**STATE OF MINNESOTA**

**PUBLIC UTILITIES COMMISSION**

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April 1, 2016

**In the Matter of the Petition of Northern States**

**Power Company, dba Xcel Energy, for Approval of Docket No. E002/M-13-867**

**its Proposed Community Solar Garden Program**

**COMMENTS IN RESPONSE TO THE COMMISSION'S FEBRUARY 26, 2016 NOTICE BY**

**Fresh Energy, [co-signers]**

Fresh Energy, [co-signers] submit these Comments in response to the Commission's February 26, 2016 Notice. Specifically, we respond to the Commission’s question regarding steps to encourage low-income participation in Xcel Energy’s (“Xcel” or the “Company”) Solar\*Rewards Community (S\*RC) program. This subject has gained increased interest around the country, and we appreciate the Commission’s attention to this topic.

While there is a significant amount of interest among residential customers in the S\*RC program, to date there is little information on garden subscribers, including current low-income customer participation in the program. As more gardens are expected to reach operation in 2016, additional data on the current program’s performance will be available and we will better understand the degree of low-income participation. However, through our research we have identified specific barriers low-income households face in subscribing to community solar that lead us to conclude that program changes should be made to increase low-income customer access.[[1]](#footnote-1) As we will address in these comments, these barriers include not only lack of available upfront funds to subscribe to gardens, but a perceived lack of credit-worthiness by solar garden financers. To address these barriers we propose a set of program modifications for new community solar projects that we believe will increase access to community solar by low-income customers.

To develop these recommendations, our groups met over the last three months to research barriers, analyze national examples of low-income solar programs and solutions, and evaluated potential access solutions. Meeting materials are attached to these comments.

1. **Barriers for Low- and Moderate-Income Households**

The S\*RC program is designed to allow many types of customers to choose distributed solar energy; however, low-income residential customers often lack upfront money to pay for deposits or fees, or credit score necessary to subscribe to many CSG projects, regardless of payment structure (e.g. upfront or pay-as-you-go subscriptions). These barriers impede low-income participation as financers, and in turn solar developers, are deterred from including low-income households in CSG projects.

While the Commission’s February 26, 2016 Notice requested comments regarding low-*income* participation, it is important to note that income is not the only factor restricting many households. From our research with community solar developers, we have learned that many financers consider credit-worthiness to be the primary test for assessing risk in financing CSG projects. Financers are generally using a FICO credit score of 680 as a base in determining which CSG projects are financeable. As of April 2015, 45 percent of Americans have a credit score less than 700.[[2]](#footnote-2) There is a general correlation between income level and credit score; however, one does not necessarily cause the other. Thus, even a higher-income, low-credit score individual could therefore be denied financing for a CSG project.

There is significant interest and research in solar programs around the country on alternative ways to assess the likelihood of solar cost repayment by customers who pay utility bills.[[3]](#footnote-3) For example, the Department of Energy’s Sunshot Initiative recently announced a grant to San Francisco-based kWh Analytics, which will create a database of financial payment history for solar financing contracts to establish better risk-based pricing approaches by financers. Similarly, Boston-based Solstice Initiative has proposed using a subscriber’s utility bill repayment history, rather than credit score, to determine risk in CSG lending. We recognize that the Commission is limited in its ability to control the use of credit scores by third parties to screen potential subscribers, but offer a brief discussion here to aid the Commission in understanding the complexity of the barriers to accessibility in CSG projects.

In addition to the upfront money and credit score challenges, there are additional transaction costs to include both residential and low-income subscribers. The administrative, marketing, and related costs are lower for developers to enroll a few, larger customers in solar gardens than many smaller customers that are likely to move more frequently than larger subscribers like businesses. Depending on the solar garden developer’s business model, these additional costs may reduce the ability of these new companies to seek additional residential, and low-income, customers.

Importantly, there are also non-monetary obstacles to low-income participation in community solar programs, including marketing, education, and outreach. These include language barriers, lack of internet access, and constrained time and resources.[[4]](#footnote-4) All of these factors combine to further hinder accessibility among low-income households.

1. **The Limitations of a Mandated Low-Income “Carve-Out”**

In Minnesota and nationwide, different solutions have been explored to increase low-income participation in shared renewables programs. For example, the Colorado community solar garden program requires that investor-owned utilities set aside 5 percent of each proposed community solar garden for low-income subscribers in order for the garden to qualify for state Renewable Energy Credits (RECs). While the carve-out appears like an administratively simple way to ensure low income participation, it has drawbacks and we do not recommend it here.

The Colorado Community Solar Garden Act directed the Colorado Public Utilities Commission (PUC) to develop program rules to encourage “ownership in community solar gardens by residential retail customers…including low-income customers.” [[5]](#footnote-5) The low-income “carve-out” in Colorado came out of the Colorado PUC’s rulemaking process implementing the program.[[6]](#footnote-6) The Colorado PUC stated in its final rule: “In each plan to acquire renewable energy and RECs from CSGs, the investor owned [utility] shall reserve, to the extent there is demand for such ownership, at least five percent of its renewable energy purchases from new CSGs for eligible low-income CSG subscribers.”[[7]](#footnote-7) Notably, the Colorado PUC did not order a method or process for compliance. As implemented in Colorado, developers are responsible for ensuring compliance with the 5 percent carve-out.

We understand that the effect of this mandated “carve-out” is that developers are essentially giving away CSG subscriptions to low-income customers in order to meet the 5 percent requirement.[[8]](#footnote-8) For example, a representative of SunShare’s Colorado office explained that, because of financers’ reluctance to finance low-income CSG subscribers, SunShare writes off that portion of each garden. Developers may also spread the cost across the other 95 percent of subscribers. Further, financers are resistant to finance any garden that surpasses the 5 percent low-income requirement, even by one one-hundredth of a percent.[[9]](#footnote-9) Thus, the 5 percent low-income “carve-out” has become a ceiling for low-income participation in Colorado’s CSG projects, rather than a floor.

Although the requirement as implemented in Colorado guarantees *s*ome low-income households access to CSGs, it does not encourage developers to include these households in CSG projects because moving above the 5 percent requirement would mean writing off increasingly larger portions of the CSG, quickly making it unfinanceable. As a result, the number of eligible low-income customers greatly exceeds the availability of low-income subscriptions under the 5 percent carve-out. The requirement is seen as the bare minimum and has caused numerous financial issues for solar developers. However, a required carve-out does ensure access for some low-income households, while a higher voluntary target with incentives is not guaranteed to serve a minimum number of low-income subscribers. On the whole, we do not support a mandatory carve-out at this time. As the carve-out is implemented in Colorado, the same program may fail to reasonably allow for the financing and accessibility of CSGs as required by Minnesota Statute.[[10]](#footnote-10)

1. **Proposed Solutions**

In taking steps to encourage broader participation in Xcel’s CSG program, the Commission will need to definewhich customers qualify. Many customers with poor or insufficient credit history but otherwise sound financial standing may be left out of a program rule based on income alone. As discussed above, although there may be correlation, there is not always a causal link income and credit score. Thus, while we offer a proposed definition of “low-income” for the Commission’s consideration, we recommend that the Commission revisit other methods (such as utility bill repayment history) of reaching and defining a larger customer class in the future.

* 1. **Low-income definition**

In order to maximize inclusion of low-income subscribers in CSG projects, a clear definition of “low-income” should be established. Using a clear definition to determine which customers qualify as low-income would provide consistency and clarity for all parties involved in CSG projects.

Programs in other states use a variety of low-income definitions. California’s Single-Family Affordable Solar Homes program, for example, limits eligibility at 80 percent of area median income (AMI),[[11]](#footnote-11) which is also the “low-income” definition used by the U.S. Department of Housing and Urban Development (HUD) for the purposes of Section 8 housing and other means-based programs.[[12]](#footnote-12) In New York, a “low-income” customer is defined as a customer who receives benefits under the state’s Home Energy Assistance Program or a utility-administered low-income discount program.[[13]](#footnote-13) In Colorado, Xcel Energy established that for the purposes of its community solar program, any subscriber that receives services from the Company’s approved organizations (Energy Outreach Colorado, The Atmosphere Conservancy, Colorado LEAP Program, and a Municipal Housing Authority such as the Denver Housing Authority) qualifies under the community solar low-income carve out.[[14]](#footnote-14)

We recommend that the Commission take the following hybrid approach: first, define “low-income” eligibility as households that earn up to 80 percent of area median income (AMI) per year for eligibility in the recommendations we propose below.

The table below lists the HUD income limits of “low-income” for Minnesota in 2015. [[15]](#footnote-15)

|  |  |
| --- | --- |
| **Household Size** | **HUD Low-income (Minnesota FY 2015)** |
| 1 | $ 43,350 |
| 2 | $ 49,550 |
| 3 | $ 55,750 |
| 4 | $ 61,900 |
| 5 | $ 66,850 |
| 6 | $ 71,850 |
| 7 | $ 76,800 |
| 8 | $ 81,750 |

Under this recommendation, each developer would be required to verify a customer’s income and submit a verification form to Xcel Energy, updating this information with Xcel on an annual basis. We understand that Xcel’s process in Colorado uses a similar structure, which would reduce the administrative costs to the utility to implement this recommendation in Minnesota. The Colorado verification form is attached to these comments for informational purposes.

In Colorado, the Xcel-approved third-party organization reviews a subscriber’s completed Consent to Disclose Utility Information,[[16]](#footnote-16) Subscriber Agency Agreement,[[17]](#footnote-17) and Low-Income Verification Form.[[18]](#footnote-18) The organization verifies each subscriber’s income and signs off on the Low-Income Verification Form, and the developer uploads all information to a portal provided by Xcel Energy. Xcel’s portal automatically tracks a customer’s account number and premise number. When a customer marked as low-income for the purposes of the carve-out leaves a CSG project (e.g., by moving addresses), Xcel’s tracking system notifies the developer that the CSG is out of compliance. Xcel uses the same sales force system in both states, and could replicate these Colorado processes in Minnesota.

This process would be best enabled through partnerships with organizations including, but not limited to, community action agencies, low-income service providers, and affordable housing organizations. Developers in Colorado work with partner organizations (such as public entities, community action agencies, or other nonprofit organizations) to identify low-income households. Developers also work to educate partner organizations and potential subscribers on the community solar program. We recommend that the Commission direct Xcel to coordinate with developers and other organizations to identify low-income households and develop marketing and education materials available in multiple languages.

Second, the Commission should allow a customer’s participation in an existing means-based program such as the Energy Assistance Program (EAP) to qualify that customer as “low-income” for the S\*RC program. The Minnesota Department of Commerce administers the EAP within the state, which includes the Weatherization program and home energy cost assistance, and could leverage its current programs and partnerships with community action agencies and service providers to identify low-income CSG subscribers. There are many organizations that are not classified as community action agencies, but provide energy assistance programs and weatherization services. These service providers work across the state, including Minnesota’s tribal territories. The Department of Commerce maintains a list of EAP and weatherization service providers. [[19]](#footnote-19)

* 1. **Target participation level**

There are a couple of examples of low-income participation goals from other community solar or shared renewables programs across the country. Although Colorado’s 5 percent low-income carve-out has resulted in *some* low-income participation in CSG projects, it is considered by many to be too low to truly encourage such participation.[[20]](#footnote-20) On the other hand, New York’s shared renewables program, which has different program requirements and designs than other community solar programs, allows projects that include at least 20 percent subscriptions by customers in utility low-income programs to interconnect in Phase 1 of the program.[[21]](#footnote-21)

In considering the Minnesota community solar program, other states’ programs, and additional research, we recommend that the Commission establish a low-income participation target of 10 percent of total energy produced by a CSG project. This target participation level would be a reasonable initial target, as it is double the low percentage of participation seen in Colorado, and could be increased as the program continues. To assist projects to reach this ambitious target, projects that submit plans to meet or exceed 10 percent low-income participation should be:

1. exempt from the $100 per kW application deposit requirement,
2. exempt from any engineering study fees in the utility interconnection process, and
3. allowed to expand the use of the “back up subscriber” model (described below) beyond the 40 percent subscription cap on a single large subscriber for a limited period of 90 days.

This recommendation achieves two objectives. First, it would eliminate the “ceiling” presented by the Colorado low-income carve-out mandate, instead providing developers with an incentive to serve more low-income customers than a hard requirement that would act as a ceiling instead of a floor, at double the low-income participation level currently seen in Colorado. Developers would be incentivized to reach at least 10 percent low-income participation, rather than strictly serving a base requirement while being discouraged by third-party financers to develop further. Second, the recommendations provide assurances for financers to back these projects by reducing upfront costs and leveraging an institutional subscriber’s financial standing to alleviate the perception of risk.

To be eligible for the above-listed incentives for a particular project, the developer would be required to verify a low-income subscriber’s eligibility using the process described above and maintain at least 10 percent low-income participation throughout the life of the garden.

In order to ensure ongoing compliance, we recommend that in the event that a CSG using the low-income program incentives falls below 10 percent low-income participation for a 90-day period, the Commission could consider a number of compliance tools:

* + 1. gardens out of compliance beyond 90 days could be required to pay back a portion of the waived engineering fees,
    2. the portion of the garden below the 10 percent target level could be credited at the unsubscribed energy rate until the low-income subscription level increases back to 10 percent. For example, a garden receiving the low-income program incentives that has fallen to 7 percent of low-income subscriptions for over 90 days would have 3 percent of the garden’s energy credited at the unsubscribed energy rate. Once the garden’s low-income subscription total increases back to at least 10 percent, the garden would again be credited at the subscriber’s bill credit rate. As with any other subscription change that may trigger an unsubscribed energy payment, developers should clearly state how a subscriber’s agreement with the developer would be impacted in the event the CSG fell below 10 percent participation for over 90 days. The need for clear contract terms in this situation is the same as other changes to the garden or subscription (e.g. moving out of the service territory, violating the 120 percent subscription limit, etc.).

*1) Fee waiver recommendation*

In our conversations with developers, particularly those that have a focus on residential, multi-family, and low-income customer segments, the deposit and interconnection study fees have arisen as a barrier to move these CSG projects forward. Many developers require third-party financing to cover these costs, and as discussed above, financiers view these customer classes are more risky than other potential subscribers like institutional subscribers. These upfront fees make getting low-income targeted projects that much harder to launch. Waiving or reducing these upfront fees will eliminate significant financial barriers, thereby helping low-income-focused projects to move forward in the interconnection process and have more information on the likelihood of project completion to then seek financing for the garden’s construction.

While we see little downside with eliminating the refundable deposit requirement, we understand that eliminating the engineering study fees may be problematic for some parties. We understand that Xcel is charging developers approximately $22,000 for engineering study of 1 MW projects; we assume this fee is lower for smaller projects. As a key party to increasing low-income CSG access, our recommendation asks Xcel (and its ratepayers) to absorb these costs in order to expand access to low-income customers. We are not recommending that gardens applying under these recommendations be exempt from any interconnection upgrade costs required as a condition to interconnect.

*2) “Backup subscriber” model recommendation*

A CSG project model that leverages the financial stability of a large institutional subscriber has emerged as a potential tool to include low-income households. This model, commonly referred to as the “backup subscriber” model, involves a CSG project in which the large institutional subscriber subscribes for less than the maximum subscription amount they are allowed, using the remainder of their allowed subscription capacity to back other subscribers with credit challenges, such as residential and low-income residential subscribers. If another subscriber is unable to fulfill his or her subscription obligation in a given period, the institutional subscriber then increases its subscription, effectively “backing up” that portion of the garden until the subscriber is able to pay or a new subscriber is found. The model can be depicted as follows:

The “backup subscriber” model is particularly effective to address financers’ concerns regarding mass default. Although we do not anticipate any scenario where numerous low-income subscribers would simultaneously exit a CSG project (due to default or otherwise), financers often assume this scenario in perceiving a CSG project’s risk. The presence of an institutional subscriber in a CSG project, paired with the ability to ramp up its subscription in the event of subscriber exit or default, could serve to address financers’ concerns. An example of an institution interested in serving as a backup subscriber is the State of Minnesota.[[22]](#footnote-22)

Under the current program rules, there is little incentive for institutional organizations to serve as backup subscribers. That is because of the current implementation of the 40 percent limit on a single subscriber. Institutional subscribers would have to reduce their subscriptions to back up other subscribers in a way that will meet the credit expectations of garden financers. Though the odds of a large number of low-income customers leaving the garden at the same time are low, we understand that financers evaluate gardens making some of these assumptions. To address this financer need and to encourage widespread adoption of the “backup subscriber” model, we recommend that the Commission allow institutional subscribers engaging in such CSG projects to exceed the 40 percent subscription limit, up to 60 percent of the CSG capacity, for up to 90 days or until the garden again reaches at least 10 percent low-income subscriptions by energy production.

We believe this recommendation helps the program meet the financing and accessibility requirements of the community solar garden statute. In addition, we recommend that backup subscribers with verified backup subscription contracts should be eligible to receive the low income subscriber’s bill credit rate for the portion of the garden they are backfilling during the 90 day period. This will eliminate much of the financing risk of serving low-income customers of gardens using the backup subscriber tool.

Through conversations with Xcel we understand that currently any change in a customer’s subscription size requires a new Subscriber Agency Agreement to be signed by the customer and submitted to the Company. Requiring a new agreement for each time a backup subscriber’s subscription size may change slightly is an administrative burden that can be alleviated to not dissuade backup subscribers. We recommend that the Company work with solar developers to develop one amended Subscriber Agency Agreement form designed for backup subscribers.

1. **Promising solutions that deserve further exploration**
2. On-bill repayment

In our research in low-income access solutions, solar developers and other organizations have described on-bill repayment as a potential mechanism to increase low-income participation. Developers have explained that on-bill repayment would establish an efficient way for a customer to repay his or her CSG costs on an existing utility bill, and would reduce financers’ perceived risks of customer non-payment. We are aware that on-bill repayment has been successfully implemented in other jurisdictions nationwide, and several groups who have signed on to these comments are currently in conversations with Xcel to explore the potential for establishing a program in Minnesota. The Interstate Renewable Energy Council (IREC) discusses on-bill repayment as a potential solution in its recently released report on this topic. [[23]](#footnote-23) The report notes that an on-bill repayment program in New York has allowed residential customers with credit scores as low as 540 to make both energy efficiency and solar investments. An on-bill repayment program could have numerous benefits for low-income customers pursuing both efficiency and solar projects. Though we do not have the details of an on-bill repayment program to propose at this time, we recommend that the Commission consider this solution in the future.

1. Differentiated bill credit rate

We also explored proposing a different bill credit rate for low-income subscribers, higher than the general residential rate. If the rate was designed by knowing the loan loss reserve requirement or risk premium financiers place on projects subscribing individuals with less than 680 credit score, the rate could provide the right financial incentive for projects to seek out low-income subscribers. While we are not in the position to make a recommendation on a specific low-income subscriber adder rate at this time, we recommend that the Commission consider this option if there is little evidence of increase low-income customer access over the next year.

1. Xcel-owned low-income CSGs

As discussed above, there are numerous barriers—financial or otherwise—facing low-income participation in Xcel’s community solar program. While we are optimistic that the above-stated recommendations have potential to benefit low-income customers, as third-party community solar is a new program there are few case studies demonstrating that the recommendations are sufficient to get financers to finance more community solar gardens that can serve low-income customers. Likewise, solar developers are just beginning to build relationships with organizations that serve low-income customers, and the customers themselves.

With these factors in mind, we recommend that the Commission consider directing Xcel to develop a plan for how the Company can develop CSG projects that serve low-income customers. The plan could include Company-owned CSG projects, working with other solar developers, or some combination. We understand that conversations regarding utility involvement to increase low-income participation in CSG projects have occurred in Colorado, and we are very interested in identifying ways to leverage Xcel’s customer knowledge and expertise to serve low-income customers. At a minimum, we recommend that the plan include a target of developing at least 5 MWs of gardens serving low-income customers over the next few years.

All of these options could alleviate the need for the other recommendations if fully developed. Although we do not have this information in the record at this time, we are hopeful that, with more gardens coming online this year and as the financial community becomes more familiar with these projects, the details needed to fully develop these recommendations will be available. We encourage the Commission to consider these options for further exploration.

1. **Recommendations**

Fresh Energy, [co-signers] recommend that the Commission:

1. Establish a definition of “low-income” that includes households earning up to 80 percent of area median income (AMI), with households participating in existing energy assistance income-based programs automatically qualified as “low-income” for the purposes of the CSG program. Further, Xcel should be required to coordinate with developers and approved low-income organizations to develop marketing and education materials for low-income customers.
2. Set a target low-income participation level of 10 percent per garden. For each garden meeting this threshold:
   1. waive the application deposit;
   2. waive any engineering study fees; and
   3. allow backup subscribers in formal backup subscription contracts to temporarily increase their subscription up to 60 percent of the garden for up to 90 days when they backfill low- income subscribers. Backup subscribers with verified backup subscription contracts should be eligible to receive the low income subscriber’s bill credit rate for the portion of the garden they are backfilling during the 90 day period. The Company should develop a new Subscriber Agency Agreement that accommodates changes in the backup subscriber’s total subscription amount over time.

To ensure ongoing compliance, if a garden falls below 10 percent low-income participation for 90 days, the portion of the garden below the 10 percent target level would revert to the unsubscribed energy credited to the developer until low-income participation reaches 10 percent of a garden’s energy production.

In addition, we recommend that the Commission further explore the options discussed above but not expressly included in Recommendations 1 and 2:

* On-bill repayment. On-bill repayment would provide an efficient way for a low-income customer to repay CSG costs on his or her existing utility bill, reducing consumer confusion.
* A differentiated bill credit rate for low-income customers. A differentiated bill credit rate, if properly designed, could provide an incentive for financers to back CSG projects with low-income subscribers.
* Xcel Energy should develop a proposal for how the Company can serve low-income community solar customers. The Company’s existing low-income programs and project development knowledge could effectively serve low-income customers interested in community solar with a well-designed program that considers Company-operated gardens, partnerships with solar developers, or a combination of both.

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1. While the Commission’s notice requested comment on “low-income and minority subscribers in CSGs,” we are aware that “low-income” is often referenced in conjunction with “moderate-income.” Thus, although we use the term “low-income” in these comments, our recommendations address barriers faced by both low- and moderate-income households. We provide a possible definition of low- to moderate-income households in these comments for the Commission to consider. Further, we do not address minority participation specifically, but encourage the Commission to consider these comments with respect to that issue where applicable. [↑](#footnote-ref-1)
2. FICO (August 17, 2015). *April 2015 FICO Score Distribution*. http://www.fico.com/en/blogs/risk-compliance/us-credit-quality-continues-climb-will-level/attachment/april-2015-fico-score-distribution/. [↑](#footnote-ref-2)
3. *See, e.g.,* Interstate Renewable Energy Council (IREC), “Shared Renewable Energy for Low- to Moderate-Income Consumers: Policy Guidelines and Model Provisions,” available at http://www.irecusa.org/publications/shared-renewable-energy-for-low-to-moderate-income-consumers-policy-guidelines-and-model-provisions/. [↑](#footnote-ref-3)
4. IREC, “Shared Renewable Energy for Low- to Moderate-Income Consumers: Policy Guidelines and Model Provisions,” available at http://www.irecusa.org/publications/shared-renewable-energy-for-low-to-moderate-income-consumers-policy-guidelines-and-model-provisions/ [↑](#footnote-ref-4)
5. Colo*.* Rev. Stat. § 40-2-127. [↑](#footnote-ref-5)
6. *Id.* [↑](#footnote-ref-6)
7. 4 CCR 723-3. [↑](#footnote-ref-7)
8. This is documented in a November 2015 report, Analysis of the Fulfillment of the Low-Income Carve-Out for Community Solar Subscriber Organizations, by the Colorado State Energy Office. The report discusses the results of the community solar low-income requirements and notes that there is “room for improvement.” The report is also available at https://www.colorado.gov/pacific/sites/default/files/atoms/files/CEO%20Low-Income%20Community%20Solar%20Report.pdf [↑](#footnote-ref-8)
9. This was discussed with a representative of SunShare’s Colorado office at a meeting in January on this topic (agenda attached). [↑](#footnote-ref-9)
10. Minn. Stat. § 216B.1641. [↑](#footnote-ref-10)
11. Single-Family Affordable Solar Homes (SASH) 2.0 Program Handbook § 4.2.1 (Applicant Eligibility), pp. 7-8, available at www.cpuc.ca.gov/NR/rdonlyres/B68AAA33-3421-41CA-A14B-E652A269B17F/0/SASHProgramHandbook.pdf. [↑](#footnote-ref-11)
12. U.S. Department of Housing and Urban Development, Transmittal of Fiscal Year 1998 Public Housing/Section 8 Income Limits (Jan. 7, 1998), http://www.huduser.gov/portal/datasets/il/fmr98/sect8.html; Low and Moderate Income Definitions under the CDBG Program (Oct. 19, 1984), http://portal.hud.gov/hudportal/HUD?src=/program\_offices/comm\_planning/communitydevelopment/rulesandregs/memoranda/lmidef84 [↑](#footnote-ref-12)
13. N.Y. PSC, Order Establishing a Community Distributed Generation Program and Making Other Findings, 15-E-0082 (July 17, 2015), *available at* http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={76520435-25ED-4B84-8477-6433CE88DA86 [↑](#footnote-ref-13)
14. Solar\*Rewards Community – Guidelines for Low Income Subscribers. https://www.xcelenergy.com/staticfiles/xe/Marketing/Files/CO-SRC-Guidelines-For-Low-Income-Subscribers.pdf [↑](#footnote-ref-14)
15. HUD. <https://www.huduser.gov/portal/datasets/il/il15/State_Incomelimits_Report.pdf>. [↑](#footnote-ref-15)
16. http://www.xcelenergy.com/staticfiles/xe/PDF/Regulatory/CO\_-Billing&Payment-Consent-To-Disclose-Utility-Customer-DataForm-EN%20.pdf [↑](#footnote-ref-16)
17. https://www.xcelenergy.com/staticfiles/xe/Marketing/Files/co-src-Subscriber-Agency-Agreement.pdf [↑](#footnote-ref-17)
18. https://www.xcelenergy.com/staticfiles/xe/Marketing/Files/co-sr-community-Low-Income-Verification-Form.pdf [↑](#footnote-ref-18)
19. *See* https://mn.gov/commerce/consumers/your-home/save-energy-money/low-income-assistance/eap/eap-service-providers.jsp; *see also* http://mn.gov/commerce-stat/other/wap-map.jpg [↑](#footnote-ref-19)
20. Analysis of the Fulfillment of the Low-Income Carve-Out for Community Solar Subscriber Organizations, *available at* https://www.colorado.gov/pacific/sites/default/files/atoms/files/CEO%20Low-Income%20Community%20Solar%20Report.pdf [↑](#footnote-ref-20)
21. N.Y. PSC, Order Establishing a Community Distributed Generation Program and Making Other Findings, 15-E-0082 (July 17, 2015), *available at* http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={76520435-25ED-4B84-8477-6433CE88DA86 [↑](#footnote-ref-21)
22. Solicitation Addendum No. 2 to State of Minnesota Request for Proposal (RFP), “Community Solar Garden Subscriptions for Minnesota State Capitol Complex and Other State Buildings (Nov. 16, 2015), attached. [↑](#footnote-ref-22)
23. IREC, “Shared Renewable Energy for Low- to Moderate-Income Consumers: Policy Guidelines and Model Provisions,” available at http://www.irecusa.org/publications/shared-renewable-energy-for-low-to-moderate-income-consumers-policy-guidelines-and-model-provisions/ [↑](#footnote-ref-23)