



STATE ENERGY OFFICE

Public Comment Opportunity

Informing the Development of Low- to Moderate-Income Solar and Shared Solar Financing Programs in Virginia and Leveraging New Federal Funding Opportunities Through the EPA Greenhouse Gas Reduction Fund Solar for All Competition

May 18, 2023

Virginia Department of Energy is issuing this public comment opportunity to inform the development of low- to moderate-income solar programs in Virginia. We thank you for your interest, time and expertise to participate in this process.

The questions released in this document are optional, and should you or your organization choose to respond, you may address as many or as few questions as applicable. The public comment opportunity will remain open through June 8, 2023.

Disclaimer

This public comment opportunity is issued solely for information and planning purposes and does not constitute a solicitation. Do not submit trade secret, proprietary or confidential information in your response, as any information submitted is subject to disclosure under the Virginia Freedom of Information Act (Va. Code § 2.2-3700 et seq.).

Responses to this public comment opportunity will not be returned. Responses to this comment opportunity are not offers and cannot be accepted by the Commonwealth of Virginia or Virginia Energy to form a binding contract. Respondents are solely responsible for all expenses associated with their response(s).

Purpose:

Virginia Energy is seeking public comments pertaining to development of a statewide low-to-moderate income (LMI) solar program, referred to as 'the Program'. Virginia Energy is seeking feedback from solar energy developers, financing institutions, solar energy installers, community-based organizations, local governments, weatherization assistance providers and any interested parties concerning distributed generation (DG).

The information collected will provide guidance for Virginia Energy in developing the Program and/or applying to the Environmental Protection Agency (“EPA”) Greenhouse Gas Reduction Fund or other federal, state or non-governmental funding opportunities.

[The Greenhouse Gas Reduction Fund](#) (“GGRF”) includes \$7 billion for competitive grants to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies, including distributed technologies on residential rooftops, and to carry out other greenhouse gas emission reduction activities. These funds are available to the EPA to award grants no later than September 30, 2024.

The Program Description:

The goal of the Program is to deliver financial inducements that provide solar energy at the least cost to LMI households, reducing energy bills and contributing to the Commonwealth’s clean energy and economic development goals.

The GGRF requires the Program to serve disadvantaged communities, including lowincome communities in accordance with the federal Justice 40 provisions as defined in the GGRF implementation framework and subsequent application.

Response guidelines and a brief program summary of the minimum requirements are included, followed by questions organized by category.

Response Guidelines:

Responses must be submitted electronically through the [Virginia Town Hall](#) website or emailed to PublicComments@energy.virginia.gov by Thursday, June 8, 2023. Only electronic written responses provided through [Virginia Town Hall](#) and/or emailed to PublicComments@energy.virginia.gov will be accepted. Responses should be no more than 20 pages in length but may include links to other existing reports or program materials for reference. Respondents may answer as many or as few questions as they wish.

Virginia Energy is not obligated to respond to individual submissions or publish publicly a compendium of responses. A response to this public comment opportunity will not be viewed as a binding commitment to develop or pursue the project or ideas discussed.

Any questions for clarification should be submitted to carrie.hearne@energy.virginia.gov, using the subject title: LMI Solar Questions - Organization Name.

Information Requested:

Respondents are requested to provide the following at the start of their response:

A. Respondent Characteristics

1. Respondent name
2. Respondent organization (if applicable)

3. Point of contact's address, phone number, and e-mail address
4. What type of organization do you represent (government, non-profit, solar installer, financier, developer, energy efficiency provider, weatherization provider, etc.), or are you responding as a private citizen?
5. What area or locality do you represent?
6. What role would you or your organization play in any projects conducted through this program?

Respondents may answer as many or as few of the following questions as they wish.

B. Program Affiliate Roles:

1. What types of entities should be directly affiliated with the Virginia-based program to provide this funding opportunity to disadvantaged communities? What should the organization role(s) entail?

C. Behind-the-Meter Solar Program Design and Questions:

1. What eligibility criteria should be considered or required for evaluating residential single family home occupants as potential beneficiaries of the program?
2. What contractor criteria should be required for local system installers of behind-the-meter solar, storage and/or enabling home upgrades?
3. Should energy efficiency or weatherization standards be required prior to solar and/or storage installations? If so, how should energy efficiency be measured, modeled or documented?
4. What is the best way for customers (occupants) to receive 20 percent energy savings while making the best use of public funding?
5. What is the best way for financing arrangements, solar ownership models and/or financial incentives to leverage private capital?
6. How might direct pay and transferability enable monetization of federal tax credits for households who don't have a tax liability? What entities are needed for this to work in Virginia?
7. What barriers exist for providing PPAs and/or solar leases to LMI residents in Virginia? Barriers may include, but are not limited to, access to non-LMI customers, and rate schedule design. Does the added funding through the GGRF overcome these market barriers?

8. Are there non-traditional approaches to underwriting that the Program should use, and if so, what are successful examples of these?

D. Shared Solar, Community Solar or Multi-family Shared Solar:

1. How should program incentives and/or credit enhancements be designed to enable shared solar projects and/or multi-family shared solar projects to provide utility bill savings to subscribers?

E. Overall Program Design:

1. How should the Program ensure utilization of Renewable Energy Certificates (RECs) to increase economic feasibility for the Program and increase savings to the household?
2. What workforce development elements should be considered to ensure disadvantaged communities benefit from this public investment opportunity?
3. How should marketing and outreach activities be designed to reach disadvantaged communities?

F. General Comments

1. Please provide any additional comments or information not covered or requested in the above questions.