

# **30 Million Solar Homes Implementation Guide**

By Katie Kienbaum and John Farrell August 2021



SOLAR UNITED

## **About 30 Million Solar Homes**

The Initiative for Energy Justice, the Institute for Local Self-Reliance, and Solar United Neighbors convened the 30 Million Solar Homes initiative to advance equitable federal policies that could bring the benefits of local solar energy to the equivalent of 30 million American households. More than 300 organizations and businesses have signed on in support of 30 Million Solar Homes. Learn more at www.30millionsolarhomes.org.

The Initiative for Energy Justice (IEJ) provides law and policy resources to advocates and policymakers to advance local and state shifts to equitable clean energy. IEJ addresses the persistent gap between grassroots communities at the frontlines of the climate justice fight and those sitting at relevant policymaking tables, and connects grassroots-led solutions with the best-available data, evidence, and scholarship. Through concrete technical policy tools and project models, IEJ supports frontline communities, justice-based organizations, and policymakers to foreground equity in a just transition to renewable energy. Learn more at **iejusa.org**.

The Institute for Local Self-Reliance (ILSR) is a national research and advocacy organization that partners with allies across the country to build an American economy driven by local priorities and accountable to people and the planet. Whether it's fighting back against the outsize power of monopolies like Amazon, ensuring high-quality locally driven broadband service for all, or advocating to keep local renewable energy in the community that produced it, ILSR advocates for solutions that harness the power of citizens and communities. Learn more at www.ilsr.org.

Solar United Neighbors (SUN) is a national 501(c)3 nonprofit that represents the needs and interests of solar owners and supporters across the country. SUN has been helping people go solar, join together, and fight for their energy rights since 2007. Learn more at **www.solarunitedneighbors.org**.

## **About the Authors**

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The authors would like to thank all individuals and organizations who helped create the 30 Million Solar Homes policies and provided feedback on those policies, including participants in the Equity Working Group organized by IEJ and organizations that have signed on in support. Additional thanks to lowincome solar expert Jason Edens of JBJ World Industries and the staff at World Resources Institute for their valuable advice and insight.



#### **Cover Photo:**

Installing a low-income community solar array with students from Leech Lake Tribal College in Minnesota. Credit: Jason Edens



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Photo credit: Solar United Neighbors

# Introduction

When policymakers announce ambitious new proposals to address pressing needs, such as the 30 Million Solar Homes policy platform, much of the attention is focused on passing the legislation through Congress and signing it into law. Yet, the success of these efforts often lies in the implementation of the new programs and regulations by federal agencies. This guide aims to explain how that step in the process – implementation – could work for the 30 Million Solar Homes policy proposal, explaining who makes the decisions that would shape implementation and how they are made.

The 30 Million Solar Homes policy platform identifies new and existing federal policies and programs that could catalyze widespread and equitable adoption of rooftop and community solar, to power the equivalent of one in four households across the United States. This guide is a companion to our full platform, **available online**. For information on the policy recommendations, the benefits of 30 million solar-powered homes, or the campaign, please visit **30MillionSolarHomes.org** or read our report **The National Impact of 30 Million Solar Homes**.

Policies and programs included in the 30 Million Solar Homes platform tap into the jurisdictions of several federal agencies. Additionally, many of these agency programs effectively delegate funding and implementation to states, leaving numerous points of intervention for participants or advocates to guide the outcomes. This guide follows the flow of dollars from Congress to federal agencies to states and local jurisdictions to Americans' homes and communities, explaining (in a simplified manner) where key decisions are made and how Americans can influence the results of the policies passed by their elected officials. Considering the broad scale of the 30 Million Solar Homes proposal, this guide serves as an introduction to the many processes and offices that would be involved in implementation.

Though this guide focuses on the 30 Million Solar Homes policy platform, much of the information presented here is broadly applicable to the implementation of federal clean energy efforts. The



Solar installation at the American Indian Community Housing Organization in Duluth, Minnesota. Photo credit: Jason Edens

30 Million Solar Homes platform as a whole has not yet been realized in federal legislation, so we have made assumptions to how policies and programs may be structured. However, lawmakers in Congress have included various aspects of the policy recommendations and similar provisions in proposed legislation, making the issue of implementation an approaching concern.

#### This guide contains three main sections:

#### **1. GENERAL IMPLEMENTATION CONSIDERATIONS**

Part 1 includes important considerations and strategies for the federal government to equitably implement significant new federal clean energy programming, such as the 30 Million Solar Homes policy platform.

#### 2. IMPLEMENTATION BY AGENCY AND PROGRAM

Part 2 gives an overview of agencies' budgetary capacities for growth and a summary of implementation processes for key programs and policies.

#### **3. ADDITIONAL RESOURCES FOR STAKEHOLDERS**

Part 3 provides information to help advocates, local officials, and other stakeholders engage in the implementation of policies and programs recommended by the 30 Million Solar Homes campaign, including resources on the federal rulemaking process and relevant federal contacts.



Photo credit: John Farrell

# General Implementation Considerations

We have identified several broad strategies for the federal government to consider as it implements massive investments in solar power and other clean energy technologies, such as through the 30 Million Solar Homes policy platform.

#### These strategies include:

- Systematically Increase Program Size to Dramatically Scale Deployment
- Target Underrepresented Groups for Massive Workforce Growth
- Identify and Serve Historically Marginalized Communities
- Prioritize Wealth-Building Opportunities, Economic Benefits, and Ownership
- Coordinate with Relevant Federal, State, Local, Territorial, and Tribal Agencies

Each category is examined in detail below, highlighting possible challenges and specific implementation strategies.

# Systematically Increase Program Size to Dramatically Scale Deployment

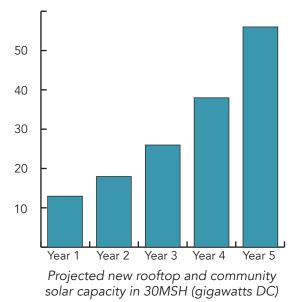
The 30 Million Solar Homes proposal would entail a dramatic increase in the installation of local rooftop and community solar. Over the course of the initiative, the proposal projects deployment of 13 gigawatts of local solar in the first year, ramping up to 56 gigawatts installed in year five. To support this growth, federal agencies

must oversee a rapid expansion of solar financing and grant programs — totaling \$137 billion in direct federal investment in local solar deployment — and develop methods to effectively increase program sizes.

There are a number of challenges the administration and federal agencies could face as they rapidly grow solar programs. Difficulties scaling up administrative capacity quickly enough could prevent agencies from effectively managing and disbursing funds. On the other side, programs could struggle with low participation caused by inadequate outreach and other barriers. Both of these issues could result in unused funds stuck in an undersubscribed or ineffective program.

Additional challenges include workforce and/or materials shortages that constrain solar growth and state, utility, or local barriers to solar deployment, such as slow interconnection timelines.

### 30 Million Solar Homes Would Increase Distributed Solar Significantly



- Systematically increase program size for new and existing programs to allow agencies to effectively scale up activities.
  - Grow programs at different and specific rates to ensure more rapid deployment where possible
     for example, existing solar programs with established processes, skilled staff, and high demand
     (e.g. Weatherization Assistance Program) may be able to increase in scale more quickly than newly
     created programs (e.g. Solar for Schools).
  - Take into account that increased funding for solar financing programs may also require similarly increased funding for outreach and technical assistance for financing applicants and recipients.
  - Learn from past experiences, such as the **challenges and successes** of implementing increased funding for the Weatherization Assistance Program after the 2008 recession, when determining program growth rates.

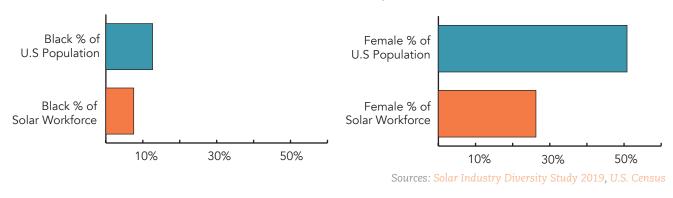
- Assess program performance and make adjustments to program administration and funding levels as necessary to facilitate growth.
  - Ensure programs aimed at overcoming barriers to solar adoption, such as low income or lack of homeownership, have adequate funding for outreach to enable growth. (Lessons from the D.C. Solar for All Program, for example, highlighted the importance of finding trusted messengers to connect with low-income participants.)
  - Reallocate funding from underutilized or inequitable programs to programs that have greater unmet need, better serve historically marginalized communities, or can scale more quickly, where appropriate and feasible.
  - Solicit robust community input to assess program performance.

## Target Underrepresented Groups for Massive Workforce Growth

The massive increase in local solar deployment called for by the 30 Million Solar Homes campaign demands a similarly large growth in the solar workforce. The federal government must ensure these new positions are good, well-paying jobs accessible to Americans of all colors and backgrounds.

Currently, Black and female workers are **underrepresented in the overall solar workforce**, and a disproportionately large majority of senior executives in the solar industry are white men. Investing in education, workforce, and business development support for underrepresented groups is necessary to ensure both greater equity and massive growth in the solar industry.

To achieve these goals, the federal government must address the dual challenges of massively increasing the solar workforce while also making the industry more diverse and equitable. One particular issue to watch for and to overcome is diversity in management roles — especially executive positions — remaining stagnant while other parts of the workforce diversify. A study from 2019 found that solar executives are 80 percent male and 88 percent white, for example. Another possible challenge to be aware of is growing concentration in the solar installation field that pushes out locally-owned enterprises and fails to build wealth in historically marginalized communities.



#### Black and Female Workers Are Underrepresented in Solar Workforce

- Target investments in solar workforce development for underrepresented groups to a variety of career paths and stages, to ensure greater expertise and diversity throughout the solar industry.
  - Invest in workforce training and education for solar industry careers including installation, manufacturing, research and development, engineering, business administration, and marketing, at a variety of career stages, from entry-level training to mid-career professional development and executive leadership development.
  - Also include support for the creation of small businesses and worker cooperatives in solar workforce programs to help build, and widely distribute, wealth within communities. (For instance, the nonprofit WE ACT facilitated the creation of a worker-owned solar installation cooperative by graduates of its worker training program, which serves many low-income workers and people of color; federal workforce programs could support similar efforts to pair training and business formation. The White House Environmental Justice Advisory Council's final recommendations noted that the development of worker cooperatives offers greater opportunities to workers of color in particular.)
- Ensure federal solar workforce programs are accessible by funding paid apprenticeships, providing compensation for training participants, and addressing other barriers such as childcare or transportation.
- Partner with expert entities, including trade and community colleges, nonprofit solar developers, and solar businesses, to create solar workforce programs, in order to tap into existing networks and assets. (In Washington, D.C., the local government partnered with nonprofit GRID Alternatives to train workers and install solar panels as part of its Solar Works DC program.)



Photo credit: Solar United Neighbors

- Prioritize federal financing for solar deployment for projects that promote an equitable workforce, such as through working with certified small businesses including Small Disadvantaged Businesses, Women-Owned Small Businesses (WOSBs), Minority Business Enterprises (MBEs), or Veteran-Owned Small Businesses (VOSBs); incorporating local hiring and workforce development elements; and providing good wages and meeting labor standards.
- Require federally-funded solar deployment projects to prioritize hiring businesses owned by underrepresented groups (including Small Disadvantaged Businesses, WOSBs, MBEs, and VOSBs) and businesses with local employees who are representative of area demographics. (As an example, the Illinois Solar for All program required participating projects to hire trainees from certain workforce development programs targeting low-income and environmental justice communities.)

# Identify and Serve Historically Marginalized Communities

The 30 Million Solar Homes campaign sets a goal of ensuring 75 percent of the initiative's federal investments benefit historically marginalized communities. Currently, access to the benefits of solar energy is unequal — **rooftop solar adopters** on average tend to have disproportionately high incomes and to live in communities with relatively higher white populations. To ensure the benefits of local solar accrue to communities with historic underinvestment, the federal government must develop methods to identify, consult with, and overcome barriers to solar adoption in these communities.

Under the **Justice40 Initiative**, the Biden-Harris administration is now committed to delivering 40 percent of federal climate and clean energy program benefits to disadvantaged communities. As part of these efforts, the **White House Environmental Justice Advisory Council** issued a **set of recommendations**; administration officials looked to these recommendations to develop the **Interim Implementation Guidance for the Justice40 Initiative**, which provides greater clarity on the federal programs that fall under Justice40, the definition of "disadvantaged community," and the stakeholder consultation process. This leadership begins to address some of the challenges to better serving historically marginalized communities, including how to develop definitions that balance inclusion with precision and how to engage with impacted communities.

As federal agencies implement Justice40 and other equity-minded initiatives like 30 Million Solar Homes, they must overcome barriers to participation, both in outreach efforts and in program delivery. Possible challenges include a lack of trust in government entities; community needs such as language translation, childcare, transportation, and time availability; excessive burdens to prove program eligibility; and other solar adoption barriers such as not owning the home, physical building deficiencies, or low credit scores. Agencies could face additional difficulties in quickly making needed program changes identified through community feedback.

- Develop definitions and tools to identify historically marginalized communities and other groups of people that have unequal access to the benefits of solar energy.
  - Use or build off of existing resources, including the Environmental Protection Agency's EJSCREEN, the Department of Energy's Low-Income Energy Affordability Data (LEAD) tool, and the forthcoming Climate and Economic Justice Screening Tool from the White House Council on Environmental Quality.
  - Include low- and moderate- income communities, environmental justice communities, and "solar deserts" (areas with low or no solar deployment) in considerations of groups with unequal access.
  - Combine information from sources such as demographic mapping and census data with robust community input to design definitions and to verify data accuracy and relevance on the ground.
  - Balance goals for investing in geographically diverse areas with serving the most in-need communities.
     (In New York, the Climate Justice Working Group has considered different approaches to categorizing "disadvantaged communities," which would affect how many communities outside of New York City are prioritized for state clean energy investments.)

- Prioritize identified groups for federally-funded local solar deployment.
  - Implement specific program carveouts for identified historically marginalized communities, or create prioritization systems, where possible — for example, the 30 Million Solar Homes policy platform recommends setting aside a certain percentage of Rural Energy for America Program funding for projects on tribal lands.
- Engage communities and stakeholders early in the program implementation process to help guide planning and to ensure input is fully incorporated; continue to engage throughout implementation.
  - Specifically, work with stakeholders to identify potential unintended impacts of implementation decisions and barriers to program participation.
  - Create a periodic evaluation process that includes robust input from marginalized communities to identify any necessary program improvements.
- Take advantage of local expertise and networks by partnering with community organizations and units of local government to gather input, plan implementation, and administer programs.
  - Delegate funding and implementation responsibilities, including community outreach, directly to local entities where feasible. (For instance, both the Weatherization Assistance Program and the Low Income Home Energy Assistance Program devolve delivery of services to state grantees and local subgrantees.)
  - Consider regional differences in needs and resources.



Photo credit: Solar United Neighbors

- Make community participation in program planning and implementation accessible by proactively addressing potential barriers.
  - Consult with community organizations and other local entities to help identify and overcome potential barriers to participation.
  - Consider needs like childcare, language translation, varied public meeting times, transportation, etc.

- Overcome barriers to participation in federal solar and clean energy programs in historically marginalized communities.
  - Make eligibility criteria flexible to reduce burdens on program participants, for example by allowing participation in income-qualified government programs such as SNAP to serve as proof of eligibility, by qualifying entire geographic areas, or by streamlining reporting requirements.
  - Explore opportunities for automatic enrollment in certain clean energy programs.
  - Identify and address barriers to solar adoption and program participation faced by targeted communities, including by investing in robust community outreach, coordinating with other government and community entities, and connecting participants with other resources. (As an example, the DC Solar for All single-family program conducted extensive outreach to low-income households, including one-on-one home visits, materials translated into Spanish, and partnerships with neighborhood associations.)
  - Coordinate solar programs with other programs that provide relevant services, such as home repair and rehabilitation or energy efficiency (e.g. the Weatherization Assistance Program and Single Family Housing Repair Loans & Grants).
  - Actively provide outreach and technical assistance to under-resourced communities so program participation isn't limited to communities with established community infrastructure, such as local advocates and nonprofit organizations.
- Track and publicly report federal program metrics, including demographic data, to ensure communities are equitably served and to encourage accountability. (The Minneapolis Green Cost Share Program **public dashboard** is an example of how this information could be shared.)



## Prioritize Wealth-Building Opportunities, Economic Benefits, and Ownership

One of the major benefits of rooftop and community solar is that these investments can help build wealth, strengthen political power, and improve economic opportunities in communities across the country. These opportunities include electricity bill savings (which can allow families to spend more on other essentials such as education), new solar careers and small businesses, **increased home values**, and greater autonomy over the



Photo credit: Solar United Neighbors

use and cost of energy. The federal government must make sure that investments in local solar energy lead to direct financial benefits for households and contribute to long-term community wealth.

Possible challenges to achieving these benefits include solar ownership barriers, such as lack of homeownership, low credit scores, and other impediments to traditional financing. Other challenges could limit the financial impact of rooftop or community solar for families — for example, if tenants' energy costs are included in rent as a flat fee or if ongoing maintenance and operations costs are higher than expected. Even when bill savings or solar jobs do provide economic benefits, on their own they don't necessarily grow the long-term wealth of individual households and neighborhoods without robust community ownership.

- Require federally funded projects to provide direct economic benefits for households where possible, such as through net energy metering, and prioritize projects that provide the most benefits.
  - Identify alternative methods to provide economic benefits to households where necessary, such as by providing rent reductions or direct payments to households that have electricity costs included in rent. (The Illinois Solar for All program allowed multifamily buildings with tenants who don't pay individual electric bills to participate if benefits could be provided by other means, such as rent reductions or unit upgrades.)
  - In particular, ensure that solar and efficiency cost savings are passed down to residents of federally subsidized housing, by having HUD issue new guidance on calculating utility allowances. (As an example, HUD released similar guidance in 2019 to ensure California affordable housing residents could benefit from a state solar program.)
- Prioritize federal funding for projects that result in ownership of the rooftop solar panels or the community solar shares by individual households or a community group (either instantly or after a certain time period).

- Support accessible solar financing programs for individuals who face barriers to traditional financing, including low-income households, people with low credit scores, and practitioners of faiths that do not permit interest collection.
  - Prioritize financial institutions and other entities with accessible, inclusive solar financing programs when providing start-up capital through programs such as a National Green Bank.
  - Provide technical assistance and guidance on establishing inclusive utility investment programs, such as Pay as you Save® financing, to utilities, financial institutions, community organizations, and other stakeholders. (The Environmental Protection Agency is creating a new Energy Star Home Upgrade program which will focus on deploying energy savings measures in underserved communities through inclusive utility investments and other efforts.)
  - Issue federal guidelines encouraging clean energy financing programs to offer inclusive financing alternatives to interest-bearing loans to accommodate religious practices that forbid collecting interest.
- Consider the long-term economic impacts and implications of local solar deployment on households and communities, to make benefits sustainable.
  - Incorporate future maintenance and operations costs into solar grant and financing programs where applicable to ensure long-term financial stability for participating households. (For instance, the DC Solar for All single-family program included extended warranties and free inspection visits for participating low-income households.)
  - Consider the impact of loans and other financing on individuals' overall financial health to avoid overleveraging low-income households.
- Provide support for small businesses and worker-owned cooperatives as part of solar workforce development to encourage local wealth-building.

# **Coordinate with Relevant Federal, State, Local, Territorial, and Tribal Agencies**

A broad network of federal, state, territorial, tribal, and local government agencies would be required to implement the 30 Million Solar Homes policy recommendations and integrate new programs with existing ones. Efforts to deploy local solar across the country must effectively coordinate across all levels of government to maximize impact.

Attempts to boost coordination could face a number of barriers, including lack of familiarity with (or distrust of) other government agencies and their programs, tendencies to maintain the status quo, and time constraints that limit new partnership development. Also, attempts to engage across different governments or agencies could be interpreted as interference and could meet resistance or gatekeeping.

- Create a 30 Million Solar Homes interagency partnership to facilitate cooperation across federal departments and with other governments.
  - Use the interagency partnership as a venue to promote collaboration across all public and private partners, disseminate best practices, collect and report program metrics, oversee program evaluation, and maintain public accountability and transparency.
  - Learn from other interagency partnerships, such as the Clean Energy Savings for All Initiative or the Interagency Working Group on Coal and Power Plant Communities and Economic Revitalization, as well as from interagency collaboration best practices.
  - Track the overall success of meeting the 30 Million Solar Homes goal of ensuring 75 percent of total investments benefit marginalized communities.
- Consult early on with other agencies and governments that have relevant expertise or that will be responsible for implementation, to ensure their input can be incorporated fully into implementation plans.
  - At this stage, identify other programs at different levels of government that could coordinate with 30 Million Solar Homes programs, including to conduct outreach, reach certain populations, and provide complementary services (such as home repair).
  - For programs that will be administered at the local level, ensure program timelines and procedures are flexible enough to align with existing state and local government processes.
- Continue to evaluate and improve programs based on feedback and best practices from agency and government partners.
- Respect the sovereignty of tribal governments and the right to self-determination of indigenous communities.
  - Engage in robust tribal consultation, and practice the principles of free, prior, and informed consent.
  - Defer to tribal governments and communities to determine which federal resources would be most helpful.



Photo credit: Jason Edens



# Implementation by Agency and Program

# **Department of Agriculture (USDA)**

The USDA has several programs encouraging clean energy deployment. This guide addresses implementation steps for three programs included in the 30 Million Solar Homes proposal.

### USDA Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size	
Rural Business Cooperative Service				
Rural Energy for America Program (REAP)	Existing	\$50 million annual mandatory funding	\$250 million annual mandatory funding, on average	
Rural Utilities Service				
Energy Efficiency and Conservation Loan Program (EECLP)	Existing	\$5.5 billion loan authority enacted in FY21 for entire Electric Loan Program	N/A - Not recommending additional funding	
Rural Energy Savings Program (RESP)	Existing	\$11 million discretionary funding enacted in FY21, \$75 million discretionary annual funding authorized in 2018 Farm Bill	\$150 million annual discretionary funding	

**USDA Total Budget FY21:** \$216 billion (\$27 billion discretionary, \$188 billion mandatory)

Sources: USDA FY 2022 Budget Summary; Budget of the U.S. Government, FY 2022; CRS Report R40913, Version 36; CRS Report IF10288, Version 18

## **Rural Energy for America Program**

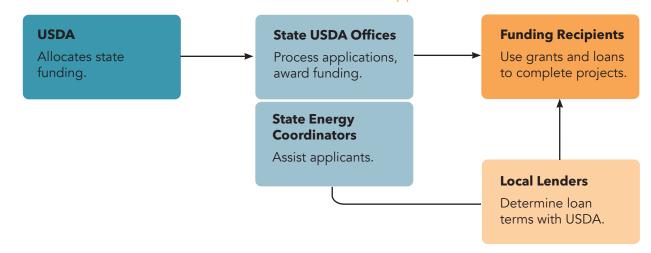
The **Rural Energy for America Program** (REAP) provides partial matching grants and loan guarantees to support clean energy for small businesses and agricultural producers in rural areas. In addition to increased funding, the 30 Million Solar Homes initiative recommends expanding program eligibility to nonprofits and residences in rural areas, and lowering the eligibility threshold for small agricultural producers.<sup>1</sup>

REAP funding runs through **state USDA offices** (with some offices representing multiple states/territories). Key government decision makers include the state staff as well as **State Energy Coordinators** who support program applicants. Guaranteed loans are processed through private lenders, such as local banks, which review credit factors to determine eligibility along with state agency staff.

➔ For more on our policy recommendations for REAP, see page 6 in the 30 Million Solar Homes Policy Platform and pages 26-27 in The National Impact of 30 Million Solar Homes.

#### Process summary:

- Congress passes legislation.
- USDA conducts rulemaking process and develops new program guidance as needed depending on amendments to program eligibility.
- Federal offices allocate funding to states based on prior use.
- Applications processed through state offices (47 offices; some supporting multiple states/territories).
- State Energy Coordinators (36 coordinators; some supporting multiple states/territories) support applicants, oversee the programs, and guide funding decisions.
- Local lenders review applicant creditworthiness and work with state staff to determine eligibility, loan amounts, and loan terms. Credit factors to be analyzed include but are not limited to character, capacity, capital, collateral, and conditions.
- Grant and loan guarantee recipients implement projects.



#### **REAP** Grant and Loan Guarantee Application Process

# Rural Energy Savings Program and Energy Efficiency and Conservation Loan Program

Both the **Rural Energy Savings Program** (RESP) and the **Energy Efficiency and Conservation Loan Program** (EECLP) provide capital to rural electric cooperatives to be re-lent to electric customers for clean energy projects such as rooftop solar or energy efficiency. Proposals for the 30 Million Solar Homes initiative would reduce participation barriers and encourage greater participation through increased outreach to cooperatives. Ultimately, the programs are limited more by the willingness of cooperatives to participate, not by federal funding.

→ For more on our policy recommendations for RESP and EECLP, see page 10 in the
 30 Million Solar Homes Policy Platform and pages 26-27 in The National Impact
 of 30 Million Solar Homes.

#### **Process summary:**

- USDA conducts increased outreach to promote EECLP and RESP and addresses participation barriers.
- Rural electric cooperatives apply with USDA for funds through EECLP or RESP to provide the capital at low interest rates to implement customer clean energy investments.
- Cooperatives implement energy savings and clean energy programs for customers.
- Customers repay their cooperative utility with a share of their clean energy savings. Cooperatives, in turn, repay USDA.
- USDA conducts periodic reviews to evaluate and improve programs.



Photo credit: John Farrell

## **Department of Energy (DOE)**

The DOE has numerous programs encouraging clean energy deployment, in addition to clean energy research, manufacturing, and workforce development. This guide addresses implementation steps for ten programs, existing and proposed, included in the 30 Million Solar Homes platform.

#### DOE Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size
OFFICE OF ENERGY EFFICIENCY	AND RENEWABLE ENERGY		
Weatherization and Intergovernmer	ntal Programs Office		
Weatherization Assistance Program (WAP)	Existing	\$310 million enacted in FY21	\$10 billion annual funding, on average
Energy Efficiency and Conservation Block Grant (EECBG)	Reauthorization - recommended by 30 MSH	\$3.2 billion total funding (currently inactive)	\$2.5 billion annual funding, on average
Solar Energy Technologies Office			
SolarAPP+	Existing	NREL allocated \$4 million in March 2021 to support development through 2023	\$20 million annual funding
Solar Workforce Development Programs for Underrepresented Groups	New - recommended by 30 MSH	\$280 million enacted for FY21 for Solar Energy Technologies Office overall	\$100 million annual funding
Office TBD			
Solar Grant Program for Underfunded Schools	New - recommended by 30 MSH	N/A - New	\$3.5 billion annual funding, on average
Solar Grant Program for Historically Marginalized Communities	New - recommended by 30 MSH	N/A - New	\$2.5 billion annual funding, on average
Community Solar Financing	New - recommended by 30 MSH	N/A - New	\$200 m. average annual funding for installation, \$40 m. average annual funding for pre-development
Resilience Solar + Storage Grant Competition	New - recommended by 30 MSH	N/A - New	\$3.1 billion annual funding, on average
National Solar Marketplace	New - recommended by 30 MSH	N/A - New	\$10 million annual funding
Solar Education and Outreach Grants	New - recommended by 30 MSH	N/A - New	\$20 million annual funding, on average

#### DOE Total Budget FY21: \$40 billion discretionary

Sources: DOE FY 2022 Budget in Brief; DOE FY 2022 Budget, Volume 3.1; Budget of the U.S. Government, FY 2022; CDBG-DR Rebuild by Design, HUD Exchange; CDBG-NDR National Disaster Resilience, HUD Exchange; "NREL app expected to significantly speed up US residential solar permitting," Emma Penrod, Utility Dive

## Weatherization Assistance Program

DOE's **Weatherization Assistance Program** (WAP) installs weatherization upgrades and other energy saving measures in low-income households to reduce energy burdens. The 30 Million Solar Homes platform recommends

dramatically increasing program funding and expanding eligibility for the program, to bring the benefits of energy savings to more households. The policy recommendations also include measures to increase the use of rooftop solar and community solar in local weatherization programs. Additionally, the 30 Million Solar Homes campaign suggests program administrators prepare annual equity reports to address any program disparities.

➔ For more on our policy recommendations for WAP, see page 5 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

Implementation of WAP is largely handed down to state, territorial, and tribal grantees, with local entities delivering the program to households.

The administering agency varies from state to state and is often the state department responsible for economic development or human services. **Community action agencies** frequently serve as weatherization service providers at the local level.

#### Solar in WAP process summary:

- Congress passes legislation making changes to WAP and appropriates funds.
- DOE conducts rulemaking process as necessary to establish new program details.
- DOE offers technical assistance on incorporating solar into WAP services to state and local administrators, including guidance on:
  - Including solar energy in grantee's annual weatherization plans.
  - Training WAP energy auditors on solar site assessments and the benefits of solar energy.
  - Creating new positions for solar subject matter experts.
  - Assessing savings-to-investment ratios for solar energy.
  - Coordinating with LIHEAP to connect households to community solar.
  - Prioritizing solar contractors that support local hiring and/or workforce development programs for underrepresented groups, and partnering with trade and community colleges.
- DOE issues Funding Opportunity Announcement, with information on program requirements.
- State, territorial, and tribal grantees submit annual weatherization plans to DOE for approval.
- DOE allocates appropriated funds to grantees.
- Grantees provide funds to local weatherization service providers.

(Continues on next page.)

- Weatherization service providers identify eligible households, refer walkaway deferrals to community solar programs, train in-house workers on solar or subcontract services, and complete installations.
- Inspections completed at the service provider, state and DOE levels.
- Grantees complete equity reports and identify strategies for reducing disparities related to household characteristics, such as race or homeownership status.

#### DOE State WAP Depts. **Issues** funding Incorporate solar into annual plans, allocate announcement, approves state annual plans, and funds to local WAP allocates funding. service proivders. **Transfer from State LIHEAP Funds** (Optional source of additional funds.) WAP Service Providers Deferrals **LIHEAP Community** Identify eligible **Solar Programs** households, refer deferrals to LIHEAP, choose whether to subcontract solar or complete in-house. **Subcontractors WAP Service Providers** Train workers, install Install solar on suitable solar on suitable homes. homes. WAP Service State WAP DOE **Providers** Depts. Inspection. Inspection. Inspection.

### Solar in WAP Simplified Process

#### **Potential implementation partners:**

- National Community Action Partnership Association of community action agencies.
- National Association for State Community Services Programs Association of state WAP administrators.

## **Energy Efficiency and Conservation Block Grant**

The Energy Efficiency and Conservation Block Grant (EECBG) program provided block grants and competitive grants to tribal, territorial, state, and local governments for energy efficiency upgrades, solar financing programs, and a variety of other clean energy efforts. Administered by the Office of Weatherization and Intergovernmental Programs (WIP) at DOE Office of Energy Efficiency and Renewable Energy (EERE), the one-time program was first funded as part of recovery efforts after the 2008 financial crash. As part of the 30 Million Solar Homes policy platform, we recommend funding the program again and providing technical assistance on deploying solar in historically marginalized communities to block grant recipients.

→ For more on our policy recommendations for EECBG see pages 10 -11 in the 30
 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Congress reauthorizes program and appropriates funding.
- DOE conducts rulemaking process as necessary to establish updated program details, possibly including:
  - Formulas for allocating block grants.
  - Composition and function of the state and local advisory committee.
  - Additional eligible uses of grant funding.
  - Application process for competitive grants.
- DOE establishes a state and local advisory committee, to advise on implementation of the EECBG program.
- DOE offers technical assistance to eligible entities on developing solar programs and other possible uses of the block grants.
- DOE allocates formula block grants to eligible entities.
  - Eligible formula block grant recipients must submit and receive DOE approval for an energy efficiency and conservation strategy before receiving funds.
  - State block grant recipients sub-grant a portion of funds to local governments not eligible for direct formula block grants.
- DOE evaluates applications and awards competitive grants.
- EECBG Project Officers and other Weatherization and Intergovernmental Programs staff assist block grant recipients with program implementation and reporting requirements.

## SolarAPP+

The National Renewable Energy Laboratory recently released **SolarAPP+**, a software tool to allow for streamlined, virtual permitting for residential solar installations. With over 18,000 "authorities having jurisdiction" (cities, counties, etc.), solar development can be slowed by inconsistent and time-consuming permitting processes.

SolarAPP+ promises to reduce jurisdiction staff time, to improve permitting clarity, and to save money by reducing developer time in the permitting process. The role of the federal government in deploying SolarAPP+ is education and engagement, helping cities, counties, and other authorities adopt this useful tool.

→ For more on our policy recommendations for SolarAPP+, see page 11 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- DOE continues outreach and engagement to identify new jurisdictions to adopt the SolarAPP+.
- Local governments and jurisdictions adopt use of SolarAPP+ for permitting.
- Solar developers use SolarAPP+ to apply for permits.

## Solar Workforce Development Programs for Underrepresented Groups

To facilitate massive workforce growth, the 30 Million Solar Homes proposal recommends the creation of workforce development programs for underrepresented groups at the DOE Solar Energy Technologies Office (SETO). This would likely involve the establishment of multiple related programs in order to cover the wide

range of career and business opportunities in the solar industry. Though the programs would be new, SETO could build off of lessons learned and partnerships developed in prior initiatives, such as the Solar Training and Education for Professionals program and the Solar Training Network.

→ For more on our policy recommendations for this program, see page 14 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish program details, possibly including:
  - Eligibility requirements for participants from underserved groups.
  - Program structures for education and training in different career fields, to the extent this is left open in legislation.
  - Federal funding levels for apprenticeships or training stipends.
- DOE and SETO launch programs, in cooperation with outside partners.
- DOE conducts periodic reviews to evaluate and improve programs.

## **Solar Grant Program for Underfunded Schools**

The 30 Million Solar Homes proposal recommends creating a new grant program to help schools install on-site solar panels, targeting at least 75 percent of funding to schools that serve historically marginalized communities.

A similar program included in the **bipartisan Senate infrastructure bill** passed in early August 2021 would create a competitive grant program at the DOE to award funds directly to consortia of local educational agencies, schools, nonprofit organizations, and/or other partnering groups for renewable energy and energy efficiency upgrades. (Alternatively, this program could be designed so that the DOE distributes funds to states to subgrant to schools and other local entities.) This program could be housed under the Office of Energy Efficiency and Renewable Energy.

→ For more on our policy recommendations for this program see page 8 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish program details, possibly including:
  - Guidelines on eligible entities (which could include non-instructional buildings, community colleges, or charter schools, in addition to instructional K-12 public schools).
  - Requirements for funded projects.
  - Application timelines, processes, and evaluation criteria.
  - Implementation of a funding carveout for schools serving historically marginalized communities.
  - Reporting requirements.
- Once DOE launches program, eligible entities apply for grant funding to implement projects.
- DOE reviews applications and awards funds based on pre-established evaluation criteria.
- DOE conducts periodic reviews to evaluate and improve the program.

#### **Examples of similar state- and local-level grant programs:**

- Illinois Solar Schools Program operated by the Illinois Clean Energy Community Foundation.
- Cook County Solar Schools Grant Program operated by the Cook County (Illinois) Department of Environment and Sustainability.
- Wisconsin Solar on Schools Program operated by the Midwest Renewable Energy Association and the Couillard Solar Foundation.
- North Carolina Solar+ Schools Program operated by NC GreenPower.
- Minnesota Solar on Schools Program will be administered by the Minnesota Department of Commerce (established in 2021).

## **Solar Grant Program for Historically Marginalized Communities**

The 30 Million Solar Homes policy recommendations include funding a grant program at the DOE for on-site solar and community solar installation projects to benefit members of historically marginalized communities.<sup>2</sup> Eligible applicants would include local, state, territorial, and tribal governments; nonprofit organizations; and solar developers. Before the DOE could begin awarding funding under the new program, it would have to determine various implementation details, such as application processes. The program could be administered by the Office of Energy Efficiency and Renewable Energy.

→ For more on our policy recommendations for this program see pages 5-6 in the
 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact
 of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish program details, possibly including:
  - Eligible applicants and projects.
  - Definitions of historically marginalized communities.
  - Requirements for equitable community solar projects.
  - Guidelines for what constitutes as "benefits" for participating households.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- Once DOE launches program, eligible entities apply for grant funding to implement projects.
- DOE reviews applications and awards funds based on pre-established evaluation criteria.
- DOE conducts periodic reviews to evaluate and improve program.

#### Application and Funding Process for New Solar Grant Program





Photo credit: Solar United Neighbors

## **Community Solar Financing**

The 30 Million Solar Homes policy proposal would create a financing program at the DOE to provide forgivable loans and loan guarantees to fund the planning and installation of community-owned, equitable community solar systems.<sup>3</sup> As this would be a new program, the DOE would have to further develop the specific details of the program, such as application processes, in order to implement it. This program could possibly be administered by the Office of Energy Efficiency and Renewable Energy.

→ For more on our policy recommendations for this program see pages 8-9 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish program details, possibly including:
  - Eligibility requirements for equitable community solar project developers.
  - Eligible pre-development activities.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- Once DOE launches program, eligible entities apply for financing to plan implement projects.
- DOE reviews applications and awards funds based on pre-established evaluation criteria.
- DOE conducts periodic reviews to evaluate and improve program.

## **Resilience Solar + Storage Grant Competition**

To reduce vulnerability to power outages, the 30 Million Solar Homes campaign recommends creating a competitive grant program at the DOE for distributed solar plus storage projects in historically marginalized communities. The program can be modeled after the **Energy Resilient Communities Act**, with all funds reserved for use in marginalized communities, and it can incorporate best practices from the Department of Housing and Urban Development's **Rebuild by Design** and **National Disaster Resilience** competitions. This program could be housed under the Office of Energy Efficiency and Renewable Energy.

→ For more on our policy recommendations for this program, see page 13 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish program details, possibly including:
  - Guidelines on eligible applicants and projects.
  - Definitions of environmental justice community and historically marginalized community.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- DOE establishes educational outreach program to inform eligible entities of funding opportunity.
- Once DOE launches program, eligible entities apply for grant funding to implement projects.
- DOE reviews applications and awards funds based on pre-established evaluation criteria.
- DOE conducts periodic reviews to evaluate and improve program.



Photo credit: John Farrell

## **National Solar Marketplace**

The 30 Million Solar Homes program aims to reduce residential solar energy costs by encouraging more competitive pricing. Several providers, such as EnergySage or Angie's List, already have a tool to request multiple bids from contractors for projects. However, in the case of several states, they may not have more than a single solar installer participating. Allocating funding to the DOE, potentially the Office of Energy Efficiency and Renewable Energy, to create a national solar marketplace could help fill in the gap.

The DOE could opt to create a federal competitive bidding platform, partner with private providers to recruit more solar installers, or some combination of strategies.

#### **Process summary:**

- Congress passes legislation directing DOE.
- DOE explores best approach to building a national solar marketplace in consultation with stakeholders, considering options such as the creation of a new platform or federal assistance in recruiting solar installers to existing platforms.
- DOE develops and implements project.

## **Solar Education and Outreach Grants**

It's essential to the success of federal clean energy efforts that communities understand the benefits of solar and other renewable energy technologies and are aware of federal program opportunities. To achieve this, the 30 Million Solar Homes policy platform includes additional funding for education and outreach activities at DOE's Office of Energy Efficiency and Renewable Energy, including a competitive grant program for outreach programs in historically marginalized communities developed by local governments and community organizations.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- DOE conducts rulemaking process as necessary to establish grant program details, possibly including:
  - Eligible applicants and projects.
  - Definition of historically marginalized community.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- Once DOE launches program, eligible entities apply for grant funding for outreach programs.
- DOE reviews applications and awards funds based on pre-established evaluation criteria.
- DOE conducts periodic reviews to evaluate and improve grant program.

→ For more on our policy recommendations for this program, see page 11 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

 → For more on our policy recommendations for this program, see page 15 in the 30 Million Solar Homes Policy Platform and pages 24-25 in The National Impact of 30 Million Solar Homes.

# **Department of Health and Human Services (DHHS)**

The DHHS administers the Low Income Home Energy Assistance program, which the 30 Million Solar Homes proposal recommends incorporating with local solar. This guide shows how to implement the proposed changes.

## DHHS Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size		
Administration for Children and Families (ACF) - Division of Energy Assistance					
Low Income Home Energy Assistance Program (LIHEAP)	Existing	\$3.75 billion enacted in FY21 (American Rescue Plan included an additional \$4.5 billion)	Estimated \$30 billion annual funding, on average (dependent on size of eligible population)		
LIHEAP Residential Energy Assistance Challenge (REACH) Program	Reauthorization - recommended by 30 MSH	Inactive - disbursed \$2.5 million in FY10, \$1.5 million in FY12	\$1 billion annual funding, on average		
LIHEAP Pay for Success	New - recommended by 30 MSH	N/A - New	Estimated \$1.2 billion annual funding, on average (cost depends on success of programs)		
Tribal LIHEAP Management Grants	New - recommended by 30 MSH	N/A - New	Estimated \$50-100 million annual funding		

DHHS Total Budget FY21: \$1.6 trillion (\$100 billion discretionary, \$1.5 trillion mandatory)

Sources: DHHS FY 2022 Budget in Brief; Budget of the U.S. Government, FY 2022; LIHEAP IM 2010-12, Awards of REACH Grants FY 2010; LIHEAP IM 2012-7 Grant Awards for the REACH Program FY 2012

## Low Income Home Energy Assistance Program

The Low Income Home Energy Assistance Program (LIHEAP) provides energy bill assistance to low-income households through one-time, direct payments to utilities. Currently, the program only serves a small fraction of eligible households.

To bring the benefits of reduced energy burdens to more households, the 30 Million Solar Homes campaign recommends increasing funding and widening eligibility for LIHEAP, while also incorporating community and rooftop solar energy into the program to reduce energy bills over the long term. One method to better incorporate solar is an approach we refer to as Community Solar for Community Action, which provides participating households with community solar shares in solar installations owned by local LIHEAP service providers. Congress can also encourage innovation in LIHEAP by requiring a certain amount of program funds to be set aside for solar, restarting the Residential Energy Assistance Challenge (REACH) program, and encouraging use of **Pay for Success** financial tools. In addition, the proposal calls on DHHS to provide grants and greater assistance to tribal governments that want to manage their own LIHEAP programs. With all of these approaches, it's essential that new programs do not reduce funds available for much-needed direct bill assistance.

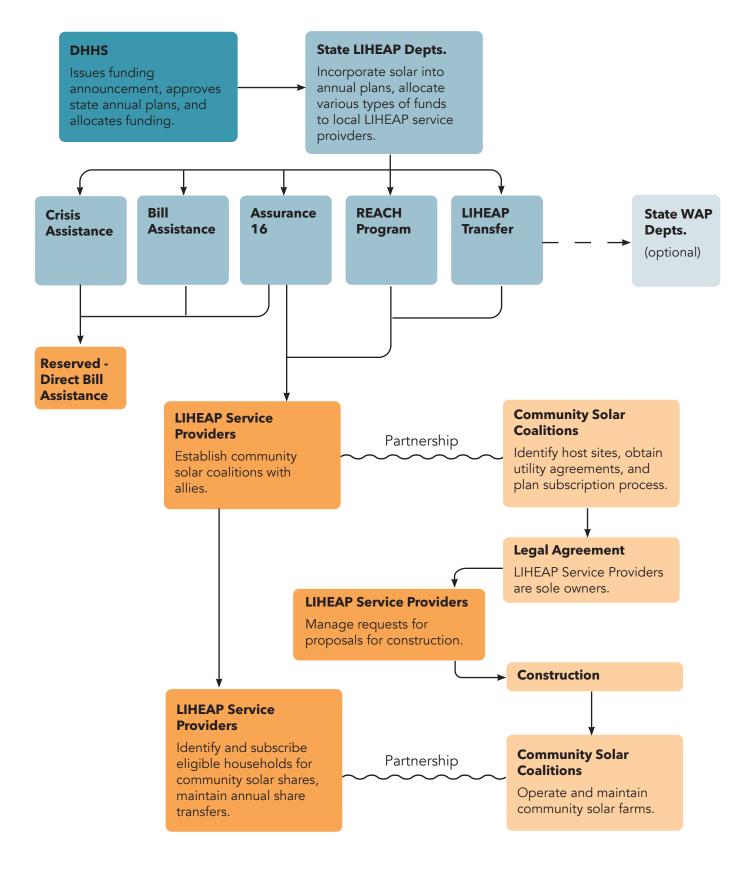
State, territorial, and tribal grantees are responsible for administering LIHEAP; the government department varies by grantee. Service providers also vary at the local level — in many states, county agencies and/or **community action agencies** deliver services to households.

→ For more on our LIHEAP recommendations, see pages 3-5 in the 30 Million
 Solar Homes Policy Platform and pages 22-23 in The National Impact of 30
 Million Solar Homes.

#### Solar LIHEAP process summary:

- Congress passes legislation making changes to LIHEAP and appropriates funds.
- DHHS conducts rulemaking process as necessary to establish new program details.
- DHHS offers technical assistance to state and local LIHEAP administrators, including guidance on:
  - Incorporating solar into annual plans.
  - Creating new positions for solar subject matter experts.
  - Developing community solar projects to be owned by local service providers, and administering bill assistance in the form of annually transferrable community solar shares.
- DHHS issues Funding Opportunity Announcement, with information on program requirements.
- State, territorial, and tribal grantees submit annual plans to DHHS for approval.
- DHHS allocates appropriated funds to grantees.
- Grantees set aside a portion of funds for solar installations as well as weatherization measures under the Transfer mechanism, often transferring funds to state WAP programs.
- Grantees provide funds to local LIHEAP service providers.
- LIHEAP service providers identify eligible households and provide information on the community solar share program.
- LIHEAP service providers coordinate with coalitions of other entities to develop community solar projects, to be owned by the service providers, and issue RFPs for construction.
- LIHEAP service providers subscribe households to annually transferrable community solar shares.
- Coalition partners perform ongoing maintenance of community solar installations and LIHEAP service providers manage subscriptions.
- Grantees complete equity reports and identify strategies for reducing disparities related to household characteristics, such as race or homeownership status.

## Simplified Process for LIHEAP Community Solar Programs



#### **REACH grant program process summary:**

- Passage and appropriation of funds by Congress.
- DHHS conducts rulemaking process as necessary to establish new program details.
- Once DHHS launches program, eligible states, territories, and tribes apply for grants.
- DHHS reviews applications and awards funds based on pre-established evaluation criteria.
- Grantees implement projects, in coordination with local partners.
- DHHS conducts periodic reviews to evaluate and improve program.

#### Pay for Success process summary:

- Congress potentially passes legislation encouraging and enabling LIHEAP providers to engage in Pay for Success projects.
- DHHS provides guidance and technical assistance to grantees on implementing Pay for Success project financing for innovative solar initiatives in LIHEAP.
- State, territorial, and tribal grantees and local subgrantees partner with investors and other stakeholders to develop and implement innovative projects integrating solar into LIHEAP delivery.
- Investors receive payment if projects meet specified goals.

#### Tribal management grants process summary:

- Passage and appropriation of funds by Congress.
- DHHS alerts tribes there is a path to managing LIHEAP services without the state as an intermediary and offers technical assistance.
- DHHS conducts rulemaking process as necessary to establish grant program details.
- Once DHHS launches program, eligible tribes apply for grants.
- DHHS reviews applications and awards funds based on pre-established evaluation criteria.
- DHHS conducts periodic reviews to evaluate and improve program.

#### **Potential implementation partners:**

- National Energy Assistance Directors' Association Association of state LIHEAP administrators.
- National Energy & Utility Affordability Coalition Nonprofit focused on energy needs of low-income households.

# **Department of Housing and Urban Development (HUD)**

HUD conducts housing and community development activities across the country that the agency could leverage to increase solar energy deployment. This guide explores implementation steps for policies and programs recommended by the 30 Million Solar Homes campaign.

## HUD Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size		
Office of Community Planning and Development					
Community Development Block Grant	Existing	Approx. \$3.5 billion total in FY21	Nominal additional costs for program administration and technical assistance		
Office of Public and Indian Housing					
Renew300	Reinstatement - recommended by 30 MSH	Inactive - discontinued in 2017	Nominal additional costs for program administration and technical assistance		
Solar Grants for Properties Participating in Housing Choice Voucher Program	New - recommended by 30 MSH	N/A - New	\$500 million annual funding, on average		
HUD Total Budget FY21: \$69 billion (\$45 billion discretionary, \$24 billion mandatory)					

Sources: HUD FY 2022 Congressional Justifications; Budget of the U.S. Government, FY 2022

## **Community Development Block Grant Program**

HUD's **Community Development Block Grant** (CDBG) programs, administered by the Office of Community Planning and Development, provide formula grant funding to state, territorial, and local governments to fund housing and economic development efforts, primarily to benefit low- and moderate-income residents. To

catalyze greater equitable solar deployment, the 30 Million Solar Homes proposal recommends HUD provides technical assistance to grantees on establishing local loan loss reserves to support accessible financing programs for solar energy and other solar deployment programs. It also suggests creating a Section 108 Renewable Energy Loan Guarantee accelerator program to promote the use of CDBG Section 108 loan guarantees (which allow grantees to leverage CDBG funds into larger loans) to finance solar energy development in marginalized communities.

→ For more on our policy recommendations for CDBG, see page 11 in the 30 Million Solar Homes Policy Platform and page 28 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Congress passes legislation directing HUD to undertake actions and appropriates funding (optional).
- HUD provides technical assistance to grantees to help plan and establish low-income focused solar deployment programs (for both rooftops and community solar projects), as well as accessible financing programs for solar energy, such as local loan loss reserves and innovative financial pathways.
  - This includes creating an accelerator program for local economic development offices and officials to promote the use of the Section 108 Loan Guarantee program to expand access to solar energy.
- HUD allocates formula block grants to eligible entities.
  - Eligible formula block grant recipients must submit consolidated plans and annual action plans, which include community participation, before receiving funds.
  - State block grant recipients sub-grant a portion of funds to local governments not eligible for direct formula block grants.
- Grantees implement programs with awarded funding.

## Renew300

HUD should relaunch its **Renew300 initiative**, which was originally established under the Obama-Biden administration with the goal of deploying 300 megawatts of renewable energy on federally assisted housing by 2020. Before it was discontinued in 2017, the initiative provided resources on solar and renewable energy technologies to affordable housing providers. If HUD revives Renew300, it could establish a new target for renewable energy deployment on federally assisted housing and expand its training, technical assistance, and resources available for housing providers. (For instance, the **White House Environmental Justice Advisory Council recommended** setting a goal of deploying at least 3 gigawatts of local solar on federally assisted housing by 2025.)

→ For more on our policy recommendations for this program, see page 7 in the
 30 Million Solar Homes Policy Platform and page 28 in The National Impact
 of 30 Million Solar Homes.

#### **Process summary:**

- HUD and Biden-Harris administration relaunch initiative, following authorization and appropriation of funds from Congress if necessary.
- HUD assesses the status of past pledges from providers and sets a new deployment goal.
- HUD creates renewable energy resources and establishes technical assistance programs for housing providers, in coordination with partners such as the National Community Solar Partnership at the Department of Energy.

## Solar Grants for Properties Participating in Housing Choice Voucher Program

The 30 Million Solar Homes policy platform includes a new competitive grant program at HUD for public housing agencies to establish local solar grant programs for building owners that participate in the **Section 8/Housing Choice Voucher program**. HUD's Office of Public and Indian Housing would likely administer this new program. To implement it, HUD would have to develop various program details — including guidelines on how funded solar installations should benefit residents and protections on continued housing affordability — and individual housing agencies would have to create their own local grant programs.

➔ For more on our policy recommendations for this program, see page 7 in the 30 Million Solar Homes Policy Platform and page 28 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- HUD conducts rulemaking process as necessary to establish program details, possibly including:
  - Eligible applicants and uses of grant funds.
  - Guidelines for how benefits can be passed on to residents.
  - Requirements for participating building owners to guarantee continued housing affordability.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- HUD provides guidance and technical assistance to public housing agencies on establishing local grant programs.
- Once HUD launches program, eligible entities apply for funding to develop local grant programs.
- HUD reviews applications and awards funds based on pre-established evaluation criteria.
- Public housing authorities launch local grant programs.
- HUD conducts periodic reviews to evaluate and improve grant program.

#### Funding Allocation Process for Solar Grants for Properties in Housing Choice Voucher Process



## **Guidelines for Utility Allowances and Clean Energy Savings**

The 30 Million Solar Homes policy recommendations call on HUD to issue national guidance enabling residents of federally subsidized housing to pocket the financial benefits of rooftop solar installations, community solar subscriptions, and energy efficiency improvements. This guidance should direct housing providers to exclude bill credits from solar, as well as other energy cost savings from efficiency upgrades, from calculations of income and utility allowances, and it can be modeled on **HUD's 2019 guidance** for California's Solar on Multifamily Affordable Housing program.<sup>4</sup>

To ensure providers of federally-subsidized housing are able to implement the new guidance, HUD should provide in-depth guidelines on how to apply the new directive and offer assistance to housing agencies. It's important for HUD to obtain robust stakeholder input prior to issuing the new guidance, to avoid unintended negative consequences.

#### **Process summary:**

- Congress directs HUD to issue new guidance.
- HUD seeks input from stakeholders.
- HUD's office of Public and Indian Housing develops and issues guidance, which should also include details such as:
  - Which clean energy improvements and/or subscriptions this guidance applies to.
  - How to calculate savings from solar or efficiency upgrades that don't result in a bill credit, such as from Virtual Net Energy Metering.
- Housing providers apply guidance, with further assistance from HUD as necessary.
- HUD evaluates effectiveness and verifies guidance is being applied correctly.

## **Prohibition on Homeowner Association Solar Bans**

The 30 Million Solar Homes policy proposal recommends that HUD issues regulations prohibiting homeowners associations from restricting the ability of homeowners to deploy solar energy on their property. Legislation can be modeled on the provision in Sec. 209 of the **American Clean Energy** and Security Act of 2009 (the Waxman-Markey Bill).

#### **Process summary:**

- Congress passes legislation directing HUD to issue new regulation.
- HUD conducts rulemaking process to develop new regulation, with consultation from DOE.

→ For more on our recommendations for this policy, see page 11 in the 30 Million Solar Homes Policy Platform and page 28 in The National Impact of 30 Million Solar Homes.

➡ For more on our recommendations for this policy, see pages 6-7 in the 30 Million Solar Homes Policy Platform and page 28 in The National Impact of 30 Million Solar Homes.

## **Department of the Interior (DOI)**

The DOI interfaces with tribal governments across the country and is well positioned to distribute clean energy investments for tribal communities. This section of the implementation guide addresses implementation steps for a proposed solar + storage grant program for tribal communities.

#### DOI Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size
Bureau of Indian Affairs			
Solar + Storage Grant Program for Tribal Communities	New - recommended by 30 MSH	N/A - New	\$80 million annual funding, on average

DOI Total Budget FY21: \$26.9 billion

Sources: DOI FY 2022 Budget in Brief

## **Solar + Storage Grant Program for Tribal Communities**

To connect Native Americans living on tribal lands without access to home electrification — in particular the **thousands of households** without electricity in the Navajo Nation — the 30 Million Solar Homes Campaign recommends creating a new grant program at the DOI for solar plus storage systems for off-grid tribal homes and businesses. An important part of the implementation process for this new program will involve consulting with tribal governments and other stakeholders to ensure it abides by the principles of tribal sovereignty.

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- In consultation with tribal governments, DOI conducts rulemaking process as necessary to establish grant program details, possibly including:
  - Eligible applicants and projects.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- Once DOI launches program, eligible applicants apply for grant funding.
- DOI reviews applications and awards funds.
- DOI conducts periodic reviews to evaluate and improve grant program.

➔ For more on our policy recommendations for this program, see page 6 in the 30 Million Solar Homes Policy Platform and page 29 in The National Impact of 30 Million Solar Homes.

## **Department of the Treasury (USDT)**

The USDT administers federal clean energy tax credits. This guide addresses implementation steps for two existing tax credit programs and explores implementation options for four additional clean energy financing programs proposed in the 30 Million Solar Homes policy platform.

### USDT Program Budget Comparison Table

Program / Policy	Existing or New?	Current Size	30 Million Solar Homes Recommended Size		
Internal Revenue Service					
Solar Investment Tax Credit (ITC)	Existing	\$4.82 billion in federal FY21	Estimated increase of \$30 billion total marginal cost over 5 years as a result of the recommended policy changes		
Low-Income Housing Tax Credit (LIHTC)	Existing	\$9.36 billion in federal FY21	N/A - Recommending change in implementation, not funding		
Bureau of the Fiscal Service					
Clean Energy Victory Bonds (CEVB)	New - recommended by 30 MSH	N/A - New	\$10 billion issued annually, on average		
Community Development Financial Institutions Fund					
National Loan Loss Reserve	New - recommended by 30 MSH	N/A - New	Total loan loss reserve of \$1 billion, over 5 years		
CDFI Loan Loss Reserve Seed Grant Program	New - recommended by 30 MSH	N/A - New	\$100 million annual funding, on average		
Other					
National Green Bank	New - recommended by 30 MSH	N/A - New	Total capitalization of \$100 billion, over 5 years		
<b>USDT Total Budget FY21:</b> \$13.5 billion discretionary*, estimated \$1.3 trillion mandatory^					

\* Excluding international programs, PIAA, and TEOAF

^ Including Covid emergency funding

Sources: USDT FY 2022 Budget in Brief; USDT 2021 Tax Expenditures; Budget of the U.S. Government, FY 2022

### **Solar Investment Tax Credit**

With a brief exception during the aftermath of the 2008 financial crisis, recipients of the residential or commercial **solar Investment Tax Credit** have had to have tax liability to offset with the credit to take full advantage of it. Should the 30 Million Solar Homes initiatives be adopted, this would change, allowing any solar project owner to receive the incentive as a "direct pay" option for installations two megawatts and smaller. The proposal would also restore and extend the life of the credit.<sup>5</sup>

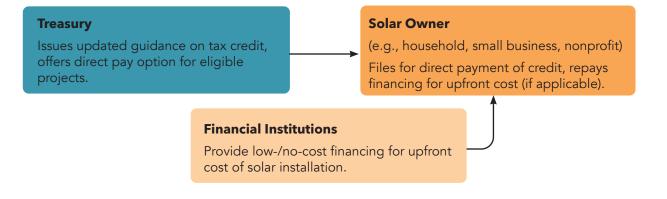
With this change, there are a number of opportunities to expand solar ownership via the tax credit, including informing non-taxable entities (such as cities or nonprofits) that they are eligible, informing low tax liability individuals that they can receive the incentive, and informing all solar project owners that they can receive the incentive in a more timely fashion than through filing their tax return. Key constituencies include state solar energy trade associations, solar developers, state energy offices, city sustainability departments, and others.

→ For more on our recommendations for this program, see page 3 in the 30
 Million Solar Homes Policy Platform and pages 20-21 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Congress passes legislation to extend credit and create direct pay option.
- The Treasury Department implements the changes to the tax credit, conducting the rulemaking process and issuing guidance as necessary.
- A potential solar customer learns of the solar tax incentive from the federal government, a solar developer, or other source conducting outreach.
- A person or organization has solar installed; they may receive low- or no-interest financing to cover the value of the incentive.
- Customer files for payment of the incentive with the Treasury Department (and potentially repays any loan floated to cover that upfront cost).

## Example Solar Investment Tax Credit Direct Pay Allocation Process



## Low-Income Housing Tax Credit

The 30 Million Solar Homes proposal recommends prioritizing affordable housing developments that include on-site solar installations for the allocations of credits under the **Low-Income Housing Tax Credits** (LIHTC) program. Administered by the Internal Revenue Service, the LIHTC program distributes a certain number of tax credits to each state's designated allocating agency using a formula based on population. State agencies then award credits to affordable housing developers according to their projects' alignment with the housing needs established in each agency's qualified allocation plan. Congress can direct these agencies to include on-site solar energy that provides a financial benefit to residents as a priority in their credit allocation plans.

#### **Process summary:**

- Congress passes legislation directing allocating agencies to include solar energy in selection criteria.
- State agencies revise allocation plans, with input from the public and stakeholders.
- The Treasury Department allocates tax credits to states.
- Affordable housing developers apply for credits, and state agencies award credits using allocation plans.
- Developers complete new construction or rehabilitation project, typically funded through tax equity financing.
- States monitor for compliance with affordability and other requirements and report to the agency.

## **Clean Energy Victory Bonds**

Modeled on the victory bonds sold to raise capital during World War II, **Clean Energy Victory Bonds** could be used by the federal government to finance a variety of clean energy resources, The 30 Million Solar Homes policy platform supports issuing these bonds, with targets aimed at focusing funding into marginalized communities.

#### **Process summary:**

- Passage of legislation by Congress.
- Implementation by the Treasury Department, including advertising and selling the bonds.
- Allocation by the manager of the Clean Energy Victory Bond Trust Fund (presumably in the Treasury Department) of funds to support existing federal, state, or local clean energy financing programs or to directly finance other clean energy projects.

➔ For more on our policy recommendations for CEVB, see page 9 in the 30 Million Solar Homes Policy Platform and pages 20-21 in The National Impact of 30 Million Solar Homes.

• Allocation decisions by federal, state, and local programs supported by the program.

➔ For more on our policy recommendations for LIHTC, see page 7 in the 30 Million Solar Homes Policy Platform and pages 20-21 in The National Impact of 30 Million Solar Homes.

## National Loan Loss Reserve and CDFI Loan Loss Reserve Seed Grant Program

The 30 Million Solar Homes campaign recommends creating two new loan loss reserve programs at the Treasury Department to help de-risk **Community Development Financial Institution** (CDFI) investments in an equitable clean energy transition. One program would establish a national loan loss reserve that CDFIs could use to support eligible clean energy financing programs. The other would create a competitive grant program to provide seed funding to CDFIs to establish local loan loss reserves to support solar financing programs in historically marginalized communities. The Treasury Department can consult with DOE on best practices for clean energy loan loss reserves.

#### National loan loss reserve process summary:

- Passage and appropriation of funds by Congress.
- The Treasury Department conducts rulemaking process as necessary to establish program details, possibly including:
  - Due diligence standards for lending activity.
  - Eligible CDFI clean energy programs.
  - Level of risk tolerated in lending portfolios.
  - Other conditions and requirements for CDFIs that want to access the reserve.

→ For more on our recommendations for these programs, see page 9 in the 30 Million Solar Homes Policy Platform and pages 20-21 in The National Impact of 30 Million Solar Homes.

• CDFIs develop and administer eligible clean energy financing programs, tapping into loan loss reserve funds as needed.



Photo credit: Stephen Yang/The Solutions Project (CC BY 2.0)

#### Seed grant program process summary:

- Passage and appropriation of funds by Congress.
- The Treasury Department conducts rulemaking process as necessary to establish program details, possibly including:
  - Eligible solar energy financing programs.
  - Application timelines, processes, and evaluation criteria.
  - Reporting requirements.
- Once the Treasury Department launches program, eligible CDFIs apply for funding to develop local loan loss reserves.
- The Treasury Department reviews applications and awards funds.
- CDFIs establish local loan loss reserves, potentially partnering with other entities and financial institutions to implement solar financing programs.
- The Treasury Department conducts periodic reviews to evaluate and improve grant program.

## **National Green Bank**

A national green bank would be a new federal approach to advancing clean energy, with proposals to provide as much as \$100 billion in new funding over several years. As described in **National Climate Bank Act, Senate Bill 283**, the green bank would be an independent, nonprofit institution.<sup>6</sup> As with state and international green banks, the national green bank would use its capital to make equity investments in clean energy projects and reduce the cost and risk of clean energy lending from private banks and credit unions. A national green bank would also be charged with investing a significant portion of its funds in marginalized communities (40 percent in the legislation as drafted, 75 percent in the 30 Million Solar Homes proposal).

#### **Process summary:**

- Passage and appropriation of funds by Congress.
- Selection of board of directors and establishment of the bank.
- Board appoints CEO and an advisory committee, a risk management committee, and an audit committee.
- CEO creates an internal investment and procurement division that will select investments.
- CEO creates a start-up division to help other jurisdictions establish green banks.
- The bank reports on financial activities and emissions reductions to Congress.

✤ For more on our policy recommendations for a national green bank, see pages 9-10 in the 30 Million Solar Homes Policy Platform and pages 20-21 in The National Impact of 30 Million Solar Homes.



Photo credit: Wikimedia User B137 (CC BY-SA 2.0)

## Federal Emergency Management Agency (FEMA)

This section explores how FEMA could incorporate solar energy and storage technologies into two existing disaster response and resiliency programs. The two policy suggestions have no meaningful budget impact.

## Incorporate Solar + Storage Funding Opportunities into Disaster Assistance

The 30 Million Solar Homes platform calls on FEMA to coordinate with other federal agencies to connect building owners with solar + storage financing and grant programs when providing individual disaster assistance. Through its **Individual Assistance** division, FEMA provides assistance, including home repair and rehabilitation assistance, to households in declared disaster areas. Incorporating other federal resources for solar installations and energy storage into these assistance efforts would lead to greater resiliency against future disasters.

→ For more on this policy recommendations, see page
 13 in the 30 Million Solar Homes Policy Platform.

#### **Process summary:**

- Congress passes legislation directing FEMA, or FEMA decides independently, to offer information on federal solar + storage funding programs when providing Individual Assistance.
- FEMA's Individual Assistance Division creates and integrates resources on federal solar + storage funding programs, possibly by:
  - Adding relevant funding programs to assistance databases on **DisasterAssistance.gov**.
  - Including programs in published materials, such as the "Help After a Disaster" brochure.
  - Providing printed materials and application instructions at Disaster Recovery Centers.

## **Guidance on Solar + Storage in State Hazard Mitigation Plans**

The 30 Million Solar Homes policy proposal recommends that FEMA provide state, local, and tribal governments with additional assistance on incorporating solar + storage installations into hazard mitigation plans as a strategy to reduce the risks of power outages caused by disasters and climate change. These plans are typically a requirement to access FEMA's hazard mitigation grants and other assistance. Currently, **all states and most communities** have a hazard mitigation plan in place; governments must submit new plans every five years.

→ For more on this policy recommendations, see page
 13 in the 30 Million Solar Homes Policy Platform.

#### **Process summary:**

- Congress passes legislation directing FEMA, or FEMA decides independently, to offer greater guidance on incorporating solar + storage into hazard mitigation plans.
- FEMA incorporates solar + storage into guidance on developing hazard mitigation plans, possibly by:
  - Adding solar + storage as a mitigation activity in **resources for governments developing plans**.
  - Identifying and reaching out to governments that face greater risks of and/or from power outages.
  - Providing recommendations during annual mitigation program consultations.
- State, local, and tribal governments develop and update hazard mitigation plans to include solar + storage, with consultation of government agencies and other stakeholders.



Photo credit: Jason Edens

## Federal Energy Regulatory Commission (FERC) and Utility Requirements

FERC regulates the transmission of energy resources, including electricity and fossil fuels. This section of the guide establishes implementation steps for four new policies regulating electric utilities recommended by the 30 Million Solar Homes campaign

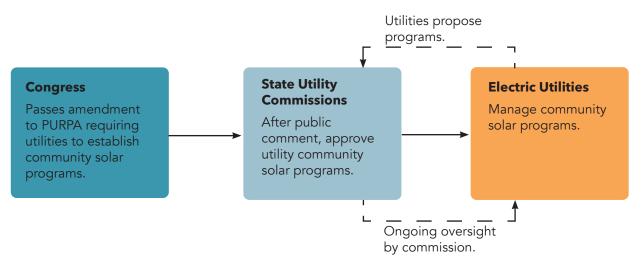
## **National Community Solar Requirement**

Expanding access to community solar is a crucial part of the 30 Million Solar Homes policy framework. It relies on an amendment to the Public Utility Regulatory Policies Act of 1978 (PURPA) to require utilities to provide access to equitable community solar. In turn, implementation of this law would be handled by individual utilities overseen at the state level by state regulatory commissions or state legislatures.

→ For more on this policy recommendation, see page 8 in the 30 Million Solar Homes Policy Platform and page 30 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Passage by Congress of an amendment to PURPA .
- Proposals by utilities to state utility commissions for approval of community solar policies. Typically, these proposals would be reviewed on an open "docket" (such as Docket 13-867 before the Minnesota Public Utilities Commission) allowing for public comment and changes to the policies.
- Utility management of community solar programs, including project queues, interconnection fees and studies, and billing arrangements.
- Ongoing oversight by state utility commissions of utility community solar programs.



#### Implementation Process for New Community Solar Programs

## **National Net Metering Requirement**

Net metering has been the bedrock state policy for enabling rooftop solar by providing an accounting framework to compensate solar owners for electricity they produce in excess of what they use. By adding up what customers use and subtracting what they produce, it allows them to pay only the net cost of their electricity use. The 30 Million Solar Homes policy would require utilities to offer net metering unless distributed solar accounted for at least 15 percent of the utility's peak energy demand.

→ For more on this policy recommendation, see pages 12-13 in the 30 Million Solar Homes Policy Platform and page 30 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Congress passes the legislation.
- FERC determines which utilities meet the compliance requirement—utilities seeking "market-based rate authority."
- These utilities adopt a compliant net energy metering regulation and submit it to the state regulatory agency for approval.
- Once approved, utilities properly credit solar customers for all energy produced.

### **Non-Transmission Alternatives Requirement**

The 30 Million Solar Homes initiative recommends that Congress amend FERC Order 1000 on "non-transmission alternatives" to require that utilities proposing new transmission issue a competitive solicitation for energy investments (such as energy efficiency, demand response aggregation, and distributed energy) that could provide equivalent service for a lower price.

→ For more on this policy recommendation, see page 12 in the 30 Million Solar Homes Policy Platform and page 30 in The National Impact of 30 Million Solar Homes.

#### **Process summary:**

- Congress passes legislation.
- With a public comment process, FERC issues an order amending Order 1000 to enforce the legislation.
- Regional transmission authorities and state regulatory commissions would enforce the order by requiring utilities to solicit competitive bids for non-transmission alternatives to transmission projects.

## **Integration Capacity Analysis and Value of Solar Calculation Requirements**

In the few states with significant deployment of distributed solar, an emerging barrier is information about existing distributed grid capacity, e.g. where do existing substations, transformers, and power lines have the capacity to absorb more solar-produced electricity. Integration capacity analysis or hosting capacity analysis involves a review of grid capacity to answer this question. The 30 Million Solar Homes platform proposes requiring utilities with solar capacity in excess of 2 percent of peak demand (and seeking "market based rate authority from the Federal Energy Regulatory Commission) to conduct such an analysis.

➔ For more on this policy recommendation, see pages 11-12 in the 30 Million Solar Homes Policy Platform and page 30 in The National Impact of 30 Million Solar Homes.

#### Hosting capacity analysis process summary:

- Congress passes legislation.
- With a public comment process, FERC issues an order to enforce the legislation.
- State regulatory agencies issue an order with guidelines and a timeline for compliance (in line with any relevant state law).
- Affected utilities develop a hosting capacity analysis, submitting it to the state regulators for approval (typically with a period for public comment).
- State regulators approve the hosting capacity analysis, including any role it will play in the interconnection process.

Another requirement of the 30 Million Solar Homes policy recommendations is a value of solar calculation meant to avoid unhelpful speculation about the costs and benefits of distributed solar for solar and non-solar customers. Modeled after the value of solar calculation used to compensate community solar projects in Minnesota, the data would help shape the right compensation for solar energy producers.

#### Value of solar process summary:

- Congress passes legislation.
- With a public comment process, FERC issues an order to enforce the legislation
- State regulatory agencies issue an order with guidelines and a timeline for compliance (18 months, if the policy is passed as recommended).
- Affected utilities develop a value of solar calculation, submitting it to the state regulators for approval (typically with a period for public comment).
- State regulators approve the value of solar, including any role it will play compensating solar energy producers.



Photo credit: Institute for Local Self-Reliance

# Additional Resources for Stakeholders

## **Federal Rulemaking Process**

To implement new laws and programs, federal agencies must generally go through a rulemaking process, which allows for public input on proposed regulations. This process is an important opportunity for community advocates and other stakeholders to influence program details and have a say in how federal legislation is implemented.

While the federal rulemaking process varies depending on the agency and the particular regulation, typical steps include:

- 1. Congress passes legislation, and the President signs it into law.
- 2. Federal agency determines if it needs to conduct rulemaking to implement the new law.
- 3. Agency gathers background research and issues a proposed rule.
- 4. Members of the public and other stakeholders file comments on the proposed rule.
- 5. Agency responds to comments and issues the final rule.

## **General Resources on Rulemaking**

#### **FEDERAL REGISTER**

- Publishes all agency rules and regulatory materials, plus presidential documents.
- FederalRegister.gov
- Reader Aids

#### **REGULATIONS.GOV**

- Online platform used by various federal agencies to post proposed regulations and receive public comments.
- Search for Regulatory Materials
- About the Regulatory Process

#### **CONGRESSIONAL RESEARCH SERVICE**

• An Overview of Federal Regulations and the Rulemaking Process

#### **REGINFO.GOV**

- The Reg Map<sup>®</sup>
- Detailed diagram of typical rulemaking process.

#### **UNION OF CONCERNED SCIENTISTS**

- Resources for Participating in Federal Rulemaking
- A Citizen's Guide to the Federal Rulemaking Process

### **Agency-Specific Resources on Rulemaking**

#### **DEPARTMENT OF AGRICULTURE**

• Regulations and Guidance

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES

- Regulations Toolkit
- Comment on Open Rules
- Guidance Documents

#### DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

- HUD's Rulemaking Process An Overview
- National Low-Income Housing Coalition Advocates' Guide '21

## **Relevant Government Offices and Contacts**

## **Department of Agriculture**

#### **RURAL UTILITIES SERVICE**

• Administers RESP and EECLP.

Contact:

- General contact information
- For RESP, contact the Electric Program Office of Customer Service and Technical Assistance Policy and Outreach Branch.
- For EECLP, contact the Electric Program Office of Loan Origination and Approval or your Electric General Field Representative.

#### **RURAL BUSINESS-COOPERATIVE SERVICE**

• Administers REAP.

Contact:

General contact information

#### STATE OFFICES

- Process REAP applications.
- State Energy Coordinators assist REAP applicants.

Contact:

- Find your state office
- Find your coordinator

## **Department of Energy**

#### OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY

Contact:

• General contact information

#### WEATHERIZATION AND INTERGOVERNMENTAL PROGRAMS OFFICE

- Part of the Office of Energy Efficiency and Renewable Energy.
- Administers WAP and State Energy Program; administered EECBG.

#### Contact:

General contact information

#### NATIONAL RENEWABLE ENERGY LABORATORY

• Developed SolarAPP+.

Contact:

- General contact information
- For SolarAPP+, contact the **SolarAPP+ team**.

#### SOLAR ENERGY TECHNOLOGIES OFFICE

- Part of the Office of Energy Efficiency and Renewable Energy.
- Provided past funding for workforce development, including through the Solar Training and Education for Professionals program.

#### Contact:

• General contact information

## **Department of Health and Human Services**

#### **DIVISION OF ENERGY ASSISTANCE**

- Part of the the Office of Community Services at the Administration for Children and Families.
- Administers LIHEAP at the federal level.

#### Contact:

• Staff contact information

## **Department of Housing and Urban Development**

#### OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

- Includes Office of Block Grant Assistance.
- Administers CDBG programs.

#### Contact:

- Headquarters contacts
- Find your local field office

#### **HUD EXCHANGE**

• Online platform for HUD program information and other resources.

#### Contact:

• Submit a contact form

### **Department of the Interior**

#### **BUREAU OF INDIAN AFFAIRS**

• Would administer the solar + storage grant program for tribal communities.

#### Contact:

• Find your regional office

### **Department of the Treasury**

#### COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS FUND

• Provides funding and technical assistance to Community Development Financial Institutions.

#### Contact:

- Help desk and general contact information
- Find your local CDFI

#### **OFFICE OF PUBLIC AND INDIAN HOUSING**

- Contains the Office of Public Housing Programs and the Office of Housing Voucher Programs.
- Distributes funds and offers direction to local public housing agencies.
- Administers Indian CDBG program.

Contact:

- Customer Service Center
- Find your local field office

## **Federal Emergency Management Agency**

#### INDIVIDUAL ASSISTANCE DIVISION

- Part of FEMA's Recovery Office.
- Provides disaster assistance, including home repair and replacement, to individuals.

Contact:

- General FEMA contact information
- Apply for assistance

#### HAZARD MITIGATION ASSISTANCE DIVISION

- Part of FEMA's Flood Insurance and Mitigation Administration.
- Administers hazard mitigation grant programs.

#### Contact:

General FEMA contact information

## **State Agencies**

#### STATE WEATHERIZATION ADMINISTRATORS

- Administer WAP at the state level.
- Often the state agency responsible for economic development, housing, or human services.

Contact:

• Find your state weatherization administrator

# LIHEAP STATE, TERRITORIAL, AND TRIBAL GRANTEES

- Administer LIHEAP at the state level.
- Often the state agency responsible for economic development, housing, or human services.

#### Contact:

- Find state and territorial LIHEAP contacts
- Find tribal LIHEAP contacts

#### HAZARD MITIGATION OFFICERS

• State points of contact for local and tribal governments for FEMA hazard mitigation subgrants.

#### Contact:

• Find your state hazard mitigation officer

#### HAZARD MITIGATION ASSISTANCE EXTERNAL STAKEHOLDER WORKING GROUP

- Made up of FEMA and state, local, and tribal government representatives.
- Shares knowledge to improve hazard mitigation assistance and serves as a point of contact.

#### Contact:

Contact the working group

#### **REGIONAL OFFICES**

• Regional mitigation staff coordinate and consult on hazard mitigation plans.

Contact:

- Find your region
- Region contact information

#### LIHTC STATE ALLOCATING AGENCIES

- Entities that award tax credits to affordable housing developers and develop allocation plans.
- Often the state housing finance agency.

Contact:

• Find your state allocating agency

#### PUBLIC UTILITY COMMISSIONS/PUBLIC SERVICE COMMISSIONS

- State regulatory bodies for electric utilities and other public utilities.
- Under 30 Million Solar Homes proposal, they would regulate utility requirements to develop community solar programs, offer net energy metering, and conduct integration capacity and value of solar analyses.

Contact:

• Find your state commission

## **Local Entities**

#### **COMMUNITY ACTION AGENCIES**

• Typically deliver WAP and/or LIHEAP services at the local level.

#### Contact:

• Find your local community action agency

#### LIHEAP LOCAL SERVICE PROVIDERS

- Deliver LIHEAP services at the local level.
- Often a community action agency or a county government agency.

#### Contact:

• Find your local LIHEAP provider

#### PUBLIC HOUSING AGENCIES

• Operate federally-subsidized housing properties, administer the Section 8/Housing Choice Voucher program, and manage other affordable housing programs.

#### Contact:

• Find your local public housing agency

#### **RURAL ELECTRIC COOPERATIVES**

- Member-owned electric providers.
- Can borrow from USDA programs to offer clean energy financing to members.

Contact:

• Find your local cooperative

# COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS

- Banks and other institutions committed to providing financial services in underserved communities.
- Certified by the CDFI Fund in the Treasury Department.

#### Contact:

• Find your local CDFI

## Notes

- 1. The final recommendations from the White House Environmental Justice Advisory Council also include increasing REAP's budget and expanding eligibility to tax-exempt entities.
- 2. The White House Environmental Justice Advisory Council similarly recommended providing funding to the DOE for distributed renewable energy programs, with special attention to serving historically disadvantaged communities.
- 3. The White House Environmental Justice Advisory Council also called on the DOE to incentivize community solar projects serving low-income households.
- 4. The final recommendations from the White House Environmental Justice Advisory Council also note the importance of reviewing utility allowance policies and practices.
- 5. The White House Environmental Justice Advisory Council called on Congress to pass many of the solar Investment Tax Credit measures also suggested by the 30 Million Solar Homes coalition.
- 6. The White House Environmental Justice Advisory Council has also recommended the creation of a national green bank, which could support inclusive financing for solar and other clean energy investments in underserved communities.