit agreements. Residential rooftop solar includes properties that are both rented and owned.
- **Residential-Serving Community Solar**: A solar PV power-producing facility or solar energy purchasing program from a power-producing facility, with up to 5 MW nameplate capacity, that delivers at least 50% of the power generated from the system to multiple residential customers within the same utility territory as the facility. There are a variety of community solar ownership models that can be considered, including community-owned solar, third-party-owned community solar, and utility-owned community solar.



Program Design Requirements & Considerations

- Award Option #1 applicants should use at least 75% of the award for financial assistance to solar projects.
 - **Eligible financial assistance**: subsidies, grants, rebates, forgivable loans, and recyclable financial products such as loans (including soft loans and subordinate loans).
- EPA anticipates the start date for programs funded under this funding opportunity will be July 2024. All activities funded with the initial grant award must be completed within the negotiated program performance period of up to five years.
- Applicants may elect to include a program planning period in their application that should not exceed one year. This planning period will provide time to refine program plans after receiving an award from EPA and before beginning to deploy financial and technical assistance.



Program Design Requirements & Considerations

	Small Programs	Medium Programs	Large Programs
Award range	\$25 million up to \$100	Greater than \$100	Greater than \$250
	million	million and up to \$250	million and up to \$400
		million	million
Approximate	Up to 10,000 households	Greater than 10,000	Greater than 30,000
number of		households and up to	households
households		30,000 households	
served			



Local Project Implementation Teams

- With the exception of "coalition applications," EPA does not require nor encourage applicants to name subrecipients in applications for grant funding. For this competition, the EPA requires any named subrecipient to be part of a coalition application as a non-lead coalition member, which must be eligible for a subaward in compliance with Appendix A of EPA's Subaward Policy.
- Coalition applications must include a signed Memorandum of Agreement (MOA) that confirms participation of each coalition member in their application.
- Due to time limitations, TDEC will not name subrecipients, and instead will highlight "Local Project Implementation Teams" and "Lead Entities" known at the time of application.



Stakeholders & Roles

- The Program Development Team is comprised of the Tennessee Department of Environment and Conservation Office of Energy Programs (TDEC OEP), TVA's EnergyRight – Residential Team, TVA's Federal Funding Project Management Office, and TVA's Renewable Programs Team.
- Local Governments and LPCs in Chattanooga, Clarksville, Knoxville, Memphis, and Nashville, plus Middle Tennessee Electric (MTE) have already been identified as Local Project Implementation Teams. More teams may be identified during the one-year planning period.
- Solar for All will balance the State's overall interests while also simultaneously empowering Local Project Implementation Teams to tailor their programming, maximizing the impact of this program throughout Tennessee's communities.
- Solar for All will **leverage TVA's existing programs**, such as the Flexibility Program and the Dispersed Power Program, and LPCs' utilization of the Flexibility Program.



Types of Solar Infrastructure Pursued

- Residential Rooftop Solar:
 - Single-Family Housing
 - Multifamily Housing:
 - Public Housing
 - Privately-Owned Affordable Housing
- Residential-Serving Community Solar

Financial Assistance Models

- Financial Assistance will serve both a Statewide Program and communitybased Local Project Implementation Teams across the state.
- Grants will be issued to support solar infrastructure, storage, and "enabling upgrades." We are also exploring other financial models to support the sustainability of this program (e.g., escrow for ongoing O&M) and maximize use of EPA's funding.
- Financial Assistance Options will be confirmed during the one-year planning period.



Project Deployment Strategies & Partnership Opportunities

- TDEC has been and will continue to engage community and nonprofit organizations within the to ensure the success of solar deployment in Tennessee.
 - Community-based workforce development & training nonprofits, such as:
 - GreenSpaces (Chattanooga)
 - Be a Helping Hand (Nashville)
 - SEEED (Knoxville)
 - Goodwill Industries of Middle Tennessee (Middle & West Tennessee)
- Tennessee Board of Regents (TBR) & Tennessee Colleges of Applied Technology (TCATs)
- We are still looking for additional partners!
- Solar for All may financially assist Local Project Implementation Teams in **training and certifying** their staff through programs such as:
 - Department of Commerce and Insurance solar training courses.
 - North American Board of Certified Energy Practitioners (NABCEP) courses and certifications.



Project Status Update

 Ongoing meetings with non-profits and industry partners, especially those with solar workforce development opportunities.

• Data Collection Progress:

• A few requests are outstanding and are critical to completion of the proposal, and TDEC will continue to seek that information.

• Status of Application/Proposal:

- First drafts of the Program Strategy Narrative and Programmatic Capability/Environmental Results documents are currently in review
- All documents will be ready by Friday, October 6, for final TDEC review and approvals prior to the application deadline of Thursday, October 12.



Definition of Number of Low-Income Households Served

- There are 2,720,295 Tennesseans living in a Disadvantaged Community (DAC) per the CEJST.
 - Tennessee can request between \$25 \$100M (Small Program) or \$100 -\$250M (Medium Program).
- 751,291 low-income households have been identified across 58 unique counties and municipalities.
 - This is based on EJScreen Data, those receiving SNAP benefits, 80% Area Median Income, and 200% Federal Poverty Level – we will also assess the number of properties providing affordable housing.



Additional Engagement Opportunities

- TDEC is seeking the following:
 - Nonprofits/community-based organizations that can help with engagement of diverse and/or disadvantaged communities (Non-English speaking, rural, low-income, etc.).
 - Nonprofits/community-based organizations that have programs to support solar workforce development opportunities.
 - Schools interested in **solar deployment training courses and apprenticeship programs**.
 - Local housing authorities and organizations that would like to participate in a rooftop residential solar program.
 - Nonprofits/community-based organizations or other institutions that can help evaluate potential financial assistance models, particularly for low-income households.



Next Steps

- Letters of Support **Due Thursday, October 5**
- If you would like to provide a Letter of Support, please contact:

Nola Hastings, Grants Program Director TDEC Office of Energy Programs <u>nola.hastings@tn.gov</u>





- EPA's Website
- <u>Notice of Funding Opportunity (NOFO)</u>
- NOFO Webinar





APPENDIX A Definitions & Terminology

Last Updated: September 5, 2023

Associated Storage

- Infrastructure to store solar-generated power for the purposes of maximizing residential rooftop and residential-serving community solar deployment, delivering demand response needs, aggregating assets into virtual power plants, and delivering residential power during grid outages.
- Financial assistance for associated storage must be deployed in conjunction with financial assistance for a solar PV system and the storage asset must be connected to the solar PV system.



Capital Mobilization

- For this competition, capital mobilization refers to additional capital contributions made toward qualified projects as a result of the grant's activities. Applicants may define methodologies to set goals and targets for capital mobilization for the purposes of their applications. An example methodology is provided below; applicants that do not use this methodology will not be penalized.
 - Capital mobilization is defined as the total capital contributions toward projects that are financed by the grantee, excluding grant funds; under this definition, capital mobilization for a particular project may be calculated as total capital contributions toward the project, less grant funds committed to the project by the grantee. Total capital contributions may include financing provided by the grantee with funds raised from private capital providers (including through balance-sheet leverage and securitizations), additional sources of financing provided to project sponsors from private capital providers, equity contributions from project sponsors, and sources of public capital including tax increment financing and other tax incentives. Private capital mobilization is defined as a subset of capital mobilization, excluding capital contributions from public entities, including federal, state, and local government entities (such as tax credits and other financial incentives) other than grant funds provided under this competition.
 - For this competition, the capital mobilization ratio is defined as the grantee's capital mobilization (as defined above), divided by the grantee's capital commitments through financial assistance (i.e., total financial contributions to the project). The private capital mobilization ratio is defined as the grantee's private capital mobilization (as defined above), divided by the grantee's capital commitments through financial assistance. These ratios exclude the grantee's expenditures for project-deployment technical assistance and program administration activities.



Coalition Application

- A coalition application is one of the two types of eligible applications under this competition. A coalition application is composed of one lead applicant, which partners with one or more non-lead coalition member(s) that are named in the application and would receive subawards (in the form of subgrants) to carry out a portion of the grant's activities if the application is selected. The lead applicant must be an eligible applicant and submit the application on behalf of the coalition. The non-lead coalition member(s) may be eligible applicants as defined in Section 134(c)(1) as well as other types of nonprofits, governmental entities, and Institutions of Higher Education9 that are entities eligible for subawards under the EPA Subaward Policy.10 An application submitted by a coalition should describe the overall coalition's program plan, including the role of each coalition member in the Program Narrative.
 - If selected, the lead applicant will become the grantee, administer the grant as a pass-through entity for the purposes of 2 CRF Part 200, and be accountable to EPA for effectively carrying out the full scope of work and the proper financial management of the grant (including subawards to non-lead coalition members). Additionally, if selected, as provided in 2 CFR § 200.332, non-lead coalition members will become subrecipients accountable to the lead applicant for proper use of EPA funding. Applicants do not need to identify all subgrantees at the time of application (only coalition members must be named), yet applicants should identify in the budget narrative and the Budget Table the intent to award subawards even if the subgrantee is not identified. Note that pursuant to 2 CFR § 200.332(a)(2), as implemented in Items 2 and 4 of EPA's Establishing and Managing Subawards General Term and Conditions, successful lead applicants of coalitions must ensure that the terms and conditions of the grant agreement "flow down" to any coalition members as well as other eligible subrecipients that are provided subawards.



Cooperative Agreement

- Cooperative agreements provide for substantial involvement between the EPA Project Officer and the selected applicant(s) in the performance of the work supported. Although EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process (program specific forms of substantial involvement by employees of EPA and other Federal agencies (e.g., DOE) are likely), generally substantial federal involvement for these projects may include any or all the below activities.
 - Closely monitoring the successful applicant's performance to verify the results proposed by the applicant
 - Collaborating during performance of the scope of work
 - Reviewing proposed procurement, in accordance with 2 CFR ¬ß 200.317 and 2 CFR ¬ß 200.318
 - Approving qualifications of key personnel (EPA will not select employees or contractors employed by the award recipient)
 - Approving completion of project phases before the recipient can draw down funding for subsequent project phases
 - Reviewing and commenting on reports prepared under the cooperative agreement (the final decision on the content of reports rests with the recipient)
- EPA does not have the authority to select employees or contractors employed by the recipient. The final
 decision on the content of reports rests with the recipient.



Eligible Zero-Emissions Technology

- Section 134(a)(1) of the Clean Air Act provides that grants be used to provide financial assistance and technical assistance "to enable low-income and disadvantaged communities to deploy or benefit from zero-emissions technologies." Section 134(c)(4) of the Clean Air Act provides that the term zero-emissions technology means any technology that produces zero emissions of (a) any air pollutant that is listed in Section 108(a) (or any precursor to such an air pollutant) and (b) any greenhouse gas. EPA is implementing this statutory language by identifying the four technology categories that exclusively qualify for financial and technical assistance from Section 134(a)(1). These technology categories are defined below. Note: "distributed solar" is used to refer to residential rooftop and residential-serving community solar throughout this NOFO.
 - Any technology that produces zero emissions of (a) any air pollutant that is listed in Section 108(a) (or any precursor to such an air pollutant) and (b) any greenhouse gas.



Enabling Upgrades

- Investments in energy and building infrastructure that are necessary to deploy and/or maximize the benefits of a residential rooftop and residential-serving community solar project.
- Enabling upgrades can include, but are not limited to, electrical system upgrades, structural building repairs and energy efficiency.
- Applicants may decide the exact types of enabling upgrades that are eligible for Solar for All financial assistance, yet all enabling upgrades should be energy and building infrastructure related and deployed in conjunction with financial assistance for an eligible solar PV system.
- Financial assistance for enabling upgrades may comprise up to 20% of the total financial assistance deployed during the lifetime of the program.



Equitable Access

• Equitable access means all communities, especially historically underserved households and communities, can benefit from this program.



Financial Assistance

- Financial assistance is defined as subgrants, rebates, subsidies, other incentive payments, debt (including loans, partially forgivable loans, forgivable loans, soft loans, subordinate debt), and other financial products consistent with the definition of Federal financial assistance in 2 CFR § 200.1 and Participant support costs in 2 CFR § 1500.1.11 Solar for All financial assistance is intended to enable low-income and disadvantaged communities to deploy and benefit from solar, storage, and enabling upgrades, while ensuring all projects deliver household savings, among other benefits. Most applicants should use at least 75% of program funds on financial assistance and should maximize solar deployment funded by this program. EPA will evaluate proposals more favorably if the applicant proposes to use 75% of program funds or more on financial assistance. Please see Section I.E: Scope of Work for additional guidance and details on applicability.
 - All financial assistance must enable low-income and disadvantaged communities to deploy and benefit from residential-rooftop and residential-serving community solar capacity, associated storage, and enabling upgrades
 - Costs for eligible financial assistance, as defined in Section I.D: Competition Terminology as subgrants, rebates, subsidies, other incentive payments, or loans, consistent with the definition of "federal financial assistance" in 2 CFR § 200.1



Geographically Dispersed Low-Income Households

- GGRF's definition of "geographically dispersed low-income households" includes low-income individuals and households that fall within either of the two categories listed below.
 - Individuals and households with incomes at or below the greater of:
 - For Metropolitan Areas: (1) 80% Area Median Income (AMI) and (2) 200% of the Federal Poverty Level
 - For Non-Metropolitan Areas: (1) 80% AMI; (2) 80% Statewide Non-Metropolitan Area AMI; and (3) 200% of the Federal Poverty Level
 - Individuals and households currently approved for assistance from or participation in at least one of the following income-based or income-verified federal assistance programs, with an award letter within the last 12 months: (1) U.S. Department of Health and Human Services' (HHS) Low Income Home Energy Assistance Program; (2) U.S. Department of Agriculture's (USDA) Supplemental Nutrition Assistance Program; (3) U.S. Department of Energy's (DOE) Weatherization Assistance Program; (4) Federal Communications Commission's Lifeline Support for Affordable Communications; (5) USDA's National School Lunch Program; (6) U.S. Social Security Administration's Supplemental Security Income; or (7) any other verified government or non-profit program serving Asset Limited, Income Constrained, Employed (ALICE) individuals or households designated by the EPA Administrator



Life of the Assistance Agreement

• Life of the Assistance Agreement covers each competitive segment of the project.



Low-Income and Disadvantaged Communities

- Section 134(a)(1) of the Clean Air Act appropriates \$7 billion for the purposes of providing financial and technical assistance to enable "low-income and disadvantaged communities" to deploy and benefit from residential distributed solar. GGRF defines low-income and disadvantaged communities as encompassing the following four categories, as defined below: (a) communities identified as disadvantaged by the CEJST mapping tool; (b) a limited number of additional communities identified as disadvantaged low-income households; and (d) properties providing affordable housing.
 - CEJST-Identified Disadvantaged Communities: The Climate and Economic Justice Screening Tool (CEJST) is a publicly-available mapping tool developed by the White House Council on Environmental Quality. GGRF's definition of "disadvantaged communities" includes all communities identified as disadvantaged through the CEJST.
 - EJScreen-Identified Disadvantaged Communities: EJScreen is a publicly-available, place-based environmental justice screening and mapping tool developed by the EPA. GGRF's definition of "disadvantaged communities" includes (1) the limited supplemental set of census block groups that are at or above the 90th percentile for any of EJScreen's supplemental indexes14 when compared to the nation or state or (2) geographic areas within Tribal lands as included in EJScreen.



Market Barriers (Distributed Solar Market Strategy)

• Examples of market barriers include net metering policies, third party ownership policies, and opaque interconnection processes.



Meaningful Benefits (Rooftop and Community Solar)

- Consistent with Section 134(a)(1), this program must "enable low-income and disadvantaged communities to deploy or benefit" from solar. This program defines "benefit" as the five meaningful benefits of residential rooftop and residential-serving community solar defined below. EPA will evaluate applications on their vision and ability to maximize the following benefits received by low-income and disadvantaged communities.
 - Household Savings: Delivering a minimum of 20% household savings to all households served under the program, including households in multi-family, master-metered buildings; 20% household savings is defined as 20% of the average household electricity bill in the utility territory. Household savings can be delivered as a direct financial benefit or, for households without an individual utility bill, a direct non-financial benefit equivalent in value to the program's household savings target in the utility territory. Additional detail on how to calculate household savings is included in *Appendix C: Household Savings Guidance*. Applicants may propose preliminary estimates in the financial assistance model for household savings and explain how they plan on refining those estimates during the first year of the program if more analysis is needed. EPA expects to work with grantees to refine estimates for household savings
 - Equitable Access to Solar: Ensuring the program increases access to residential distributed solar generation in low-income and disadvantaged communities through financing products and project-deployment technical assistance, maximizing the breadth and diversity of the households that can benefit from solar
 - Resilience Benefits: Increasing the resilience of the power grid by creating capacity that can deliver power to low-income and disadvantaged households and/or to critical facilities serving low-income and disadvantaged households during a grid outage
 - Community Ownership: Facilitating ownership models that allow for low-income households and disadvantaged communities to access the additional economic benefits of asset ownership
 - Workforce Development and Entrepreneurship: Investing in high-quality jobs and businesses in low-income and disadvantaged communities by supporting prevailing wages, investing in effective workforce training programs for underserved populations (e.g., pre-apprenticeship and registered apprenticeship programs), and prioritizing equitable economic opportunities for women and minority-owned businesses and contractors



Meaningful Benefits (Solar storage)

- The meaningful benefits of solar with storage include:
 - Delivering a minimum 20% of household savings to program beneficiaries;
 - Increasing low-income and disadvantaged households' access to solar through financing products and deployment options;
 - Increasing resiliency and grid benefits by creating capacity that can deliver power to low-income and disadvantaged households and/or critical facilities serving low-income and disadvantaged households during a grid outage;
 - Facilitating ownership models that support low-income households and communities building equity in projects;
 - Investing in quality jobs and businesses in line with the Administration's Good Jobs Principles and Executive Order 14082 (Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022).



Multi-Family Housing

- THDA's Weatherization Assistance Program's definition is "housing with five or more units."
- WAP Details: <u>https://thda.org/help-for-homeowners/energy-assistance-programs/weatherization-assistance-program</u>



Outcomes

- The term "outcome" means the result, effect, or consequence that will occur from carrying out an environmental program or activity that relates to an environmental or programmatic goal or objective.
- Outcomes may be environmental, behavioral, health-related, or programmatic in nature; may be quantitative or qualitative; and may not necessarily be achievable within the period of performance.



Outputs

- The term "output" means an environmental activity, effort, and/or associated work product related to an environmental goal or objective that will be produced or provided over a period or by a specified date.
- Outputs may be quantitative or qualitative but must be measurable during the period of performance.



Period of Performance

- EPA anticipates the start date for programs funded under this funding opportunity will be July 2024.
- All activities funded with the initial grant award must be completed within the negotiated program performance period of up to five years, meaning all program grant funds must be deployed as described in the application.
- In addition, if program income is generated from the program, grantees will be required to retain and reuse program income for additional capital deployment.



Planning Period

- Applicants may elect to include a program planning period in their application that should not exceed one year.
- This planning period can give the grantee time to refine program plans after receiving an award from EPA and before beginning to deploy financial and technical assistance.
- Using time and grant funds for program planning should help applicants create a strong foundation for a low-income solar program that is sustainable and long-lasting and fundamentally reshapes local solar markets to better serve low-income and disadvantaged communities.



Program Administration Activities

- Consistent with 2 CFR § 200.403, expenditures such as program administration costs are allowable under federal awards provided they are necessary and reasonable for the performance of the award-in this program, for the provision of financial assistance and project-deployment technical assistance. Expenditures for program administration activities could include those for program performance, financial and administrative reporting, and compliance, including but not limited to activities to support, monitor, oversee, and audit subrecipients, contractors, and program beneficiaries. Program administration costs include procuring services and tools that support the grantee in program design (e.g., technical assistance from the DOE National Laboratories to support the grantee directly for program design).
 - Costs for staff salaries, technology, and other office supplies, as either direct or indirect costs, in accordance with 2 CFR § 200 Subpart E and the applicant's Federally-approved indirect cost rate under 2 CFR § 200.414; note that costs must be consistently characterized as either direct or indirect as provided in 2 CFR § 200.412
 - Costs for advisory councils to meet the GGRF program objectives. Advisory councils are groups of individuals who
 are not employees of the grantee or a subgrantee that provide strategic and policy advice to the organization; refer
 to Item 2 of EPA's Selected Items of Cost Guidance for additional information on the allowability of costs for
 Advisory councils
 - Costs for reporting and compliance, including those to support, monitor, oversee, and audit subrecipients, contractors, and program beneficiaries
 - Costs for program evaluation activities including the personnel and equipment needed for data infrastructure and expertise in data analysis, performance, and evaluation
 - Indirect costs to the extent authorized by applicable provisions of 2 CFR § 200.414 and EPA's Indirect Cost Policy
 - All costs must meet the requirements for allowability under 2 CFR Part 200, Subpart E as well as applicable provisions of 2 CFR Part 1500.



Project-Deployment Technical Assistance

- Section 134(a)(1) of the Clean Air Act provides that funds for this competition be used for "technical assistance." Technical assistance is defined as "project-deployment technical assistance" and is services and tools provided by grantees to communities and energy stakeholders to overcome non-financial barriers to solar deployment. Examples of these services and tools include workforce training, customer outreach and education, project deployment assistance such as siting, permitting, and interconnection support (including procurement of services and tools from National Labs), and coordination with utilities for the purposes of project deployment.
 - Eligible project-deployment technical assistance includes community engagement strategies, including education, outreach, and dissemination of information to the public; customer acquisition support; management and verification requirements; cross-program coordination specific to project deployment (e.g., engaging with DOE's WAP); workforce training; and other wrap-around program support elements.
 - Eligible technical assistance examples include workforce training, customer outreach and education, project development & deployment assistance (including services and tools from National Labs), and coordination with utilities for the purposes of project deployment
 - Project-deployment technical assistance services should include investments in workforce development, project deployment



Program Income

- Consistent with 2 CFR § 200.1, program income means gross income earned by the grantee that is directly generated by a supported activity or earned as a result of the grant award.
- For this competition, program income includes but is not limited to origination fees, interest payments, income from principal and interest payments on loans made with federal award funds (e.g., repayments from revolving loan funds), interest from short-term securities (e.g., cash deposits of program income), asset sales, and other sources of program income (e.g., proceeds from bonds issued by governmental entities that were financed with EPA grant funds).
- EPA-specific rules on program income are provided at 2 CFR § 1500.8.



Properties Providing Affordable Housing

- GGRF's definition of "properties providing affordable housing" includes properties serving low-income individuals and households defined as properties that fall within either of the two categories listed below.
 - Multifamily housing with rents not exceeding 30% of 80% AMI for at least half of residential units and with an active affordability covenant from one of the following federal or state housing assistance programs: (1) Low-Income Housing Tax Credit; (2) a housing assistance program administered by the U.S. Department of Housing and Urban Development (HUD), including Public Housing, Section 8 Project-Based Rental Assistance, Section 202 Housing for the Elderly, Section 811 Housing for Disabled, Housing Trust Fund, Home Investment Partnership Program Affordable Rental and Homeowner Units, Permanent Supportive Housing, and other programs focused on the
 - goal of ending homelessness funded under HUD's Continuum of Care Program; (3) a housing assistance program administered by USDA under Title V of the Housing Act of 1949, including under Sections 514 and 515; (4) a housing assistance program administered by a tribally-designated housing entity, as defined in Section 4(21) of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. § 4103(22); or (5) any other housing assistance program designated by the EPA Administrator
 - Naturally-occurring (unsubsidized) affordable housing with rents not exceeding 30% of 80% AMI for at least half of residential units



Residential Rooftop Solar

- Behind-the-meter solar photovoltaic (PV) power-producing facilities, including rooftop, pole-mounted, and ground-mounted PV systems, that support individual households in existing and new single-family homes, manufactured homes, and multifamily buildings.
- The definition of residential rooftop solar includes behind-the-meter solar facilities serving multifamily buildings classified as commercial buildings so long as the solar facility benefits individual households either directly or indirectly such as through tenant benefit agreements.
- Residential rooftop solar includes properties that are both rented and owned.



Residential-Serving Community Solar

- A solar PV power-producing facility or solar energy purchasing program from a power-producing facility, with up to 5 MW nameplate capacity, that delivers at least 50% of the power generated from the system to multiple residential customers within the same utility territory as the facility.
- There are a variety of community solar ownership models that can be considered, including community-owned solar, third-party-owned community solar, and utility-owned community solar.



Solar for All Program

- A program that ensures low-income households have access to residential rooftop and residential-serving community solar energy, often through providing financial support and other incentives.
- These programs ensure low-income households receive the benefits of residential distributed solar by providing customers household savings, community ownership, energy resilience, and other meaningful benefits.
- Solar programs can extend beyond solar generating capacity to include associated storage and enabling upgrades that allow for the deployment of solar energy in low-income and disadvantaged communities.
- Programs may also include solar project-deployment technical assistance such as workforce training programs that enable underserved communities to participate in the economic opportunity created by the energy transition.



Subaward

• The term "subaward" means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient even if the agreement is referred to as a contract.





APPENDIX B Questions & Answers – Status Update

Last Updated: September 5, 2023

Clarification of Electricity Cost Savings vs. Energy Cost Savings

• 20% household savings is defined as 20% of the average household electricity bill in the utility territory (Page 12 of NOFO).



Clarification of 20% Energy Efficiency Savings

Question: Is there an Energy Efficiency Savings of 20% or are participants receiving credit from the solar project? Do these houses have to have energy savings done before they have solar installed or can the cost savings be from an energy credit? What is within scope of the 20% minimum household savings?

- Household savings can be delivered as a direct financial benefit or, for households without an individual utility bill, a direct non-financial benefit equivalent in value to the program's household savings target in the utility territory.
- Applicants may propose preliminary estimates in the financial assistance model for household savings and explain how they plan on refining those estimates during the first year of the program if more analysis is needed. EPA expects to work with grantees to refine estimates for household savings
- In addition, EPA recommends that applicants adopt a flexible definition of enabling upgrades to address the various
 infrastructure barriers inhibiting solar deployment for low-income and disadvantaged communities. Financial assistance
 for enabling upgrades should be no more than 20% of the total program financial assistance in the lifetime of the
 program.
- Applicants should calculate 20% household savings from the average electricity expenditures of the average household in the utility territory. This financial benefit does not need to be calculated per each individual household and can be based on averages in the utility territory the applicant is serving. Applicants should calibrate the calculation of this financial benefit to the frequency financial benefits are delivered to the households (i.e., monthly bill credits should deliver 20% household savings based on the monthly electricity bill).
- Applicants will need to deliver these benefits net of any costs households incur from participating in the program. For example, if the program requires applicants to pay a subscriber fee, then the savings must exceed the fee so that households still experience a financial benefit of 20% the average household electricity bill.



EPA's Definition of "Behind-the-Meter"

- This question was asked to EPA on 8/28.
- Can grantees use program funds to provide financial assistance to solar projects that are not behind-the-meter?
 - Yes, grantees may use program funds to financially assist solar projects not behind the meter. Still, projects that are not behind the meter must be residential-serving solar projects according to the definition of residential rooftop solar and residential-serving community solar defined in Section I.D: Competition Terminology of the Notice of Funding Opportunity.



Clarification of 20% Threshold

- 20% household savings is defined as 20% of the average household electricity bill in the utility territory.
- Household savings can be delivered as a direct financial benefit or, for households without an individual utility bill, a direct non-financial benefit equivalent in value to the program's household savings target in the utility territory.



- Costs for advisory councils to meet the GGRF program objectives
- <u>https://www.epa.gov/sites/default/files/2018-</u>
 <u>05/documents/recipient_guidance_selected_items_of_cost_final.pdf</u>
 - EPA interprets the term "advisory council" to include groups of individuals who are not employees of the recipient that provide strategic and policy advice to the organization.
 - Costs for advisory councils that are integrated into the recipient's ongoing operations to provide advice on the overall direction of the organization should be classified as indirect costs since these activities benefit the recipient organization generally.
 - If a recipient establishes an advisory council that provides advice solely on an EPA funded activity such as a training program or research project, the costs may be allocable to the EPA agreement and charged directly to the EPA award with AEO prior approval. The scope of work and related budget narrative must describe the advisory council's membership, functions, and costs and explain why the advisory council is necessary to carry out the EPA funded project.
 - Allowable direct advisory council costs include reasonable stipends and travel support for council members while providing advice on the EPA funded project. Stipends that are structured as "retainer fees" that do not compensate the council member for actual work on an EPA funded project are not allowable as direct costs. Costs for meals and light refreshments for advisory council meetings are subject to the allowability criteria in Section 3, Entertainment and Section 5, Meals and light refreshments at conferences.



- Entertainment (Section 3):
 - EPA considers costs for evening receptions and banquets as entertainment. EPA policy precludes AEOs from approving costs for meals, light refreshments, and space rental for any portion of these events where alcohol is served, purchased, or otherwise available as part of the event, even if EPA funds are not used to purchase the alcohol and the recipient identifies a programmatic purpose for the event.
 - AEOs may approve reasonable entertainment costs for activities necessary to carry out environmental education programs and outreach projects that have clearly defined programmatic purposes. Examples of allowable entertainment costs include films, videos and other forms of audio visual communication that promote environmental protection. Costs for artistic performances may be allowable in limited circumstances such as a traditional tribal ceremony highlighting environmental stewardship to open or close a conference or a puppet show with environmental education content for children.



- Meals and Light Refreshments at Conferences (Section 5):
 - Under 2 CFR 200.432, meals and refreshments are allowable conference costs unless "... restricted by the terms and conditions of the [EPA] award." EPA's General Terms and Conditions contain restrictions on the allowability of the costs for meals and light refreshments at conferences.



- Meals and Light Refreshments at Conferences (Section 5, continued):
 - POs make initial determinations regarding the allowability of costs for meals and light refreshments on a case-by-case basis considering reasonableness and necessity under the standards described below. AEOs make the final decision on cost allowability when he or she approves the scope of work describing the conference and the budget narrative specifying the amount of funding for the event. However, an AEO's approval of the budget for an agreement based on a general description of a conference does not make costs for unallowable items such as alcoholic beverages or an evening reception or banquet where alcohol is present allowable.
 - Eligibility Determination. To be eligible for funding under assistance agreements, the light refreshment and meal costs must not be prohibited by statute, regulation, appropriation, program guidance or this guidance document. This includes program guidance contained in an assistance agreement solicitation announcement or the terms of the assistance agreement.
 - Purpose Determination. The purpose of the conference must be to:
 - Disseminate environmental information related to EPA approved scope of work;
 - Provide environmental or public health education related to EPA approved scope of work;
 - Discuss environmental science, policy, or programs related to EPA approved scope of work;
 - Conduct outreach to the public on environmental concerns or issues related to EPA approved scope of work;
 - Obtain community involvement in an activity described by the EPA approved scope of work; or,
 - Carry out an activity that is otherwise necessary for the recipient to achieve the objectives of the EPA approved scope of work.
 - At least one condition described above must be met for a purpose determination.



- Meals and Light Refreshments at Conferences (Section 5, continued):
 - Time determination. The length or timing of the event must be such that light refreshments or meals are necessary for the effective and efficient achievement of its purpose.
 - Reasonableness determination. The costs for light refreshments and meals must be identified in the budget narrative in order to determine the reasonableness for costs on a per event basis. Recipients must demonstrate that the costs for light refreshments and meals are reasonable given such factors as the purpose of the event and costs for similar publicly funded business events at the facility. If recipients cannot establish that the costs for meals and light refreshment represent prudent expenditures of public funds, the costs are unallowable.



- Unallowable Light Refreshment and Meal Costs:
 - Costs for light refreshments and meals for recipient staff meetings and similar day-to-day activities are not allowable under EPA assistance agreements.
 - EPA policy prohibits the use of EPA funds for meals and light refreshments at evening receptions, banquets and similar activities that unless the recipient has provided a justification that has been expressly approved by the AEO. An example of an activity where EPA funds may be used for meals or light refreshment is an evening working meeting as defined below.
 - EPA funding for meals, light refreshments, and space rental may not be used for any portion of any conference event including receptions, banquets and working meetings where alcohol is served, purchased, or otherwise available as part of the event or meeting, even if EPA funds are not used to purchase the alcohol.



- Definitions:
 - Evening Receptions or banquets: Events that take place at conferences after normal business hours primarily for networking, celebrations and other social purposes.
 - Light refreshments: U.S. General Services Administration regulations define "light refreshments" for morning, afternoon or evening breaks to include, but not be limited to, coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins. (41 CFR 301- 74.71).
 - Meals: The term "meals" refers to food served during traditional times for breakfast, lunch and dinner and includes food served by wait staff to seated individuals as well as self-serve buffets, and continental breakfasts.
 - Evening working meetings: Evening events in which small groups discuss technical subjects on the basis of a structured agenda or there are presentations being conducted by experts.



How is program evaluation defined?

- Applicants should include plans for conducting evaluations of their GGRF program administration and project portfolios.
- Program evaluations should include assessment of effectiveness and efficiency in achieving outputs, outcomes, and objectives as described in the logic model.
- All evaluations must be conducted in adherence with ORDER 1000.33 03/25/2022 U.S. Environmental Protection Agency Policy for Evaluations and Other Evidence-Building Activities, including timely publication of findings.
- You should have a plan to integrate program evaluation activities into the reporting plan, including assessing effectiveness and efficiency in achieving outputs and outcomes.
- Evaluations should be conducted in adherence with <u>EPA Order 1000.33, U.S.</u> <u>Environmental Protection Agency Policy for Evaluations and Other Evidence-Building</u> <u>Activities</u>, including timely publication of findings. EPA Order 1000.33 provides a framework to comply with the Foundations for Evidence-Based Policymaking Act of 2018.



Would homeless shelters qualify as multi-family housing?

Asked to EPA on 9/3.

- What does EPA consider a "residential" building? Does this include buildings in which people live but do not own or rent (e.g., hospitals)? Does this include households that are also agricultural businesses?
 - EPA's Solar for All competition is designed to deliver the benefits of solar energy to households. Solar for All grantees can fund both residential rooftop solar projects and residential-serving community solar projects so long as the projects serve households. These projects can be sited on buildings in which people live but do not own or rent so long as the project serves households.
 - As described in Section I.D: Competition Terminology, residential rooftop solar is defined as any behind-the-meter solar photovoltaic (PV) power-producing facilities, including rooftop, pole-mounted, and ground-mounted PV systems, that support individual households in existing and new single-family homes, manufactured homes, and multifamily buildings. The definition of residential rooftop solar includes behind-the-meter solar facilities serving multifamily buildings classified as commercial buildings so long as the solar facility benefits individual households either directly or indirectly such as through tenant benefit agreements. Residential rooftop solar includes properties that are both rented and owned.
 - Residential-serving community solar is defined as a solar PV power-producing facility or solar energy purchasing
 program from a power-producing facility, with up to 5 MW nameplate capacity, that delivers at least 50% of the
 power generated from the system to multiple residential customers within the same utility territory as the facility.
 There are a variety of community solar ownership models that can be considered, including community-owned
 solar, third-party-owned community solar, and utility-owned community solar.



How much of the \$400M needs to go towards rooftop residential?

- Most applicants should use at least 75% of program funds on financial assistance and should maximize solar deployment funded by this program. EPA will evaluate proposals more favorably if the applicant proposes to use 75% of program funds or more on financial assistance.
- These targets for financial assistance to solar projects includes financial assistance for associated storage and enabling upgrades in conjunction with a solar project supported under this program. The remaining funds may be used for project-development technical assistance and program administration.



Community Solar: Does a particular solar project need to offset for entire complex?

• The solar project needs to deliver at least 50% of the power generated from the system to multiple residential customers within the same utility territory as the facility.



Definitions and Examples Regarding Maintenance

 Additionally, the application will be evaluated on the quality and extent of the plan to supporting operations, maintenance, and recycling of the assets funded under the program for the lifetime of the assets (i.e., approximately 20 years), including ensuring maximum energy output of the assets and conducting audits of assets to ensure operations and maintenance is performed (page 56 of NOFO).



What are EPA's Procurement Rules Re: Solar For All?

- Refer to EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for EPA's policies on competitive procurements and encouraging the use of small and disadvantaged business enterprises.
 - <u>https://www.epa.gov/grants/best-practice-guide-procuring-services-supplies-and-equipment-under-epa-assistance</u>
- Review the proposed procurement, in accordance with 2 CFR § 200.317 and 2 CFR § 200.318.
- A grantee who transfers funds awarded through this competition must comply with the Procurement Standards in 2 CFR § 200 and 1500.
- For example, EPA will not accept sole source justifications for proposed procurement contracts for services such as environmental consulting and engineering that are available in the commercial marketplace.



What are Program Income requirements and when/if do they terminate? End of performance period?

- An applicant may propose a financial assistance strategy which generates program income (as defined at 2 CFR § 200.1 and includes, but is not limited to, repayments of the principal on loans, interest on loans, loan origination fees and may include other income from investments of GGRF grant funds). EPA specific rules on program income are provided at 2 CFR § 1500.8. EPA will negotiate terms and conditions governing program income with a successful applicant who will use EPA funding to capitalize revolving loan funds.
- Consistent with 2 CFR § 200.1, program income means gross income earned by the grantee that is directly
 generated by a supported activity or earned as a result of the grant award.
- For this competition, program income includes but is not limited to origination fees, interest payments, income from principal and interest payments on loans made with federal award funds (e.g., repayments from revolving loan funds), interest from short-term securities (e.g., cash deposits of program income), asset sales, and other sources of program income (e.g., proceeds from bonds issued by governmental entities that were financed with EPA grant funds). EPA-specific rules on program income are provided at 2 CFR § 1500.8.
 - <u>https://www.ecfr.gov/current/title-2/subtitle-B/chapter-XV/part-1500/subpart-D/subject-group-</u> <u>ECFRafb95c49532a236/section-1500.8</u>
- Asked about requirements termination to EPA on 9/3.



Can funding go towards long-term maintenance to repair/replace infrastructure down the line?

Asked to EPA on 9/3.



Are O&M packages extending beyond the period of performance eligible costs?

Asked to EPA on 9/3.



How to break down budgets to differentiate via different offering (residential v. community), subrecipients, etc.?

- Applicants must itemize costs related to personnel, fringe benefits, travel, equipment, installation or labor supplies, contractual costs, other direct costs (i.e., subawards, participant support costs), indirect costs, and total costs.
- Broken up by:
 - Direct vs. Indirect Costs
 - Categories (listed above)
 - Years (1-5)
 - Activity Bucket



Is there a requirement for certification of solar installers?

• Asked to EPA on 9/3.



Breakdown of Cost Thresholds

	Small Programs	Medium Programs	Large Programs
Award range	\$25 million and up to \$100 million	Greater than \$100 million and up to \$250	Greater than \$250 million and up to \$400
		million	million
Total	Fewer than 1 million	Between 1 million	Greater than 5 million
population of	people	people and 5 million	people
disadvantaged		people, inclusive	
census tracts			
identified by			
CEJST in the			
geography the			
program will cover			
Number of	Up to 35	Up to 20	Up to 5
awards EPA	•	•	
anticipates			
making			

100% of Solar for All funds
must be deployed "to
enable low-income and
disadvantaged
communities to deploy or
benefit from zeroemissions technologies".

•

- Target at least 75% of funds towards Financial Assistance.
- Financial assistance for enabling upgrades may comprise up to 20% of the total financial assistance deployed during the lifetime of the program.



How does the EPA define "technical assistance?"

- Technical assistance is defined as "project-deployment technical assistance" and is services and tools provided by grantees to communities and energy stakeholders to overcome non-financial barriers to solar deployment. Examples of these services and tools include workforce training, customer outreach and education, project deployment assistance such as siting, permitting, and interconnection support (including procurement of services and tools from National Labs), and coordination with utilities for the purposes of project deployment. (Page 10 of NOFO)
- All financial and technical assistance funded through GGRF's Solar for All competition must enable low-income and disadvantaged communities to deploy and benefit from solar and storage.
- As defined in Section I.D: Competition Terminology, eligible project-deployment technical assistance includes community engagement strategies, including education, outreach, and dissemination of information to the public; customer acquisition support; management and verification requirements; cross-program coordination specific to project deployment (e.g., engaging with DOE's WAP); workforce training; and other wrap-around program support elements. Applicants should detail in their application the market barriers in the geography they are applying to serve and how they will use project-deployment technical assistance to address those barriers.
- Allowable Costs: Costs for eligible technical assistance as defined in Section I.D: Competition Terminology. Eligible technical assistance examples include workforce training, customer outreach and education, project development & deployment assistance (including services and tools from National Labs), and coordination with utilities for the purposes of project deployment.

