Solar for All: Workplan Overview Resource

This workplan development resources outlines the objectives of each workplan section as well as specific items to include based off EPA's application review. This resource is not a comprehensive template or check-list, rather a list of key priorities to assist selected applicants as the develop workplans. This resource will include items/topics/questions that must be identified or clarified and items that should not be included for each required section of the workplan.

Work Plan Section	EPA Work Plan Priorities
Project Outputs, Outcomes, and Linkages to the EPA's Strategic Goals	EPA must require applicants and grantees to adequately describe environmental outputs and outcomes to be achieved under assistance agreements. Outputs and outcomes differ both in their nature and in how they are measured.
	• Outputs: The term "output" means an environmental activity, effort, and/or associated work product related to an environmental goal or objective that will be produced or provided over a period or by a specified date. Outputs may be quantitative or qualitative but must be measurable during the period of performance.
	 Outcomes: Discuss environmental outcomes. The term "outcome" means the result, effect, or consequence that will occur from carrying out an environmental program or activity that relates to an environmental or programmatic goal o objective. Outcomes may be environmental, behavioral, health-related, or programmatic in nature; may be quantitativ or qualitative; and may not necessarily be achievable within the period of performance.
	Work plan priorities:
	 Include all the <i>required</i> outputs and outcomes (listed below), as well as how to measure against those outputs and outcomes. More information will be defined in the reporting requirements/ SFA's terms and conditions Number of households served
	 New generation capacity broken down by residential solar and residential-serving community solar (MW) Estimated GHG emissions reduced and avoided (CO2; CO2e if available) Estimated household savings per household (\$/household) At least one outcome related to workforce development
	Ensure outcomes/outputs tie directly to recipient's original SFA funds.
	Be sure to specify between new and existing solar generation when discussing outputs/outcomes/linkages.

	• If an SFA recipient is leveraging another SFA recipient and work is duplicative between recipients, outputs and outcomes should tie directly to each individual recipient's SFA funding. <i>Clarify which entity will be producing which results to ensure double counting does not occur.</i>
Meaningful Benefits Plan	This program must "enable low-income and disadvantaged communities to deploy or benefit" from solar. This program defines "benefit" as the five meaningful benefits of residential rooftop and residential-serving community solar defined below. EPA will evaluate applications on their vision and ability to maximize the following benefits received by low-income and disadvantaged communities. Meaningful benefits should represent what the selected applicants are expected to deliver.
	Household savings
	• Each work plan should provide details on how the program will deliver a minimum of 20% household savings to all households served under the program.
	20% household savings plan should be outlined for all solar programs including, single family, multifamily, community (multi-family or off-site).
	Plan should include:
	How the recipient will calculate the 20% household benefits
	• How the household savings figures will be calculated and updated throughout the 5-year program.
	• How recipient will ensure 20% household savings is delivered net (i.e., inclusive) of any costs the program beneficiary incurs (e.g., bill credits, indirect non-financial benefits)
	 If recipient cannot clarify how they will calculate this figure now, add "refining household savings calculation" to the timeline and milestones
	 Demonstrate how to program will ensure savings are realized through audit or other mechanisms. If goals are not met in quarterly reports, recipient would need to revisit their approach and modify.
	 Robust strategies for how recipient will ensure that households that don't have individual meters (e.g., multifamily buildings with master meters and/or rental buildings) will receive these benefits.
	 Note: The 20% savings is inclusive of any costs for participating in the program.

Equitable access to solar

- Each work plan should provide robust explanations of how the awardee will ensure the program increases access to solar generation for low-income and disadvantaged communities.
- Plan should include:
 - Provide further information if who the program intends to serve is a more specific subset of the definition of low-income and disadvantaged communities provided in the Notice of Funding Opportunity.
 - How it will increase low-income and disadvantaged households' access to solar through financing products and deployment options and describe how this benefit will be ensured.
 - How does the recipient intend to make sure they are serving those who need it most?
- Discrimination: Under 40 CFR Part 5 and 40 CFR Part 7 recipients may not administer EPA funded participant support
 cost programs in a manner that discriminates on the basis of race, color, national origin, sex, age or disability.
 Despite any statement to the contrary in your original grant application, EPA financial assistance, including funds,
 generally should not be spent, subawarded, or otherwise distributed based solely or partially on race, color, national
 origin, or sex, consistent with federal nondiscrimination and constitutional laws.

Any proposed activities that distribute or appear to distribute EPA financial assistance based on race, color, national origin, or sex may be clarified by EPA's project officer during workplan negotiations. Please refer to the NOFO for GGRF's definition of "low-income and disadvantaged communities," and make sure that your project deploys this definition to prioritize program benefits.

During program implementation, recipients are encouraged to continue to pursue outreach to all communities, including communities of color, to promote equal opportunity and access to the program's information and potential benefits.

- Refer to the National Community Solar Partnership meaningful benefits resources for guidance.
- Note: this requirement can also be met in the Equitable Access and Meaningful Involvement Strategy please add this in only one section.

Resilience benefits:

- Plan should demonstrate how programs will create capacity to deliver power to low-income & disadvantaged households during a grid outage.
- What resilience benefits CAN SFA fund?
 - Solar + Storage
 - If storage will be deployed, the workplan needs to state how much will be deployed (should be either a) percentage of financial assistance deployed on storage, b) the \$ amount deployed on storage or c) the capacity of storage deployed)
 - Note: need to clarify where FA is tracked
 - Storage for medical equipment is allowed.
- What resilience benefits CANNOT be funded through SFA?
 - Stand-alone storage is not allowed.
- Community solar must deliver at least 50% of the power generated from the system by delivering at least 50% of the benefits (e.g., financial savings, renewable energy credits) derived from the power generated by the community solar system to residential customers within the same utility territory as the facility.

Community ownership:

- Plans should demonstrate how programs will facilitate ownership models that allow for low-income & disadvantaged communities and households to own assets.
- Demonstrate if your program will enable community ownership (EPA would like to see the community own the asset)
 - Community ownership may or may not be an option in each specific community served due to regulatory landscapes. If not possible in your jurisdiction or if other barriers exists discuss in the plan.
- Plan for O&M may be covered here or Financial Assistance Strategy
- For community solar owned by utility, confirm that at least 50% of the benefits (e.g., financial savings, renewable energy credits) derived from the power generated by the community solar system will be delivered to residential customers within the same utility territory as the facility.

	• Plans should include how the program intends to limit risk to communities when ownership pathways are offered.
	Workforce development and entrepreneurship:
	Plans should indicate how programs will invest in high-quality jobs & businesses in low-income and disadvantaged communities Illustrate strategies the recipient intends to use to ensure supported projects are supporting good jobs (reference the U.S. Department of Labor and Commerce <u>Good Job Principles</u>).
	 Provide plan for creating high quality, middle-class jobs in the rapidly growing residential-serving distributed solar energy industry that pay family-sustaining wages and include strong labor standards, including benefits, safe working conditions, and the free and fair choice to join or form a union.
	 Describe how the plan is centered on delivering meaningful benefits to low-income and disadvantaged communities where solar energy is being deployed through the creation of high-quality jobs and shared economic opportunity in those communities.
	• How will the selected recipient ensure that workforce development programs interact with the projects they are fundin and how are they making sure graduates from workforce development programs graduate to high-quality jobs.
Financial Assistance Strategy	Describe how you will use Solar for All funds to provide eligible financial assistance, to enable low-income and disadvantaged communities to deploy and benefit from residential rooftop and residential-serving community solar and storage.
	Financial assistance section
	• Specify the percent (%) of the award will be directed towards financial assistance (most recipient should use at least 75% of program funds on financial assistance and should maximize solar deployment funded by this program)
	 You should specify which solar projects the program will provide financial assistance for (i.e., rooftop residential solar and/or residential-serving community solar). If the program will include both project-types, include the anticipated share of funding for each project-type.
	• Describe how the program will complement, and not duplicate, existing subsidies, tax credits, and other sources of financing and support deployment that would not have occurred otherwise. To whom the program will provide financial assistance (i.e., to contractors who install solar, directly to households).
	Note: Do not name specific contractors in the workplan. Proper procurement procedures must be followed for contractors.

•	Include details on what financial products will provide the financial assistance (e.g., loans, subsidies, loan loss reserves, etc.)
•	Discuss any plans for year 1 to refine any financial subsidies with input from industry
•	If the program intends to provide funds directly to a household, does the program understand and have plans to mitigate any increase in taxes and plans to address impacts to reported income and eligibility for other income- qualified programs
	Note: EPA cannot provide tax guidance
•	If recipient is leveraging funds from another SFA recipient:
	 Justify why it is an efficient use of federal funding for two SFA recipients to be involved in the same project and how two SFA recipients on the same project maximizes the number of households that will be served by this program
	Clarify what each party will fund/do exactly
•	For each financial product proposed in the workplan:
	Clarify whether the product is a subaward, participant support cost, or contract
	• Include the specific type of financial product and how the financing/grant will function.
	Include the transaction counterparty (e.g. nonprofits, municipal utility)
	Include the program beneficiary (if different than transaction counterparty)
	Provide the estimated size per project/transaction (\$)
	Include all types of projects financed (rooftop residential solar and/or residential serving community solar)
Revolving	loan funds
•	Clarify if any of the financial assistance has the opportunity to generate program income. If so, the financial assistance is automatically considered a revolving loan fund.

	pgrades
•	Definition from NOFO: Enabling Upgrades - Investments in energy and building infrastructure that are necessary to deploy or maximize the benefits of a residential rooftop and residential-serving community solar project. Enabling upgrades must satisfy all of the following criteria to be an eligible zero-emissions technology: (1) an investment in energy or building infrastructure and (2) necessary to deploy or maximize the benefits (i.e., financial savings or resiliency benefits) of a residential rooftop and residential-serving community solar project as defined above. Enabling upgrades should be used sparingly and only when necessary.
•	The object of the Solar for All program is to deploy solar as efficiently as possible with the dollars available, please ensure enabling upgrades in the plan are critical to solar deployment and seek other funding for electrification wher possible including NCIF and CCIA
•	Enabling upgrades will <u>only be funded in conjunction with a solar investment</u> (i.e., recipients cannot fund electrification or energy efficiency work without also funding solar for the same household).
•	The share of financial assistance expended on enabling upgrades <u>cannot exceed 20% of the financial assistance (not</u> <u>total budget)</u> over the lifetime of the program.
•	Confirm the program has explored other sources of funding for enabling upgrades, especially energy efficiency.
•	Program funds cannot be used to electrify equipment.
•	Panel upgrades are allowed for enabling upgrades.
•	If funding grid capacity upgrades to enable more community solar assets to come online, provide a robust plan to acquire customers in LIDACs to subscribe to the solar deployed.
	• Cannot fund capital upgrades that would be necessary even in the absence of the Solar for All program.
	Include all other strategies pursued to increase hosting capacity (behind the meter solutions).
	• Provide clear justification for hosting capacity upgrade needs to enable solar for all workplan.

Residential-serving community solar

- Clarify how the program's plan to deploy community solar will conform with the definition residential-serving community solar:
 - Delivers at least 50% of the benefits (e.g., financial savings, renewable energy credits) derived from the power generated by the community solar system to residential customers within the same utility territory as the facility
 - Note: Needs to be tracked
 - If funding subscription costs for households to existing solar assets, clarify in outcomes and outputs how much of the community solar generation is for new project deployment, and how much is subsidizing existing generation (these will eventually be different outputs: capacity deployed metric vs clean energy capacity access created for low-income households to benefit)

Grants or participant support costs to utilities or investor-owned utilities:

 If the financial assistance is a subaward: describe how the entities are eligible subrecipients in accordance with <u>EPA's</u> <u>Subaward Policy</u>, and specifically, how that subrecipient will comply with the requirement that a recipient must only receive reimbursement for their actual direct or approved indirect costs such that they do not "profit" from the transaction

Housing affordability

 Provide plans to integrate housing affordability considerations and other unintended consequences of solar development into the program operations, including but not limited to policies that maintain affordability of existing housing stock and policies that prevent rapid cost increases for low-income and disadvantaged households and communities.

Long-term asset operations

• Include a plan to support operations, maintenance, and recycling of the assets funded under the program for the lifetime of the assets (i.e., approximately 20 years), including ensuring maximum energy output of the assets and conducting audits of assets to ensure operations and maintenance is performed

NOTE: make sure plans will conform with EPA's General Terms and Conditions "Automated Standard Application Payments (ASAP) and Proper Payment Draw Down" term and condition.

Project Deployment Technical Assistance Strategy Describe how you will support communities and other solar market stakeholders (e.g., solar developers, contractors, affordable housing developers, owners) with technical assistance to develop project pipeline and deploy solar. Consider what project-deployment technical assistance services are already provided by federal, non-profit, and other market actors to minimize duplication and plan to leverage existing resources.

Technical assistance overview

• Include a statement on percent of the total award that will be directed towards technical assistance

Workforce development

- Demonstrate a plan for developing the necessary workforce to install solar in the geography you propose to serve. In line with the job quality goals discussed in Section 1.2 Meaningful Benefits Plan, training plans should articulate how participants will be trained for and placed in high-quality careers. To meet the labor needs of the rapidly growing solar industry. You should propose workforce training models that prepare individuals from low-income and disadvantaged communities for middle-class career pathways in partnership with workforce partners.
 - Describe how will workforce training opportunities be provided.
 - Provide a strategy to engage with existing training providers, community-based organizations, DOL Workforce Boards, local labor unions, community colleges, and other stakeholders to create an ecosystem that supports an effective job training and placement pipeline for the region.
 - Participant support costs for workforce development
 - Refer to good jobs principles as detailed in <u>Appendix E</u> of the NOFO

Resilient assets

- Include a plan to ensure projects are resilient by inspecting projects to ensure quality control of assets funded under the program.
- Describe any plans to promote adoption of best practices and industry standards for quality installations? These could include certain requirements for contractors to meet to participate in the program
- Include any plans to partner with utilities and create efficiencies for program deployment?
- Include a robust plan for program siting. Plans should address:

Climate hazards
Avoids greenspaces, pollinators etc
Building resistant assets
Agrivoltaics – solar with farmland
• Include any tools that will be used in the program. If not using these tools, is there a reason why?
Example tools:
 SolarApp+ - free, makes permitting easy
SolSmart – streamlines permitting processes in each jurisdiction
Community benefits agreements
 If investing in community solar, include any plans to adopt or encourage <u>community benefits agreements</u> (CBA) during project siting.

Equitable Access and Meaningful Involvement Plan	Describe how your customer acquisition strategy and participatory governance plan will maximize solar deployment across the geography you will serve, ensuring equitable access to and participation in the program. This section of the workplan should also include,
	 Strategies to educate and engage communities on the benefits of solar energy and how your outreach and marketing strategies are culturally appropriate and responsive to the needs of the communities you are proposing to serve.
	 Different engagement strategies to reach different types of communities, including urban, rural, and suburban communities; communities with limited English proficiency; and different types of residential buildings, including single-family, multi-family, and manufactured homes.
	Communities Served
	 Provides type(s) of LIDACs the program will serve
	• If the program is focusing on serving geographically-defined LIDACs, how will the program ensure the program prioritizes serving the most overburdened and low-income households in those locations?
	Applicants outside of the low-income threshold are allowable if within the right geographies
	• If applicable, describe how the program intends to maximize the diversity of communities served by the program, including,
	Rural, suburban, and urban communities
	Traditional energy communities
	Communities with limited English proficiency
	 Households who do not own their property, including owners of manufactured homes on leased sites, and households who do not have space for residential rooftop solar
	 Describe how you plan to prioritize the most disadvantaged and low-income households in the communities the program is designed to serve.
	• Note: There are 4 types of communities, the workplan has to meet at least 1 (three are geographically defined):
	1. Climate and Economic Justice Screening Tool (CEJST) identified as a disadvantaged community

- 2. EJScreen identified disadvantaged communities at or above 90% for any supplemental indices when compared to the nation or state
- 3. Geographically dispersed low-income household at or below 80% area median income and/or 200% Federal poverty level
- 4. Individuals or households approved for a list of named Federal assistance programs with a letter in the last 12 months
- Properties providing affordable housing
 - Multi-family housing with rents not exceeding 30% of 80% AMI for at least half of the residential units with an active affordability covenant from a list of housing programs
 - Naturally occurring affordable housing not exceeding 30% of 80% AMI

Customer acquisition

- If the program intends to serve households that require income verification, demonstrate how you plan to perform robust income verification above and beyond attestation while minimizing burdens on households.
 - Categorical eligibility consists of obtaining proof of household participation in a needs-based Federal, State, Tribal, or utility assistance program with income limits at or below the qualifying income level for the program
- Will other sources of funding be leveraged to acquire customers
- Plan for income verification

Participatory governance

- To ensure equitable access, you should describe how low-income and disadvantaged communities will be involved in program design and operations.
- Describe formalized structures for communities to be involved in the design and decision-making processes of the program.
- Include any plans to engage and work with community-based organizations that reflect the communities the program intends to serve.
- Examples of participatory governance from the EJ Thriving Communities Grantmaker program include:

- A steering committee composed of community-based nonprofit organizations or community members that will help design the grantmaking process, conduct outreach about the financial assistance, propose technical assistance programs, etc.
- An advisory group of community-based organizations and community members who are environmental justice leaders that helps to design the customer outreach and acquisition strategy
- A community-based nonprofit philanthropic organization with community members and community-based organization leaders on its board, involved in the governance of the program and the decision-making about financial assistance
- Commitment to incorporating feedback from communities

Education and Outreach

- Where applicable please note the following topic:
 - Education to the communities as part of the project pipeline
 - Outreach and marketing strategies
 - Using culturally appropriate materials
 - Using diverse channels
 - How groups that already have trust in the community are being engaged
 - Identify participant support costs (catering, childcare, etc)

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Fiscal Stewardship Plan	In the financial stewardship plan section, each workplan should include comprehensive policies and procedures to ensure robust risk management across your activities; prevent fraud, waste, and abuse; and prudently manage grant funds. Additionally, you must explain your plan for consumer protection, including how you will ensure program partners and entities that directly interact, transact, or contract with consumers as part of the program, such as through the sales and marketing of solar products or services, and consumer purchase, leasing and financing (including Property Assessed Clean Energy (PACE) financing), will comply with applicable consumer protection laws.
	Stewardship
	• Policies to reduce fraud, waste, and abuse including formal policies for program oversight, confidential reporting (e.g., whistleblower protections), and managing conflicts of interest
	Subawards
	• If the selected recipient intends to provide subawards, demonstrate strategies for providing oversight over those subawards and ensuring that the subrecipients will only use funds for authorized purposes
	Consumer financial protections
	Plans should demonstrate a strategy to incorporate consumer protection into program operations including,
	 How the program will ensure that all program partners and entities that directly interact, transact, or contract with consumers as part of the program, such as through the sales and marketing of solar products or services, and consumer purchasing, leasing and financing (including Property Assessed Clear Energy (PACE) financing), will comply with applicable consumer protection laws, including the consumer protection laws in the jurisdiction(s) the program will serve, in addition to federal consumer protection and consumer financial laws, such as laws prohibiting unfair, deceptive, and abusive practices.
	• Examples of good policies can be found in Appendix D of the NOFO.
Timeline and Milestones	The workplan should describe how you will plan and implement the Solar for All program, including steps and milestones to implement the strategies and plans described in the Meaningful Benefits Plan, Distributed Solar Market Strategy, the Financial Assistance Strategy, the Project-Deployment Technical Assistance Strategy, and the Equitable Access and Meaningful Involvement Plan. The workplan may also include steps to refine the program plan during a planning period.
	Work Plan Priorities:
	Please include:

	• Tasks
	Grant activity's estimated start and end dates
	Interim milestones
	Deliverables
	Project completion
	 The workplan should contain specific milestones in support of the tasks listed. A milestone schedule covering each yea of the entire project/budget period should be added. Include a breakout of the project's tasks in phases with associate tasks and products/outputs. Include anticipated dates for the start and completion of each task. Provide interim milestone dates for achieving each workplan component as appropriate.
	Include a deadline for delivering a revised workplan after the year 1 planning period
	 Describe any intent to work with diverse group of stakeholders, including industry (e.g., developers), to refin financial assistance assumptions during the program planning period
	• For initial workplan, identify items that will be determined during the planning period
	• Include any plans/or intent to leverage the DOE technical assistance during the 1-year planning period
Budget Narrative	A supplementary budget narrative must be submitted to justify the amounts entered for each category of the budget table the SF-424A. You must explain how the costs associated with each category relate to the implementation of the work plan and the achievement of grant goals. The budget narrative justifies the amounts entered for each category of the budget table. All
	items included in your budget table must be supported in the budget narrative. Refer to EPA's Interim General Budget
	Development Guidance for Applicants and Recipients of EPA Financial Assistance for more information. Specific budget and
	program guidance for the Solar for All Program is included below.
	SFA Specific Budget Information:
	• Subawards to For-Profit Entities: Recipients should specify if any subawards are to for-profit entities and confirm in writing that these will meet the 'subawards to for-profit entities' term and condition. If they do not meet these requirements, they are not an eligible subaward.

- Subawards as Part of Revolving Loan Funds: Recipients should specify which subawards are provided as part of a
 revolving loan fund and will follow the 'I. Subawards as Part of Revolving Loan Funds' term and condition in lieu of those
 specified in the Establishing and Managing Subawards General Term and Condition. The guidelines must be approved by
 the EPA Project Officer prior to drawing down funds.
 - In the budget narrative, or in another document, recipient must provide the following information: (a) describe the activities that will be supported by the subawards; (b) specify the range of funding to be provided through the subawards; (c) identify which types of entities (i.e., governmental, non-profit, for-profit) will receive the subawards; and (d) specify how the subrecipients are eligible subrecipients in accordance with EPA's Subaward Policy. Additionally, if a recipient plans to subaward to a for-profit entity the recipient's response to (d) must specifically describe how the for-profit subrecipient will only receive reimbursement for their actual direct or approved indirect costs such that the subrecipient does not "profit" from the transaction.
- Unnamed Subaward: When the subrecipient is not named in the EPA-approved Solar for All Workplan, the recipient agrees to provide written guidelines that must be approved by the EPA Project Officer. The recipient is precluded from drawing down funds for subawards not named in the application until the EPA Project Officer provides written confirmation of the guidelines. These guidelines must: (a) describe the activities that will be supported by the subawards; (b) specify the range of funding to be provided through the subawards; (c) identify which types of entities (i.e., governmental, non-profit, for-profit) will receive the subawards; and (d) specify how the subrecipients are eligible subrecipients in accordance with EPA's Subaward Policy, and specifically how the subrecipients will comply with the requirement that the subrecipient must only receive reimbursement for their actual direct or approved indirect costs such that they do not "profit" from the transaction
- Participant Support Costs: The recipient is precluded from drawing down funds for participant support costs until the EPA Project Officer provides written confirmation of the guidelines. These guidelines must: (a) describe the activities that will be supported by the participant support costs; (b) specify the range of funding to be provided through the participant support costs; (c) identify which types of entities will have title to equipment (if any) purchased with a rebate or subsidy; (d) establish source documentation requirements (e.g., invoices) for accounting records; and (e) describe purchasing controls to ensure that the amount of the participant support cost is determined in a commercially reasonable manner as required by 2 CFR 200.404.

Please also answer the following questions in addition to the other sections of the budget narrative:

Questions	Responses
Does this scope of work include conducting conferences or workshops?	
Who is initiating the conference/workshop/meeting?	
How is the conference/workshop/meeting being advertised?	
Whose logo will be on the agenda and conference/workshop/meeting materials?	
What is the percentage distribution of persons attending (I.e. % federal govt, public participants, state and local)?	
Will there be proceedings or analysis and will the information be disseminated back to the appropriate (state/local/scientific) community?	
Do you anticipate program income being generated from this conference/workshop/meeting including registration fees?	
Are costs for light refreshments, meals or beverages included in the workplan or budget?	
Will the assistance award result in the development of any copyrighted software or written materials?	
Could an invention result from this project? (If yes, provide disposition instructions)	
Does the project involve animal subjects?	
Does the project involve collecting identical information from 10 or more people?	
Any work outside the US included in the grant?	

Does the grant involve or relate to geospatial information? Includes info identifying geographic location , or application/tools associated with such information – GPS, mapping or statistical data
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Disclaimer: In the event of a conflict between content in this overview document and official statutes, regulations, or EPA guidance, the policies and procedures outlined in official statutes, regulations, and EPA guidance take precedence. Note that this document is being provided to give applicants an opportunity to begin workplan revisions in advance of award. By the time of award, further information will be provided on the workplan development and project scaling.

Keep in mind that there may be updates to this workplan overview in the future. Please make sure to use the most recent version.