Greenhouse Gas Reduction Fund
Solar for All
Rhode Island Equitable Access to Solar Energy (EASE) Programs Work Plan
Project Period: 5/1/24 – 4/30/29
Date of Submittal: October 28, 2024

Project Title: Rhode Island Equitable Access to Solar Energy (EASE) Programs
Grant Number: 84091001
Organization Name: Rhode Island Office of Energy Resources (Lead for Coalition)
Geography: State of Rhode Island
Definition of LIDAC: The RI Coalition will use the Climate and Economic Justice Screening Tool (CEJST) to identify disadvantaged communities (DACs). The State of Rhode Island used GGRF's definition of "geographically dispersed low-income households" from the competition terminology. For metropolitan areas, this includes individuals and households with incomes at or below 80% of the Area Median Income (AMI), or 200% of the Federal Poverty Level, whichever is greater. For non-metropolitan areas, it includes those with incomes at or below 80% of the AMI, 80% of the Statewide Non-Metropolitan Area AMI, or 200% of the Federal Poverty Level.

Programs in Rhode Island that meet these criteria include:

1. Low Income Home Energy Assistance Program (LIHEAP)
   - Eligibility: Households with income at or below 60% of the state median income.

2. Supplemental Nutrition Assistance Program (SNAP)
   - Eligibility: Households with an older adult or someone with a disability may qualify if their income is less than 200% of the Federal Poverty Level (FPL).

Therefore, both LIHEAP and SNAP are capable of verifying and qualifying income eligibility of individuals seeking assistance from SFA programs.

The Rhode Island Coalition will continue to explore additional federal programs that can verify categorical eligibility as avenues for income verification during the 1-year program planning period and will update this section as needed.

Introduction

Section 1: Project Description

1.1 Overview

The Rhode Island coalition of applicants is proposing the launch and expansion of a comprehensive suite of six financial assistance programs and twelve project deployment technical assistance initiatives designed to equitably address barriers to solar adoption in Rhode Island's low-income and disadvantaged communities. All financial assistance programs are tailored to defray specific

and longstanding financial barriers to solar adoption while addressing the needs of low-income renters and homeowners. Financial assistance programs proposed specifically deliver meaningful benefits of reliable solar power directly to RI's most historically underserved communities through low-income and DAC-specific eligibility requirements. The following programs are numbered in the below summary table.

NOTE: Program 1 received approval from EPA to be removed from the application. Programs 2 through 7 were NOT renumbered to account for this change. There is no longer a "program 1" in this workplan.

Rhode Island Financial Assistance Programs		**Residential Solar Program Type**
Program 2	Low-Income Residential Solar Direct Ownership Adder	Rooftop single family
Program 3	Low-Income & DAC Roof and Electrical System Adder	Enabling upgrades
Program 4	Low-Income/DAC Residential Energy Storage Adder	Associated Storage
Program 5	Affordable Housing Solar Supplemental Program (AHSSP)	Multifamily
Program 6	Community Remote Net Metering (CRNM)	Community Solar
Program 7	Community Solar on Preferred Sites	Community Solar

***REF "Adder" Expansions (Programs 2, 3, and 4)*:** Delivers upfront grants for rooftop solar direct ownership, enabling upgrades, and associated storage. Programs 2 and 4 double existing adders for LIDAC residents, while Program 3 is an entirely new adder supporting enabling upgrades by mitigating longstanding barriers to solar adoption in RI's oldest homes. These adders can all be paired with each other and applied directly to total project costs, reducing the burden of upfront investment. Upfront grants that directly reduce total project costs enable LIDAC households to own their own system and build wealth in communities that have historically been underserved by RI's ratepayer funded grant programs.

***Affordable Housing Solar Supplemental Program (Program 5)*:** a milestone-based grant program that delivers meaningful solar benefits to energy efficient multifamily housing for low-income tenants and homeowners. Projects can include new construction as well as deep retrofitted housing.

Community Remote Net Metering (Program 6): a milestone-based grant program that will facilitate the ~20MW statutory expansion of RI's community solar program to a total of 50MW, reducing ratepayer costs for the implementation of CRNM. Meaningful benefits will be delivered to over 2,658 additional customers through low-commitment subscription models.

***Community Solar on Preferred Sites (Program 7)*:** A milestone-based grant program which will further enable funding options for community solar on public "preferred sites", while emphasizing the importance of energy resilience for DAC-serving critical facilities.

1.2 Project Outputs, Outcomes, and Linkage to the U.S. EPA's Strategic Goals

Environmental Results - Outputs and Outcomes:

The following outputs/outcomes are based ONLY on new solar generation.

Table 1: Rhode Island's Output and Outcome Targets for Financial Assistance Programs					
Program name	**Capacity Deployed**	**Households Served**	**Absolute Household Savings**	**Federal Funding per household**	**CO_2 Emissions avoided**
Low-Income Direct Ownership Adder	1.54 MW	271	$13,223,851	$3,688	32,000
Roof and Electrical System Adder	N/A	1,478	N/A	$2,500-$20,000	N/A
Low-income Energy Storage Adder	2.69 MWh	125	$1,292,156	$2,000	4,200
AHSSP (Multifamily)	1.7 MW	693	$9,993,047	$5,339	35,250
CRNM	24.25 MW	2,658	$23,968,299	$11,286	435,077
TOTAL	27.49 MW, 2.69 MWh	5,225	$48,477,353		506,527

Outcomes related to workforce development are detailed on page 10.

Linkage to U.S. EPA's Strategic Goals:
This award supports the following goals and objectives of the FY 2022-2026 EPA Strategic Plan.

- Goal 1: Tackle the Climate Crisis
    - Objective 1.1: Reduce Emissions that Cause Climate Change

Section 2: Project Design Plan

2.1 Activities to be Conducted.

Meaningful Benefit Plan

Low–Income Direct Purchase Adder (Program 2):
Program 2 will provide energy savings, access, and ownership through upfront grant payments. This will enable the adoption of on-site solar for households who wish to procure their own power and offset as much of their electric load as possible. Once installed, behind-the-meter solar adequately sized to historic usage will offset close to 100% of electric demand, resulting in significant bill reductions far beyond the 20% household savings target.

Program 2 Activities to be Completed for the Meaningful Benefits Plan:

1. Activities needed to guarantee 20% savings:
    a. Activities necessary to achieve 20% bill savings are outlined in the financial assistance strategy section on page 12 as guaranteeing minimum savings is a program design and implementation parameter to be finalized during the 1-year program planning period. Once the program is launched, behind-the-meter solar adequately sized to historic usage will offset close to 100% of electric demand, resulting in significant bill reductions far beyond the 20% household savings target.
2. Activities to increase LIDAC Access:
    a. Activities to increase LIDAC access to program 2 are detailed in the Equitable Access and Meaningful Involvement Plan section on page 25.
3. Activities that increase household or grid resilience:
    a. Creation of outreach materials that encourage the braiding of REF adders: namely, promoting program 4 for energy storage in tandem with program 2, as Program 4 can only be utilized with solar plus energy storage installations.
    b. Additional activities that increase household resilience are outlined in the educational and outreach strategies detailed in the Equitable Access and Meaningful Involvement Plan section of this document on page 25.
    c. Launch Program 2 (also listed in FA section): program implementation improves household resilience as BTM solar protects from energy price volatility via net metering direct ownership models.
4. Facilitate ownership models that support wealth building / community ownership.
    a. REF's Minimum Technical Requirements already include robust quality assurance measures through mandatory inspections for systems that receive a grant. Quality assurance inspections help build wealth in communities by raising property values and reducing opportunity for costly maintenance or repairs.
    b. Launch program 2 (also listed in FA section): Directly facilitate wealth building ownership models via program launch.

Roof and Electrical Systems Adder (Program 3):
Program 3 will expand access to solar through upfront grant payments by enabling the adoption of on-site solar for households that cannot afford the upfront costs of roof or electrical panel replacements. When adequately sized to historic usage, low-income direct ownership of PV will offset close to 100% of electric demand, resulting in significant bill reductions far beyond the 20% household savings target.

Program 3 Activities to be Completed for the Meaningful Benefits Plan:

1. Activities needed to guarantee 20% savings: -- N/A
    a. As a program geared specifically towards enabling upgrades, this criterion is not applicable because this program is an "adder" which MUST be paired with the REF direct ownership adder and can be paired with all adders simultaneously. This adder MUST be paired with the direct purchase of a solar system, where the 20% savings are experienced. There is a trade-off between Enabling upgrades serving as

a necessary component to achieve 20% bill savings. This program enables those savings to be achieved via all other REF programs (1-4).

2. Activities to increase LIDAC Access:
    a. Activities to increase LIDAC access to program 3 are detailed in the Equitable Access and Meaningful Involvement Plan section on page 25 as community engagement work accomplishes this deliverable.
3. Activities that increase household or grid resilience:
    a. Activities necessary to increase household and grid resilience are outlined in the financial assistance strategy section on page 12 as increased resiliency is an outcome resulting from program design and implementation parameters, which will be finalized during the 1-year program planning period.
    b. Quality Assurance Activities: Please cross reference activities pertaining to quality assurance inspections in the Equitable Access and Meaningful Involvement Plan section on page 32 as quality assurance (QA) can play a crucial role in building household resilience by ensuring that products, services, and systems are reliable, safe, and effective.
    c. Launch Program 3 (also listed in FA strategy): Electrical component improves household safety and resilience.
4. Facilitate ownership models that support wealth building.
    a. Launch Program 3 (also listed in FA strategy): Program implementation directly facilitates wealth building.
        i. See additional activities pertaining to program launch in the financial assistance strategy on page 12.
    b. REF's Minimum Technical Requirements already include robust quality assurance measures through mandatory inspections for systems that receive a grant. Quality assurance inspections help build wealth in communities by raising property values and reducing opportunity for costly maintenance or repairs.

Low-Income/DAC Energy Storage Adder Expansion (Program 4):
Program 4 will enable the adoption of energy storage paired with on-site solar. By offering energy storage paired with solar to communities with frequent history of outages, the grid resilience benefits delivered directly to disadvantaged households can directly improve the reliability of electric service during major storm events.

Per the REF rules and regulations, the energy storage adder funded through this program MUST be deployed in conjunction with and connected to an eligible residential-serving solar project receiving financial assistance from the program. This is because it is an "adder" program. The storage must be sited on residential LIDAC property in conjunction with the solar system. The specific siting of these resources will be determined as applications are submitted to the REF for PV-paired projects.

Program 4 Activities to be Completed for the Meaningful Benefits Plan:

1. Activities needed to guarantee 20% savings:

    a. Develop strategy for reporting plan to calculate household savings for PV paired storage and methodology to quantify resiliency benefits.
    b. Additional Activities necessary to achieve 20% bill savings are outlined in the financial assistance strategy section on page 12 as guaranteeing minimum savings is a program design and implementation parameter that will be finalized during the 1-year program planning period.
2. Activities to increase LIDAC Access:
    a. Activities to increase LIDAC access for program 4 are detailed in the Equitable Access and Meaningful Involvement Plan section on page 25. Community engagement work accomplishes this deliverable.
3. Activities that increase household or grid resilience:
    a. Explore the feasibility of RI Energy's Connected Solutions Demand Response Program as an alternative revenue source for DACs facing most frequent history of outages.
    b. Meet with Energy Hub (administrators of RI Energy's Demand Response Program, Connected Solutions)
    c. Conduct educational Energy Storage and Resilience 101 listening sessions in census tracts in RI facing most frequent history of outages.
4. Facilitate ownership models that support wealth building / community ownership.
    a. Launch Program 4 (also in FA section): Program implementation directly facilitates wealth building.
        i. See additional activities pertaining to program launch in the financial assistance strategy on page 12.
    b. REF's Minimum Technical Requirements already include robust quality assurance measures through mandatory inspections for systems that receive a grant. Quality assurance inspections help build wealth in communities by raising property values and reducing opportunity for costly maintenance or repairs.

How the program intends to limit risk to communities when ownership pathways are offered:
All 3 REF programs directly support ownership pathways for LIDAC community members. These grant programs limit risk to communities in the following ways:

- Grants and Subsidies: Providing upfront grants, rebates, or subsidies can reduce the financial burden for low-income households, limiting their financial exposure and making it easier to afford solar installations by limiting the risk associated with taking the financial leap for a direct purchase system.
- Financial Literacy and Energy Education: The education and outreach strategy articulated in the Equitable Access and Meaningful Involvement Plan can include education on financial planning, energy savings, and the long-term benefits and responsibilities of solar ownership, helping participants make informed decisions.
- Consumer Protections: Enforcing clear, fair, and transparent contracts, along with dispute resolution mechanisms, can protect low-income consumers from predatory practices.
- Option to Purchase: Participants can be given the option to purchase the system at a reduced cost after a certain period. All of the adder programs with the REF are designed to be for customers who own the solar system.

Affordable Housing Supplemental Solar Program (AHSSP):
At least 50% of the net value of the net metered credits achieved with the addition of solar to affordable housing will be required to benefit low-income tenants. These approaches will include direct reduction or rebates of tenant rents; establishment of increased operating or replacement reserves of the property; provision of free or reduced-cost high-speed internet access for the residents; provision of social service programs, such as job training or financial literacy programs, to the tenants; installation of additional energy-savings programs for the property, and other similar initiatives. Will require developers to identify the benefits they intend to utilize to meet these requirements. This program will be designed during the 1-year program planning period. Additional activities related to program design are included in the Financial Assistance Strategy. These additional activities will also include recognition of unintended consequences such as increased costs to tenants and ensuring that tenants benefit from electricity savings that the building might realize through solar adoption. It will also include ways to provide landlord encouragement to undertake energy efficiency measures before installing solar on the property.

Program 5 Activities to be Completed for the Meaningful Benefits Plan:

1. Activities needed to guarantee 20% savings during 1-year program planning period:
    a. Develop and refine 20% household savings calculation, after EPA releases savings guidance, for tenants who receive financial benefit.
    b. Develop and refine 20% household savings guidance and calculations for "non-financial benefit" tenants, for 20% household savings during the 1-year program planning period.
2. Activities to increase LIDAC Access:
    a. Activities to increase LIDAC access for Program 5 are detailed in the equitable Access and Meaningful Involvement Plan section on page 25.
    b. Additional activities related to program design and implementation can be found in the financial assistance strategy section on page 14.
3. Activities that increase household or grid resilience during 1-year planning period:
    a. Protection from energy price volatility via net metering direct ownership models
    b. Explore the inclusion of CRNM subscriptions for tenants that pay their own electricity bills.
    c. Explore leveraging energy storage programs into AHSSP program design.
    d. OER will explore additional activities necessary to increase household and grid resilience in AHSSP program design.

Community Remote Net Metering (CRNM – Program 6):
Program 6 will require and guarantee that community solar facilities structure their subscription models such that the annual direct bill savings resulting from a subscription is equal to or greater than 20% of the household's electric bill. These subscription models will include no sign-up fees, no cancellation fees, no credit checks, and equitable verification and sign-up processes. Program design for CRNM will take place during the 1-year program planning period, and additional activities related to program design are included in the Financial Assistance Strategy.

Program 6 Activities to be Completed for the Meaningful Benefits Plan:

1. Activities needed to guarantee 20% savings **during 1-year program planning period:**
    a. Incorporate household savings into CRNM program design.
    b. Meet with Rhode Island Energy about CRNM program design.
    c. Develop plan to include LIHEAP funds for community solar in CRNM program design.
2. Activities to increase LIDAC Access **during 1-year program planning period:**
    a. File CRNM docket with public utilities commission and participate in regulatory process.
    b. Facilitate public meetings about community solar education and CRNM Program Design
    c. facilitate educational workshops for low-income customers about regulatory process.
    d. Develop stakeholder plan with Center for Justice for CRNM regulatory proceedings.
    e. Meeting with community solar developers and subscriber management companies about CRNM regulatory filing, current subscription offerings and contract terms
    f. Meeting with DOE Clean Energy Connector team to assess viability of participating as pilot state.
    g. Sign Clean Energy Connector Partnership agreement and submit to DOE.
    h. Formally join DOE on connector project as a pilot state
    i. Facilitate regular meetings with LIHEAP to coordinate RI Participation in connector.
3. Activities that increase household or grid resilience: N/A: since the residential-serving community solar project is not owned or located the property of a LIDAC electric customer, this criterion is non-applicable.

Rhode Island Infrastructure Bank (RIIB) Funding Preferred Sites (Program 7):
Projects funded through RIIB's DAC-focused grant program for Community Solar on Preferred Sites would be a part of the total 20MW expansion of the low-income-focused CRNM program as described above. Via subscription models, meaningful benefits deliver a minimum of 20% household savings threshold by requiring that participating community solar facilities structure their subscription models such that the annual direct bill savings resulting from a subscription is equal to or greater than 20% of the household's electric bill prior to accounting for CRNM bill credits. Funding will be sub awarded to RIIB, who will manage the program and provide technical assistance as discussed in the Project Deployment TA section below) necessary to implement the community solar project. To design the program, the Bank is engaging its financial advisory and underwriting firms to establish program terms and consulting its technical advisors to establish program parameters for energy cost savings. The Bank's activities to establish a grant program will span four months and the Bank estimates the timespan to review applications and make project awards will span eight weeks.

Program 7 Activities to be Completed for the Meaningful Benefits Plan:
1. Activities needed to guarantee 20% savings:
    a. Determine baseline energy cost burden averages with OER and the utility.

    b. Development of Project Summary Form: which will allow applicants to conduct a cost savings analysis with the Bank's technical partner. The Bank's technical partner, in partnership with the utility, will review two years' worth of utility bills to establish baseline energy data from which the savings analysis will be performed.
2. Activities to increase LIDAC Access:
    a. Develop framework for prioritizing applicants located 100% within or that serve 100% of Low Income and Disadvantaged Communities
    b. Facilitate two community information sessions per project with program participants.
    c. RIIB will collect information from program participants tallying community outreach and LIDAC enrollment.
    d. RIIB plans to report continual benefits from program participants including cost savings, number of households located within LIDACs impacted, and annual emissions avoided.
3. Activities that increase household or grid resilience:
    a. RIIB will require participating communities to participate in resilience-focused workshops provided by the Bank at no cost to develop and implement grid and infrastructure resiliency plans.
4. Other activities:
    a. OER will meet with RIIB and their legal team to determine whether RIIB rules and regulations need to be updated to include new technical assistance/grant program.

Investing in Quality Jobs and Businesses (meaningful benefits criteria 5):
The Rhode Island AFL-CIO will leverage their members' expertise and existing partnerships with the Rhode Island Department of Labor and Training (DLT) to identify and establish equitable pathways to the kinds of family-sustaining good-paying clean energy careers illustrated in this application for disadvantaged communities. The Rhode Island AFL-CIO will dedicate staff time and resources to provide technical assistance towards workforce development best practices through registered pre-apprenticeship and apprenticeship utilization, community benefits agreements, project labor agreements, career readiness curriculum, and intake. OER will work with the Rhode Island AFL-CIO to create a work plan and hold regular check-in meetings with staff and stakeholders.

OER will coordinate with RI DLT's Real Jobs Rhode Island (RJRI) platform team to determine which communities will be the primary focus of programming and will then assess which of the members of the CBO advisory committee provide services within those areas.

OER will leverage the longstanding partnership with Building Futures Rhode Island to recruit low-income members of affected communities to participate in training. RJRI and Building Futures will create a pathway to a registered apprenticeship as an electrician for between 150-200 individuals from DACs. It is expected that the specific budget identified, and work proposed by RI DLT through Solar for All will result in 75-100 new electricians.

OER commits to adhering to the US Department of Labor and Commerce Good Job Principles. During the planning year, OER will work with workforce stakeholders on program details and

reporting criteria to ensure that the Building Futures RI program, funded through SFA, will interact with the projects funded by SFA. Additionally, OER will work with the REF, RI Housing and RIIB to ensure the Good Job Principals are included in program design. Adherence to the principles will ensure that Building Futures graduates are able to pursue to high-quality jobs in SFA programs.

Workforce Development Milestones to be Completed for the Meaningful Benefits Plan **During 1-year Planning Period:**

a. Milestone 1: DLT to create workforce participation plan through Real Jobs RI. The design will include how DLT plans to ensure that the RJRI program will align with SFA funded programs and how RJRI program participants will receive high quality jobs at the conclusion of their participation.
b. Milestone 2: OER to develop cadence of meetings with DLT, the RJRI platform team, RIIB, REF, and RI Housing to discuss inclusion of the US Department of Labor and Commerce Good Jobs Principals, develop a plan for tracking workforce participation in SFA funded programs, and design reporting criteria.
c. Milestone 3: OER will coordinate with the RJRI team to determine which communities will be the primary focus of programming, ensure that all identified areas are in the SFA specified locations, and will then assess which of the members of the CBO advisory committee provide services within those areas specific to SFA.
d. Milestone 4: OER/AFL-CIO development of workplan for workforce development for SFA Program Period
e. Milestone 5: OER to complete 2024 Clean Energy Jobs Report
f. Milestone 6: Meet with workforce development partners to discuss timeline and action items for implementation.

Financial Assistance Strategy

The percent of award used for financial assistance is 88% as indicated in the budget. Accounting for the $400,000 of EPA Technical Assistance, the percentage of award goes down to 87%.

Expansion of Renewable Energy Fund (REF) Residential Programs to include LIDAC "Adders" for Solar Direct Purchase, Energy Storage, and Enabling Upgrades:

Commerce RI's Renewable Energy Fund (REF) exists to help expand the role of renewable energy throughout Rhode Island. REF has two long standing grant programs (small and commercial-scale grant programs) which support the installation of net-metered solar on residential and commercial buildings. The REF also has existing adders for energy storage-paired systems and carport solar projects. The **addition of new adders to REF's Residential Programs will be administered by REF, via subawards.**

REF is funded using ratepayer dollars, alternative compliance payments, and RGGI, meaning that grant payments are not given directly to the end user. Installers apply to REF on behalf of a customer, the grant is awarded to the installer, and the installer will then leverage the grant awards to directly reduce the cost of a solar project. The REF requires copies of all contracts between the customer and installer, ensuring that the grant amount is passed through to the

customer. **The consumer protections for this process are incorporated into the Minimum Technical Requirements that applicants must follow in order to receive a grant.**

Once sub awarded, REF will expand their existing adder offerings to include three new LIDAC-specific adders, specifically designed to be added onto the existing market-rate base incentive of .65 cents/watt, up to 7.69kW or $5,000 max incentive amount for non-LIDAC customers. While the base incentive amount may change over the course of the five-year SFA program, the existing REF programs are expected to continue until 2029. The addition of the three adders below will improve opportunities for wealth building by reducing upfront project cost in the following ways:

- Program 2: Adder to the small-scale program for direct ownership for low-income homeowners, providing additional funding to support the upfront cost of a customer owned PV system. While a market rate customer can receive up to $5,000 for a residential project, a LIDAC customer could receive up to $10,000 in reduced project cost for the same solar project.
- Program 3: Adder to the small-scale programs for roof and electrical system upgrades for low-income homeowners and multifamily housing projects
- Program 4: Expansion of the small-scale energy storage adder for low-income solar customers and the commercial scale energy storage adder for multifamily housing. While a market rate customer can receive $2,000 for a residential project, a LIDAC customer could receive an additional $2,000 in funding, totaling $4,000 in reduced project cost for a solar project paired with storage.

Residential Solar Low Income Direct Ownership Adder (program 2):
The adder will double the small-scale incentive for qualifying LI customers by creating an adder of .65/watt for eligible small scale direct purchase customers. Customers will be able to receive a maximum grant amount of $10,000 for system sizes 7.69kW and higher. This adder will help reduce the upfront cost of the solar system, reducing the remaining cost that may be financed. Will cap financing fees for projects utilizing the adder at a fixed percentage that will be determined based on stakeholder input. Will work to streamline the reporting of this data and will not allow a project to utilize this adder if the fee percentage is greater than the final determined financing percentage of the total project cost. Examples of tiered incentive structure provided in the original application are provided in Table 3:

Table 3: Sample System Size Ranges

System Size	Base Incentive	LI Adder	Total
4kW	$ 2,600.00	$ 2,600.00	$ 5,200.00
6kW	$ 3,900.00	$ 3,900.00	$ 7,800.00
7.5kW	$ 4,875.00	$ 4,875.00	$ 9,750.00
8kW	$ 5,000.00	$ 5,000.00	$ 10,000.00

Roof and Electrical System Adder (program 3):
REF will provide adders to the Residential and LIDAC multifamily housing program (specifically, programs 2, 4, and 5 in the application) for knob and tube wiring replacement, electrical panel upgrades, structural upgrades and roof replacement. The current share of financial assistance for enabling upgrades is 13.5%, which is well within the 20% threshold for the lifetime of the program.

OER has done due diligence to explore other sources of funding but enabling upgrades and pre-weatherization barriers have been a longstanding challenge for locating sources of funding to address non-generational assets that are not tied directly to energy savings calculations. OER staff have spoken with program directors, OER's CFO, and other state agencies to explore financial avenues for this funding, and OER believes the opportunity to fund enabling upgrades would not exist without this federal funding. OER remains committed to exploring opportunities to braid funding for enabling upgrades with the funding received from the Inflation Reduction Act's Home Energy Rebate Programs, when awarded. While the timelines for each program are still incongruent, this will be addressed during the 1-year program planning period. The adders may be bundled in any combination if a home needs to address multiple issues. To qualify for any of these adders, a quote from a licensed electrician and/or roofing company must be submitted with the REF solar application. These adders will be a capped if the cost for any of the upgrades is less than the max adder amount. REF will require several application and completion components to ensure the adder funds are appropriately dispersed and to prevent fraud.

Examples of incentive structure provided in the original application are provided below:

Table 4: Roof and Electrical Upgrade Adder, Type vs. Amount

Enabling Upgrade Adder	Maximum Amount
Knob and tube wiring replacement, single family	$ 15,000.00
Knob and tube wiring replacement, triple decker	$ 45,000.00
Electrical Panel upgrade	$ 2,500.00
Structural upgrades and roof replacement	$ 20,000.00

Expansion of Energy Storage Adder (program 4):

Program 4 will provide funding to continue the small-scale energy storage adder for systems paired with solar. REF will offer an additional $2,000 flat rate adder to qualifying low-income customers who wish to pair an energy storage system with either a leased or direct purchase PV system. This will bring the total energy storage incentive for a residential low-income customer to $4,000. The average cost of a battery system that went through the REF in 2023 was $22,036 and it is expected that the additional incentive will reduce the cost of an average RI battery storage system by 18.15%.

REF Small Scale energy storage adders work in conjunction with the Rhode Island Energy (RIE) Connected Solutions program, run through the utility's energy efficiency program. Income-eligible Customers utilizing the low-income energy storage adder will be encouraged to apply through Connected Solutions and utilize the 0% Heat Loan to receive no interest financing, allowing customers to pay back the cost of the battery on their monthly electricity bill. Please reference page 17 under the Energy Storage Incentive Analysis section for additional information on recent changes to the Connected Solutions program.

REF "ADDER" PROGRAM FA ACTIVITIES TO BE COMPLETED FOR PROGRAMS 2, 3 AND 4 (design incentive structure and launch program):

1. Facilitating launch of REF application portal prior to adding programmatic funding
    a. Finalize beta testing for existing REF program "test users."

    b. Meet with REF vendor to discuss changes to portal for the SFA programs.
    c. REF Vendor to make changes to the portal for Programs 2, 3, and 4
    d. REF Vendor to beta test new programs in the portal with "test users"
    e. Finalize portal for new REF programs.
2. Develop and release survey to solar and battery storage RI market participants to gain feedback on rightsizing incentives.
3. Develop REF Adder application forms and integrating application forms into portal design.
4. Determine list of required attachments to be submitted with program applications for programs 2, 3 and 4.
5. Develop REF Adder completion documents and integrate application forms into portal design.
6. Release REF Adder application documents and completion documents for public comment for stakeholder feedback
7. Present program design to solar stakeholders for review and comment
8. Update REF application portal to include capabilities for new SFA "adder" programs.
9. Subaward to REF to launch program 2: LIDAC Direct Ownership Adder
10. Subaward to REF to launch program 3: Roof and Electrical Systems Upgrade Adder
11. Subaward to REF to launch program 4: LIDAC Energy Storage Adder
12. Subaward to REF to update their website with existing program materials and links for new "adder" programs' launch.
13. Incorporate Solar for All funding into REF Annual Report
14. Coordinate with REF to implement program design of Roof and Electrical System Adder Program (program 3)
15. Coordinate with REF to hire a full-time employee responsible for SFA program management.
16. Create internal REF program process for adder intake and completion processing.
17. Develop OER/REF reporting framework to monitor adder funds awarded and expended.
18. Update the REF completion documents and review process for Commerce Accounting and Legal teams.
19. Update REF small scale program guidance document
20. Create new flyers that encourage the braiding of REF Adder programs for best return on investment.
21. Update REF website with new, final program documents and process guide
22. Statutorily extend the expiration date of the REF beyond 2029
23. Update the REF Rules and Regulations

Affordable Housing Solar Supplemental Program (AHSSP – program 5):
OER will provide grant funding through RI Housing to eligible affordable housing developments to offset the cost of net metered solar as well as battery storage systems. Several partners work with RI Housing (including OER, RIE, and their vendor for energy efficiency zero energy programs) which provides funding for the design and construction of net zero housing affordable to low-income tenants and homeowners. Projects can include new construction as well as deep retrofitted housing. To expand the opportunity for more affordable housing to get closer to net zero RI Housing will create this new supplemental solar grant program (the AHSSP), which will be specifically designed to close those financing gaps for installing solar systems on affordable developments. Eligible projects must meet required criteria.

RI Housing worked with the National Housing Trust to develop a report on "Advancing Renewable Energy in Rhode Island Affordable Housing", which was published in March 2024. The report details several policy and programmatic activities RI Housing should consider adopting over the next few years. It also identifies barriers to the utilization of renewable energy in affordable housing, best practices to advance solar adoption, and a robust recommendations section. OER and RI Housing have met multiple times in the last few months to discuss the recommendations in the report and more technical assistance is needed to address the barriers outlined in the report. One of the notable findings from the report was that most stakeholders indicated that a lack of technical assistance and access to information created barriers to deploying renewable energy at affordable housing sites. Specifically, developers identified three technical assistance and education needs:

1. Finding easily accessible information about Rhode Island's renewable energy incentives, including help understanding net metering options.
2. Access to information about Inflation Reduction Act (IRA) resources and support in understanding how resources, especially clean energy tax credits, can be incorporated into project financing.
3. Assistance in designing and deploying solar facilities, including identifying reputable contractors (with experience in the affordable and multifamily sectors).

It will be important for OER and RI Housing to identify a path forward to address these needs and other barriers addressed in the report during the program planning year for development of the AHSSP program.

ASSHP ACTIVITIES TO BE COMPLETED FOR THE FINANCIAL ASSISTANCE STRATEGY During 1-year program planning period (design incentive structure and launch program):

1. Coordinate with RI Housing to finalize and implement program design of AHSSP (program 5)
2. Explore possibility to incorporate technical assistance offerings in ASSHP for solar installations on affordable housing.
3. Explore technical assistance recommendations in HUD Tenant guidance.
4. Determine methodology to braid RI Housing funds with RGGI and SFA funding necessary to implement full scope of ZEOS program redesign.
5. Plan to refine any subsidies with input from industry:
    a. OER and RI Housing to issue Request for Information (RFI) to gain input from industry on tiered incentive structure.
    b. Explore options beyond ZEOS offerings for new construction AND existing building modifications/rehab.
    c. Establish file management system with RI Housing to ensure seamless communication for program design, implementation and reporting.

Community Remote Net Metering (CRNM):

OER will create a milestone-based grant program to community solar projects to reduce ratepayer costs for the implementation of CRNM. On June 24, 2023, SB-684A[1] was signed into law by Governor McKee. This new law, among other provisions, requires the OER to redesign the Community Remote Net Metering (CRNM) program, and mandates that at least 50% of the output from a CRNM project must be allocated to low-income residents or residents living in a disadvantaged or environmental justice community. The redesigned CRNM program would be structured as a 20 MW, program and would cap any new CRNM project to 5MWs or less. CRNM projects, per the law, may only be developed in Rhode Island Energy's distribution network, which covers approximately 98% of Rhode Island electricity customers.

Per the new law, OER must file a program proposal and associated benefit cost analysis with the Rhode Island Public Utilities Commission (PUC), which would then issue a ruling either approving, approving with modifications, or denying the program proposal based in part on the findings of such benefit-cost analysis. More stakeholder input, especially from low-income constituents, will be sought prior to this docket being filed. Low-income participation through participatory governance is an activity to be funded under this grant and was included in the original amount budgeted for community engagement. Please reference the participatory governance section of the Project Deployment Technical Assistance Strategy on page 29 for additional detail about our coalition partner, Center for Justice, and their involvement in LIDAC regulatory inclusion.

OER has experience with low income and CBO stakeholder engagement specific to community solar from prior attempts to expand the CRNM program. Notably, OER was a recipient of technical assistance from the first round of the National Community Solar Partnership. However, that was several years ago and there are likely new stakeholders and CBOs we will need to engage. Many stakeholders do not have experience with the regulatory process, and it will be critical to ensure that they have a voice, both before and during the docket proceeding.

One other important stakeholder group that OER will need to engage are community solar developers and subscriber management companies. Since the existing CRNM program reached capacity four years ago, most, if not all, have left the RI market and are not engaged. A serious effort will be needed to ensure that once additional community solar capacity is available, that developers will be interested in building projects.

Lastly, it is expected that more CRNM projects will be built on existing infrastructure, such as roofs and parking lots rather than greenfield spaces. Municipalities may also be interested in hosting a community solar project on behalf of their residents. OER and other program partners will need to engage buildings owners and municipalities to help identify suitable locations for projects.

It is expected that the CRNM program would function under a subscription-based community solar model, with a third party owning the solar facilities, and recruiting the relevant subscribers. This structure allows for direct bill credit savings that meet or exceed the 20% SFA threshold target based upon the delta between what customers would pay in subscription fees to the CRNM project owner and the retail cost of electric service without a CRNM subscription. When municipalities express interest in hosting a CRNM project on municipal owned property, OER and

[1] S0684A.pdf (rilegislature.gov)

RIIB will provide technical assistance to help them navigate the complexities of the program as well as assistance exploring how to take advantage of Direct Pay opportunities.

CRNM and DOE's Clean Energy Connector: Rhode Island is close to finalizing a partnership with the US Department of Energy (DOE) and National Renewable Energy Laboratories (NREL) as a pilot state for the Clean Energy Connector tool, which allows LIHEAP customers to be connected directly with community solar subscription fees. DOE and NREL are able to take on no more than 5 pilot states in 2025 and OER has been ambitious to sign on as a pilot state. This tool ensures strong consumer protections for community solar from enrollment through the life of the program, safeguarding consumer data, and providing customers with comprehensive and clear communication and disclosures about community solar. The Clean Energy Connector mandates a minimum 20% savings requirement for subscribed households and reduces the burden of income verification through LIHEAP. RI's involvement with the connector will help strengthen the case for LIDAC inclusion and engagement with community solar during the CRNM docket filing and will play an important role in the design of LIDAC inclusion in the CRNM program design. Currently, LIDAC community solar subscribers in RI make up only 5% of the total subscribers in the state utilizing community solar. The enabling legislation that expanded community solar mandates a minimum of 50% LIDAC uptake. The connector serves as a valuable nexus in closing the gap between community solar protections, education, and 20% bill savings.

Rhode Island has only one investor-owned utility that the CRNM law applies to. As a result, any new or existing community solar customers participating in the CRNM program will be able to move almost anywhere in the state, in Rhode Island Energy's territory, and be able to move their subscription with them. As OER continues to work with DOE on the Clean Energy Connector, the process with Rhode Island Energy for moving a CRNM subscription to a different electricity account will be created and published on the Community Solar Marketplace Website. The process for moving will also take into account any LIHEAP or other income eligible discounts the customer may receive at the time they move.

CRNM ACTIVITIES TO BE COMPLETED FOR THE FINANCIAL ASSISTANCE STRATEGY (design incentive structure and launch program):

1. Review program design parameters from neighboring states with enabling legislation to learn best practices for program design.
2. Design milestone-based incentive structure for CRNM
3. Go out for public comment on first draft of CRNM program.
4. Explore avenues to gain input from developer industry on attracting community solar installers back to RI.
5. Engage developers on benefits of DOE Clean Energy Connector
6. File CRNM docket with the PUC and participate in the regulatory process.
    a. Activity 1: Meet with RIE about CRNM program design.
    b. Activity 2: Develop stakeholder plan with Center for Justice for CRNM Regulatory Proceedings
    c. Activity 3: Hold 3 meetings with community solar developers and subscriber management companies about CRNM regulatory filing.

Funding Publicly Owned Community Solar Projects on Preferred Sites (Program 7):
Program 7 will establish a milestone-based grant program managed by the Rhode Island Infrastructure Bank (RIIB) for public entities to install host-owned residential-serving community solar projects on preferred sites. The law defines preferred sites as a location for a renewable energy system that has had prior development, including, but not limited to, landfills, gravel pits and quarries, highway and major road median strips, brownfields, superfund sites, parking lots or sites that are designated appropriate for carports, and all rooftops including, but not limited to, residential, commercial, industrial, and municipal buildings. This is a grant program for public entities supplemented by technical assistance. The sites for these projects may be owned by municipalities and quasi-public agencies.

RIIB will incorporate community buy-in during the siting process since siting community solar projects in underserved urban landscapes may be difficult. To promote this community component wherever possible, RIIB will prioritize community solar projects sited in DACs.

RIIB ACTIVITIES TO BE COMPLETED FOR THE FINANCIAL ASSISTANCE STRATEGY:

1. RIIB will refine planned grant subsidies with a project and solicitation scope, inclusion of technical assistance, and projected disbursement schedules. Additionally, the bank will dedicate staff resources for federal reporting requirements. To compensate for a smaller allocation to the program, the Bank will examine internal unallocated revenues to provide additional financial relief.

Project-Deployment Technical Assistance Strategy

Energy Storage Incentive Analysis:
On June 26th Governor McKee signed the 2024 Energy Storage Act (S-2499A)[2] into law, which created an energy storage target in the state for the first time. The goals are 90 MWs by 2026, 195 MWs by 2028 and 600 MWs by 2033. The law requires OER to work with one of our SFA program partners, RIIB, to develop programs to facilitate energy storage adoption, in addition to the current programs already offered. It also requires the PUC to engage stakeholders to adopt frameworks for both an energy storage tariff and an interconnection tariff for distribution system interconnection battery storage projects.

In 2024, Rhode Island Energy has made progress on educating stakeholders about battery storage interconnection processes including stand-alone batteries and solar with energy storage. In April 2024, OER invited Rhode Island Energy to present at a solar stakeholder meeting to provide education and information about the interconnection process to the RI solar industry. In July 2024, OER began public reporting on the number and location of energy storage projects in RIE's territory.[3] More work will be needed on energy storage reporting in the next six months, including: adding progress towards the goals, adding in additional data from other utilities, and the creation of a more refined definition for small, commercial, and utility scale battery projects.

[2] S2499A.pdf (rilegislature.gov)
[3] https://energy.ri.gov/renewable-energy/ris-clean-energy-portfolio

Earlier this year, RIE removed the Connected Solutions program from the energy efficiency program and included it is its own separate PUC filing under a System Reliability Procurement (SRP) for electric demand response.[4] The Connected Solutions Program offered a generous demand response incentive for customers who installed energy storage batteries and participated in peak load reduction events during the summer months. The proposal reduced the incentive from $400/kW for five years to $225kW for at least three years and $200/kW after five years. Since this was approved by the PUC in June 2024, it will be important for OER and its partners to be responsive to stakeholders about the impacts these changes will do to the current residential battery storage market.

To get a sense of the market's response to these changes, OER and the REF released a survey to residential battery storage installers to determine whether changes needed to be made to the REF's energy storage incentive currently offered to customers installing energy storage and solar projects. Currently the program does not provide incentives for stand-alone energy storage systems not tied with solar PV. There were eleven responses to the survey and all eleven indicated that because the SRP Connected Solutions changes were approved, the REF market rate energy storage incentive would need to increase. The survey also indicated strong support for a stand-alone battery incentive. While SFA funds will not be used to fund a stand-alone battery storage program, it will be important to work on addressing this industry identified need.

Program 4 focuses on the expansion of the existing REF energy storage adder and increasing the incentive amount to LIDAC residential customers. In order for program design to begin, OER and the REF need to undertake an analysis of the current battery storage market in Rhode Island. The analysis will provide three outcomes. The first will help inform OER on changes needed to the current REF energy storage adder incentive and right sizing the SFA energy storage adder. The second outcome will be to help design an energy storage incentive for affordable housing. Lastly, the third outcome is to determine what programmatic and policy changes OER and the REF should make to enhance or add to the existing energy storage program to help achieve the new energy storage goals.

Program 4 will also help with meeting the new energy storage goal included in the recently passed energy storage law. OER met with RIE utility planners at the end of September to discuss the plan for engaging with the PUC on the new energy storage tariff which was opened by the PUC on August 30, 2024.[5] OER also has a consultant (not funded through SFA) for assistance with the new energy storage docket. OER, our consultant, and RIE will work closely together over the next year while this docket is underway to ensure there is a clear path forward for energy storage projects to move forward in the state. The result of the docket process should be a clear and easy to understand process for interconnecting small scale, large scale, and utility scale batteries to the RIE distribution system.

OER will procure a consultant to perform an evaluation of the residential scale energy storage market to determine an appropriate incentive for a battery system paired with solar located on multifamily housing, community resiliency hubs, or public critical facility locations.

[4] https://ripuc.ri.gov/Docket-24-06-EE

[5] https://ripuc.ri.gov/Docket%20No.%2024-34-EL

ACTIVITIES TO BE CONDUCTED TO SUPPORT ENERGY STORGE INCENTIVE ANALYSIS:

1. Work with RIIB and the REF teams to develop a scope of work for the energy storage analysis.
2. OER will procure the energy storage analysis vendor through a competitive solicitation.
3. Complete procurement process and execute contract with the selected vendor.
4. Hold kickoff meeting with energy storage analysis vendor.
5. Complete scope of work with vendor to redesign the existing REF battery storage adder and design the SFA battery storage adder.
6. Conduct stakeholder review and comment opportunity on proposed on draft of final report.
7. Publish final report.
8. Meet with Rhode Island Energy to discuss streamlining the battery storage interconnection process.
9. Attend meetings and participate in the PUC-led stakeholder process to create the interconnection tariff for battery storage projects.
10. Attend meetings and participate in the PUC-led stakeholder process to create an energy storage incentive tariff.
11. Attend energy-storage focused conferences to learn from other states with more advanced energy storage policies.
12. Continue to update the energy storage tracker towards the state goal.

Updates to the RI Community Solar Marketplace:

OER maintains the RI Community Solar Marketplace website which serves as a critical forum for community solar education and stakeholder engagement. There are several updates that must be completed to prepare for the upcoming docket filing, additional stakeholder engagement, development of new FAQs, and updated metrics. The SFA funding will be used to provide the backend site design work and changes to the layout and metrics sections to ensure ease of public accessibility. Funds will also be used to translate sections of the website into other languages as well as training for staff members to make edits such as code changes, layout and formatting as well as content updates.

ACTIVITIES TO BE CONDUCTED TO SUPPORT MARKETPLACE UPDATES:

1. Renewal of contract with website vendor
2. Training full-time staff on back end of website
3. Regular meetings with renewable team staff to formulate website updates.
4. Coordination with developers doing business in the state to update current listings, using list of developers.
5. Update Low- and Moderate-Income (LMI) Customer Inclusion in the CRNM Program Plan section of the marketplace website,
6. Add a new section to the website focused on upcoming docket filing and additional stakeholder engagement.
7. Add section to the website to include community serving solar tour information.

REF portal upgrades for new programs:

REF is currently designing its new software platform funded, in part, through DOE's Scaling up Solar Initiative. This new software platform will significantly improve the efficiency of program management efficiencies, communication between solar installers and REF. Including new adders in the REF's current suite of programs will require portal design and functionality that is not included in the current portal design. SFA funds will be used specifically for the support required to launch all the new REF-related programs proposed in this application.

ACTIVITIES TO BE CONDUCTED TO SUPPORT REF PORTAL UPGRADES during 1-year program planning period:

1. Conduct beta testing portal for functionality and quality control
2. REF to update application portal for new programs.
3. Additional activities related to supporting the launch of the REF portal upgrades is discussed in the financial assistance strategy section on page 12.

REF Income Verification Consultant (5 years):

OER will subaward funding to REF to procure a vendor to provide income verification services. Income verification is necessary to meet the geographic and income threshold requirements for SFA program participation. All vendors that contract with the REF must receive Commerce Rhode Island Board approval. OER will leverage state assistance programs such as LIHEAP and SNAP wherever possible to ensure the reasonableness of costs associated with income verification.

ACTIVITIES TO BE CONDUCTED TO SUPPORT INCOME VERIFICATION CONSULTANT:

1. OER and REF teams to read Income Verification Strategies for Income-Based Solar Programs report published by LBNL (July 2024)
2. Create a list of vendors that do similar work.
3. Draft RFP for income verification consultant
4. Publish the RFP for income verification consultant.
5. Present selected vendor to Commerce Rhode Island Board
6. Contract with vendor and hold kick off meeting.
7. Develop and publish process and procedure for income verification for stakeholder awareness.

Workforce Development:

Climate Jobs Rhode Island (CJRI) is a coalition of more than 30 environmental organizations, labor unions, registered pre-apprenticeship and apprenticeship organizations, career readiness organizations, and community organizations that was established in 2021. While leveraging the expertise of its coalition partners, CJRI has been working with the DLT to forecast the needs of the clean energy workforce of the future and establishing pathways for people from frontline, disadvantaged communities to access family sustaining careers with good wages and benefits in the clean energy workforce. CJRI's collaboration with the DLT and other state agencies includes connecting the policy mechanisms with the right pathways to ensure that decarbonization projects enable the appropriate career pathways for people from disadvantaged communities. CJRI currently has two staff members whose experience and knowledge include an ability to shape climate and workforce policy and programs in ways that ensure program implementation benefits working class people and people from disadvantaged communities. CJRI's coalition members provide expertise that enhance these skills, and the organization will soon add two additional staff

members in the beginning of 2024. SFA funds will NOT be used to support CJRI's administrative costs, including these two additional staff members. One staff person has been hired and the other will be hired in early 2025. The following activities will be funded by and conducted under this grant, with the exception of Activity 3 below:

ACTIVITIES TO BE CONDUCTED TO SUPPORT WORKFORCE DEVELOPMENT:

a. Activity 1: RIDLT to create workforce participation plan through Real Jobs RI
b. Activity 2: OER/AFL-CIO development of workplan for workforce development for SFA Program Period
c. Activity 3: OER to complete 2024 Clean Energy Jobs Report, which will not be funded through SFA.
d. Activity 4: Meet with workforce development partners to determine activities to be completed during 1-year planning period.
e. Engage apprentices and journey workers from environmental justice communities, construction industry stakeholders, and representatives of community organizations.

Translation Services (written and in-person):

OER will procure a vendor to assist with translation services for both written materials and for in-person meetings. This vendor will need to provide staff to provide verbal translation services for languages identified by the community for in-person meetings, which may include stakeholder meetings related to community solar, solar 101s and other educational meetings, public meetings and docket proceedings. The vendor will also need to be able to provide translation of written materials which may include content from the Community Solar Marketplace website, marketing material, sample contracts and disclosures, and other material as needed.

ACTIVITIES TO BE CONDUCTED TO SUPPORT TRANSLATION SERVICES:

1. Post Language Translation RFP to state purchasing website.
2. Complete procurement process with vendor and enter into contract.
3. Kick-off meeting with translation services vendor to identify which events, print publication and digital marketing material will require real-time translation services.
4. **During 1-year planning period:**
    a. Identify contract manager on OER team.
    b. Hold check in meetings with vendor on a regular cadence.
    c. Develop contract management plan to cover entire scope of translation services across federal and non-federal funding sources.
    d. Determine how technical assistance offerings are incorporated into activities associated with chosen vendor.

Renewable Ready Technical Assistance:

OER, RIIB and RIDEM will collaborate on an initiative for municipalities and developers which may include, but is not limited to, the identification of locations subject to determined set of criteria, property owner information, estimates of renewable energy production capacity at the locations, and an estimate and impact study of any utility interconnection costs which may be required to connect the project. RIIB will manage a fund to provide financial assistance to reduce the site preparation and interconnection costs for renewable energy development projects on these

locations. In June 2024, the Rhode Island General Assembly passed SB-2293Aaa[6] which established the Renewable Ready Fund. The Fund, co-managed by OER and RIIB, will provide financial assistance to cover the costs of connecting a renewable energy generation project to the electric distribution system on eligible sites within LIDACs. The activities covered by this Fund include but are not limited to (1) installation of transformers and substations; (2) transmission facilitation; and (3) grid flexibility.

Partnership with Rhode Island Energy

The Renewable Ready law requires close coordination between OER, OER's consultant (not funded through SFA), and Rhode Island Energy on two projects related to siting:

1. The first is the identification of eligible sites. OER has been tasked with the creation of a list of locations in the state that:
    a. Is a current or former contaminated site as determined by the Department of Environmental Protection Management
    b. Is a property or a facility owned and/or managed by the State
    c. Is a rooftop of a public, municipal, or state-owned building
    d. Is a state property adjacent to a highway or major road
    e. Is owned by the electric distribution company and subject to the environmental response fund.

    In addition to the list of locations, OER must also include:
    a. A reasonable estimate of the renewable energy production capacity of the location
    b. Identify the current owner of the property and provide their contact information
    c. Include a reasonable estimate of any utility interconnection costs that would be required to interconnect the project to the existing electricity transmission and distribution system.

    The Renewable Ready fund shall be used to cover the costs of connecting a renewable energy generation project to the electric distribution systems on sites identified by OER and DEM and published on the list of eligible sites, and shall include but not limited to, the following activities:
    a. Installation of transformers and substations;
    b. Transmission facilitation;
    c. Grid flexibility; and
    d. Electrification planning for sites and facilities

Funds shall not be used to conduct any interconnection study or other preliminary work as may be required by the electric distribution company or the public utilities commission.

RIE will determine and, if necessary, ISO-NE for anything over a MW, what upgrades to the distribution system are needed for the project to be interconnected as part of an interconnection feasibility study or an interconnection study. The Renewable Ready Fund will be designed to assist with the costs, identified by RIE through the interconnection study process, of equipment needed to facilitate the project. In the case of SFA projects, the Renewable Ready Fund (funded with SFA funds), will support the necessary upgrades needed to construct the project. Examples may include a transformer upgrade in a LIDAC neighborhood that is already saturated with rooftop

[6] S2293Aaa.pdf (rilegislature.gov)

solar or undergrounding of lines in a LIDAC in order to comply with a municipal solar ordinance requirement for a community solar project.

At this time, the Renewable Ready fund program design has not started and site identification has not begun. Both will be completed during the program planning year. As a result, proposed costs for grid updates are not known at this time. The $450,000 in SFA funding will comprise only a part of the Renewable Ready Fund. Other sources of funding may be added to the fund to support non-SFA projects.

2. The second project is to provide financial assistance to eligible entities to reduce the site preparation and interconnection costs for the renewable energy development project on current or formerly contaminated sites.

Both of these projects will require close coordination with Rhode Island Energy for project site identification, costs related to interconnection and site work associated with project development and permitting with municipalities.

One other project that will require close coordination with Rhode Island Energy includes a recent technical assistance award from DOE to support OER's work related to integrated grid planning (IGP). On August 26, 2024, OER was notified of our deep dive application award to US DOE's State Technical Assistance Program. We are in the project scoping phase with the Regulatory Assistance Project (RAP). This work will continue OER's existing work on integrated grid planning with RAP and Lawrence Berkley National Laboratory (LBNL) on a pilot project with the town of Johnston and Rhode Island Energy. OER notified the distribution planning team at RIE of the award at the end of August and they are interested in continuing our collaboration on IGP work. OER also plans on engaging Rhode Island Statewide Planning in the next phase of IGP as well. IGP is a key component of Rhode Island's SEP IRA funding from DOE, and members of the renewables team at OER will be working on this initiative during the SFA timeframe. The scope of work for the technical assistance is still being developed, however, it is expected that a LIDAC will be included in the next round of IGP and the SFA team will be working closely with the selected Town Planner and RIE's utility distribution planning team on implementation.

Finally, two more projects OER is working with RIE on relate to energy storage. OER is working with the utility on the revised Connected Solutions program design, which is mentioned above in the Meaningful Benefits plan related to battery storage. The other is the recently opened energy storage docket which is mentioned above in the Project Deployment Technical Assistance Strategy under the Energy Storage Analysis vendor section.

ACTIVITIES TO BE CONDUCTED TO SUPPORT RENEWABLE READY TA:

1. Track solar for all's impact on the state's Renewable Portfolio Standard
2. Work with RAP and LBNL to identify a LIDAC that will participate in the next round of IGP.
3. RI general assembly passes renewable energy legislation.
4. During 1-year program planning period, OER/RIIB Design Renewable Ready Program
    a. Engage with RIIB on Renewable Ready program design.

b. Identification of sites qualifying for the Renewable Ready program in LIDACs. Only the sites and projects identified will qualify for SFA funding in the Renewable Ready program.
c. Identify and engage with stakeholders via public meetings to be conducted for program design and feedback.
d. Upon program launch, conduct series of outreach events geared towards Renewable Ready Stakeholder feedback and education.
e. Explore sources of TA from 400k allocation versus external sources (e.g., DOE, SEIN, NCSP, etc.)
f. Establish file management system with RIIB to ensure seamless communication for program design, implementation and reporting.

Community Solar Technical Assistance:
RIIB, working with OER, will design a technical assistance program during the program planning year for municipalities and quasi-public agencies to develop community solar projects on municipally owned property. RIIB will utilize SFA funding to provide municipalities technical assistance by paying for a competitively procured vendor to offer siting development, layout drawings, electrical line diagrams, energy forecast estimates, site assessments and visits, economic analysis and other activities as requested.

As part of the technical assistance program design, OER and RIIB will factor in the recently passed solar siting law which limits greenfield solar development and encourages solar adoption on previously disturbed surfaces (rooftops, parking lots, brownfields, etc.). All new ground mounted projects in the state must comply with DEM's new siting guidelines.[7] All new ground mounted CRNM projects will have to comply with the DEM Core Forest Guidance. Additionally, RIIB and OER will encourage CRNM projects to include best practices related to designing topological pathways for well drained sites, avoidance of projects in wetlands, encouragement of including plantings for pollinators, raising fencing for small animals, and utilizing native species plantings and trees whenever possible.

RIIB and their contractor will aid with development of RFPs and provide proposal evaluation assistance. Economic analysis will also be included through tools such as the National Renewable Energy Laboratory's System Advisor Model (SAM) to ensure that municipalities understand the overall project economics and risk profile, including capital costs, principal and interest payments, incentives such as the newly introduced direct pay provision and available state incentives. Part of a vendor's work may include utilizing RIE's System Data Portal and Heat Maps to determine interconnection feasibility, submit feasibility studies to RIE on behalf of municipalities and assist with study results interpretation for municipalities to make decisions about a particular site's interconnection feasibility.

To promote resilient project plans to DAC-serving critical facilities or resilience hubs, RIIBs technical assistance will include solar plus energy storage proposals to bolster the importance of

[7] https://dem.ri.gov/natural-resources-bureau/agriculture-and-forest-environment/forest-environment/core-forest

system reliability during weather events, enabling projects that receive technical assistance to reach a greater volume of RI's disadvantaged populace by seeking refuge at these facilities. Only solar paired storage projects will be funded with SFA funding, as stand-alone storage is not an allowable use of SFA funds.

To qualify for TA, municipalities must reach directly out to RIIB via email with a specific request to review one or more preferred sites within the municipality for community solar potential. RIIB will evaluate the requests for completeness and approve requests for TA until funding is exhausted. Upon approval, RIIB will serve as the nexus between municipalities and available technical assistance opportunities.

ACTIVITIES TO BE CONDUCTED TO SUPPORT RIIB TECHINCAL ASSISTANCE:

1. Develop Technical Assistance Application for municipalities.
2. Develop outreach strategy for establishing connections with eligible DACs.
3. Develop strategy for Direct Pay technical assistance.
4. Explore Clean Energy Tax Navigator tools by L4GG as a tool to enhance Direct Pay TA offerings.
5. Work with consultant to develop Economic analysis framework, including tools such as the National Renewable Energy Laboratory's System Advisor Model (SAM)
6. Develop strategy for identifying and engaging with communities experiencing frequent history of outages.
7. Review feedback from TA providers and municipal participants to further refine scope of assistance to meet and address specific community needs
8. Create summary of findings from TA workshops that lead to project financing and implementation.

Project Deployment Regulatory Assistance (Center for Justice PDTA):

OER will need to work closely with stakeholders as well as the Public Utilities Commission in order for the CRNM program to move forward. One of the most important stakeholders include LIDAC community members who were not provided an opportunity to voice their opinion in the first CRNM program. These important stakeholders often do not have the funds or ability to participate in the regulatory process as a lawyer is required to intervene. The Center for Justice will provide LIDAC representation at the PUC for the CRNM regulatory process. CIFJ was not identified as a sub awardee in the original application but were factored into the community engagement costs. Additional detail regarding participatory governance is included on page 29 of the Equitable Access and Meaningful Involvement Plan.

ACTIVITIES TO BE CONDUCTED TO SUPPORT REGULATORY ASSISTANCE:

1. Facilitate meeting between OER/Center for Justice to Identify exact funding needed to sub award Center for Justice through SFA. This activity will take place early in the program planning year.
2. See Participatory Governance Activities for additional items.

Equitable Access and Meaningful Involvement Plan

In-kind Technical Assistance Awards

In 2024, OER applied for several technical assistance opportunities through various agencies and groups. Two of our applications, with specific activities related to the SFA workplan, were recently awarded.

Solar Energy Innovation Network (SEIN) Solar Community Assistance for Local Equity (SCALE) Project.[8] Innovation at SCALE is funded by the U.S. Department of Energy and led by the National Renewable Energy Laboratory (NREL) is designed to help communities and institutions find their path to solar in a just and equitable way. Through SCALE, DOE and NREL offers targeted technical and analytical assistance to help communities overcome barriers to solar adoption. NREL requested project applications that could take between three to six months to implement. OER applied in order to be better prepared for the solar public engagement work needed to make significant progress in the SFA program planning year. OER was notified of their selection on July 1, 2024.

OER's proposal was specific to community engagement challenges. Two barriers were identified. The first is getting the attention of the public and community-based organizations. Often their knowledge or background on energy subject matter is limited or nonexistent. There is competition for their time, and we are often fighting for the public's attention. Also, OER needs assistance in answering the question of "why?". The question is twofold, why should people pay attention to the proposed education and marketing campaigns we will be deploying and why should they care about participating. OER anticipates two deliverables from SCALE assistance:

- Deliverable 1 – a schedule of meetings with experts and facilitation assistance for a specific number of public meetings.
- Deliverable 2 – a playbook of lessons learned and action items that can be replicated in Rhode Island for OER to deploy in advance of deploying federal funding.

SEIN SCALE ACTIVITIES TO BE COMPLETED:

Some of the SEIN activities might intersect and overlap with public stakeholder meetings listed below, however specific topics, cadence of meetings, audience and other factors will be determined during future meetings with NREL and during program planning year.

1. OER will receive a Scope of Work from NREL
2. Schedule series of meetings between OER/NREL and other staff assigned to this project and determine which topics should be covered at each meeting.
3. Hold public education meetings referenced in deliverable one with NREL or other assigned professional facilitators.
4. Work with NREL staff to develop playbook referenced in deliverable 2 and determine whether it should be a public facing document or for internal OER use.
5. Finalize and/or publish playbook.

[8] https://www.nrel.gov/solar/market-research-analysis/solar-community-assistance.html

The Just and Clean Energy Future – State Implementation Accelerator Project

The Accelerator program is designed to support states that have been awarded IRA, BIL/IIJA and Justice 40 covered programs that incorporate equity analysis and implementation strategies specifically for LIDACs. The program is led by the Communities First Fund which helps transform how federal, state and local governments invest public dollars in Black, Indigenous, People of Color, and low wealth communities by implementing a relationships-first approach to community driven solutions that centers frontline communities' leadership, innovation and priorities. The project will help stack and leverage key federal programs that invest in a just and clean energy future across various sectors. Rhode Island was selected as part of the accelerator cohort on July 31, 2024.[9] While some of the activities may overlap and intersect with the SEIN SCOPE program, OER plans to keep the deliverables separate and distinct as possible as the Communities First Fund is technical assistance for all federally funded program, of which SFA is one.

JUST AND CLEAN ENERGY FUTURE PROGRAM ACTIVITIES TO BE COMPLETED

1. OER to attend kick off meeting in DC (September 16-17, 2024)
2. Develop a scope of work with the Communities First Fund for activities to be conducted during the project program period.
3. OER to attend regular meetings.
4. Host an in-state meeting with CBOs and program partners on implementation strategies.
5. Implement scope of work

Community Based Organizations (CBOs):

Inclusive and authentic community engagement is vital to creating trust with LIDACs and OER has dedicated a significant amount of time over the past several years to building a reliable network of CBOs including neighborhood associations, environmental advocacy groups, social service providers, and other charitable organizations. This network informs our policy and program work. OER is committed to a process where CBOs define and drive outcomes in order for benefits to flow to the community.

To expand this network, OER will leverage existing relationships with CBOs to introduce new CBOs to the CBO network. OER will also leverage working relationships with municipal sustainability offices, Rhode Island's philanthropic community, and other governmental partners to tap their CBO networks for introductions. This work will result in the development of a robust network of CBOs that can be called into action for their communities.

OER will implement multiple education and outreach methods when engaging with our CBO network including in-person and virtual meetings, mailings, and door-door contact. RI-EASE program partners will assist in these education and outreach efforts.

In addition to working with CBOs, other stakeholders will be consulted during the program planning year and at other times throughout the Solar for All program life. These include solar

[9] https://communitiesfirst.us/accelerator1/

stakeholders. OER maintains a solar stakeholder email list with approximately 650 unique email addresses. Approximately three to four emails per month are sent to this list with various program and policy updates. Additionally, OER and the REF host between three to four solar stakeholder meetings per year. We anticipate the cadence of meetings to increase during Solar for All. OER will solicit industry feedback on program design during the program planning year.

For other stakeholders, in addition to the CBOs and solar industry, OER will attempt to reach a diverse set of stakeholders that include other state agencies, boards and councils, trade associations, workforce groups, colleges and universities, and energy efficiency groups.

OER will hold quarterly calls with CBOs to educate and provide opportunities for feedback and to ensure that program design prioritizes applicants within LIDACs. OER will work with CBOs to develop a framework during the program planning year for prioritization as well as ensuring benefits to tenants and 20% bill savings. The low-commitment savings guarantee offered through community solar subscription models will be promoted via Rhode Island's community focused email listservs. RI Program partners will provide CBOs with appropriate translations for their listservs. Program partners will also distribute hard-copy outreach materials by mail to CEJST identified census tracts with a return address that can be verified by residents. The inclusion of return addresses from state agencies will help to establish trust that the distributor of hard-copy materials is not a scam and can be verified by similar online material.

CBO ACTIVITES TO BE CONDUCTED:

1. Expand upon OER's existing list of CBOs to develop new working relationships.
2. Expand upon OER's existing list of neighborhood associations to develop new working relationships with association staff.
3. Coordinate with environmental non-profits on solar, energy storage, community solar education
4. Engage with municipal sustainability offices on solar, energy storage, community solar education.
5. Coordinate with environmental non-profits on scope of programmatic offerings and CBO engagement
6. Engage with municipal sustainability offices on scope of programmatic offerings.
7. Engage with local neighborhood associations in eligible communities to coordinate educational presentations to community members.
8. Engage with local neighborhood associations in eligible communities to coordinate programmatic presentations to community members.
9. Scheduling a cadence of meetings with community-based organizations on programmatic and technical assistance offerings made available through SFA.
10. Creation of a list of digital content (e.g., webpages, videos, 1-pagers) to be distributed to various CBO and community-focused email listservs.
11. Creation of digital content (e.g., webpages, videos, 1-pagers) to be distributed to various CBO and community-focused email listservs.

12. Develop hard-copy outreach materials for distribution to CBOs, public libraries, and community centers.
13. Explore opportunities with local utilities to include inserts for Income Eligible customers in utility bills for programmatic offerings.
14. Engage with Rhode Island Foundation and present on programmatic offerings.
15. Explore feasibility to develop a SFA campaign strategy for canvassing eligible neighborhoods.
16. Community Action Agency engagement: Host events in eligible communities
17. Meet with DOE staff on low-income clean energy connector and explore eligibility to partner as a pilot state.
18. Conduct regular cadence of meetings with DHS to implement Clean Energy Connector partnership as a pilot state.
19. Engage with DOE connector staff to get a Clean Energy Connector Fellow placed at OER to assist with LIHEAP and DHS engagement to pilot Connector in Rhode Island
20. Onboarding DOE Connector Fellow
21. Engage and empower LIDAC communities to develop an understanding of the link between climate justice and economic justice.

Multilingual Education and Workshops:

OER will provide Solar 101 educational resources and workshops such as one-pagers, tri-fold flyers, educational videos about solar energy (that can be QR coded on one-pagers and distributed), or in-person workshops held after work hours that residents can attend and learn about the benefits of solar energy and how to get involved. Translation services will be offered at in-person workshops. Wrap-around services will be provided, recognizing childcare, transportation vouchers, and compensation for time spent at an event is equally as important. As part of the one-year program planning period, program partners will work with CBOs and other RI agencies currently offering wrap-around services to determine adequate offerings for the communities that are being targeted through these initiatives.

Program partners will focus outreach and educational efforts in RI's most energy burdened census tracts. DAC-focused educational initiative is oriented around how solar can provide meaningful benefits while changing the energy landscape for underserved residents, from both a health and financial perspective. These materials will be made available in multiple languages using translation services.

MULTILINGUAL EDUCATION AND WORKSHOP ACTIVITIES:

1. Create Solar 101 educational resources that can be posted to OER's website, the RI Solar Marketplace, and hard copy. QR coded hard-copy materials to simplify access.
2. Creation of educational videos that can be used on OER website to broadly educate about the benefits solar and the nexus of solar with energy efficiency and electrification.
3. Work with translation services vendor to translate digital content for CBOs (see CBO section above) into culturally appropriate language for eligible communities.

4. Work with translation vendor to translate all materials for distribution into culturally appropriate language necessary to reach target audience.
5. Develop resource pages on OER website and RI Solar Marketplace for educational content.
6. Engage with CBOs to determine adequate offerings for wrap-around services.
7. Engage with CBOs to identify local community meetings that OER can attend and give educational presentations, which include Solar 101 written materials and videos.
8. Work with community libraries in eligible communities to disseminate educational materials.
9. Work with the members of the Rhode Island Community Action Association to disseminate educational materials.

Community-Serving Solar Tours:

Program Partners will hold solar siting conversations in tandem with education about the meaningful benefits of solar. Part of this outreach will include drawing attention to the availability of solar tours offered in the surrounding area. The RI Solar Marketplace website will also be updated to include information about where and when tours are available, with the potential to send email invites to subscribers to that specific project. Community solar tours will be a requirement for any projects funded through SFA.

Community Serving Solar Tour Activities to be completed during 1 year planning period:

1. Create community solar developer and project management company outreach plan aimed at identifying points of contact and establishing meaningful connections with installer industry to engage.
2. Work with communications team to create an event proposal for a series of solar tours. Recognizing the speaking portion will vary based on audience, OER.
3. Create outreach strategy for solar tours.
4. Engage with local school districts to assess opportunity for tours geared towards students, with emphasis on communities that may use CRNM program to install rooftop installations.
5. Engage with Project Green Schools.
6. Engage with Movement Education Outdoors.
7. Engage with environmental non-profits in RI who have experience conducting solar tours, exploring the opportunity to join efforts on prospective tours and learn best practices for administration.
8. Explore electronic tools and resources to provide translation services during solar tours (e.g., Headphones, AI, etc.)
9. Work with translation services providers ahead of solar tours to debrief on appropriate jargon, recognizing highly technical industry language can still pose barriers to understanding without proper preparation.
10. Identify rooftop sites suitable for visitation.

Tribal engagement:

Rhode Island is home to the Narragansett Tribe, the only federally recognized tribe in the state. Over the past few years, OER has made several attempts to contact and engage with the Narragansett Tribe, but the response has been tepid. OER will continue attempting to make meaningful connections with the Narragansett Tribe and ensure inclusivity on our educational and outreach plan if they show such interest. Our strategy will involve using our established networks with CBOs, non-profits, state agencies, and academic institutions to engage with the Narragansett Tribe on the programs available through the RI-EASE initiative. This strategy will be integrated into the outreach strategy during the one-year program planning period.

Tribal Engagement Activities:

1. Locate new points of contact with Tribal council using our existing network of CBOs.
2. Engage with known tribal representatives and Climate Jobs RI.
3. Engage with leadership at the University of Rhode Island to connect with students enrolled in the Narragansett Undergraduate Scholarship Program, which was established for members of the Narragansett Tribe. OER will seek to engage with students interested in environmental or energy-related fields.
4. Explore possibility of co-hosting public engagement event with the Tomaquag Museum, which is operated by a member of the Narragansett Tribe.

Public Stakeholder Meetings:

An engaged stakeholder community will be necessary for the long-term sustainability of the RI-EASE initiative. Stakeholder engagement and regular communication leads to committed community members who support the development of initiatives. OER will develop a robust public engagement strategy to provide opportunities for public comment to inform detailed program design and incorporate feedback on draft program plans.

A key element of OER's strategy will be to embark on a statewide road show where OER staff will hold meetings in public venues to educate and inform stakeholders about the RI-EASE initiative. OER's community engagement team will also leverage relationships with federal and state elected officials to cohost road show events.

Further, OER will take a holistic approach to public engagement collaborating with stakeholders by being inclusive, providing wraparound services such as childcare assistance and transportation vouchers.

STAKEHOLDER MEETING ACTIVITIES:

1. Expand upon OER's existing list of venues to conduct stakeholder meetings, recognizing conference rooms in buildings housed by state agencies is not effective at reaching target audience. OER staff will conduct in-person visits to potential sites while establishing stronger connections with building staff.
    a. Identify venues that are child-care friendly to hold public meetings.
2. Create list of neighborhood associations and points of contact for regular communication and scheduling

3. Develop a robust outreach plan for a SFA "Road Show" across RI, holding meetings at town halls, senior centers, community centers,
4. Explore opportunities to partner with neighborhood associations, CBOs, and with elected officials from the RI General Assembly for Road Show tour.
5. Engage with RI Lt. Governor Sabina Matos on community outreach and engagement efforts, including:
    a. Monthly events in senior centers
    b. Spanish radio station segments – i.e., Poder FM111.0
6. WRAP AROUND SERVICES

    a. Explore possibilities for compensating community members for their time if they attend meetings, such as gift cards, vouchers, etc.

    b. Engage with Rhode Island Public Transportation Authority to buy bus vouchers in bulk.
    c. Go out to bid for childcare services vendor and/or Identify opportunities to partner with organizations that already offer childcare services.

Participatory Governance in Regulatory Proceedings:

R.I. Center for Justice (RICJ) is a non-profit public interest law center that partners with community groups to strengthen existing advocacy and service provision with legal representation and strategy. Through working with existing grassroots organizations as a trusted partner, RICJ will continue to advance the goals of the SFA coalition by representing low-income consumers directly in PUC proceedings and any directly relevant court proceedings. Their assistance will be needed during the CRNM regulatory process.

Participatory Governance Activities during the one-year planning period:

1. Set up kick-off call with Center for Justice
2. Identify stakeholders RICJ will represent during CRNM regulatory process and determine how and when to report out to represented stakeholders.
3. Set up regular cadence of calls with RICJ as OER prepares for CRNM regulatory filing.
4. Coordinate debriefing call with Public Utilities Commission on participatory governance efforts for CRNM filing.

Community Solar Marketplace website:

The RI Solar Marketplace website is Rhode Island's principal platform for community solar education and outreach and will also be used for communications on all initiatives undertaken by RI on community solar and customer inclusion. This website already includes a "Low- and Moderate-Income Customer Inclusion in the CRNM Program Plan" page, which will be significantly expanded upon throughout the one-year program planning period. The website will also be the primary way community solar project details are available to the public, including low-income customers, to learn where projects are located, who the installers is, and if the project is actively seeking new subscribers. Customers can link directly to projects that may be looking to subscribe

customers to learn more and sign up. Additional activities to be included are numerated in the Project Deployment Technical Assistance Strategy.

Community Solar Marketplace Activities:

1. Train additional OER staff on backend of CS marketplace website
2. Create tutorial during 1-year program planning period of how to use the Community Solar Marketplace Website.
3. Explore possibility of using translation services to translate webpage into other languages for non-English speakers.
4. Add definitions on marketplace website for different community solar programs.
5. Add a glossary of terms to the marketplace website
6. Update the "what is community solar?" page.
7. Add educational "Solar 101" videos to RI Solar Marketplace website.
8. After the second program year, add additional community stories as projects are developed and interconnected.
9. Publish a community story on community solar consumer protection.
10. Publish the community solar consumer protection form on the marketplace website.
11. Once the plan for community serving solar tours is developed, create subpage on marketplace website to provide information about purpose of tours and opportunities to participate.

Consumer Protection:

OER and the REF have several consumer protection requirements in place including the REF's Minimum Technical Requirements (MTR) which identifies specific codes projects must be built to, safety parameters, and site requirements that projects must met to qualify for incentives. The MTR is periodically updated as Rhode Island updates electrical and building codes relevant to solar and energy storage as well as industry best practices related to installation. The MTR also includes a total solar resource fraction (TSRF) of .8 or greater in order for a project to receive funding. TSRF is a measure of the actual expected irradiance divided by the total irradiance available to a system with optimal siting characteristics (tilt, azimuth, etc.) Shading losses are incorporated into the TSRF and a low TRSF can be the result of shading, non-ideal orientation, or both. All REF Small and Commercial Scale projects that do not meet the MTR are not eligible to receive funding. The REF and OER will require all SFA funding projects, in association with the Small and Commercial Scale programs and adders, to adhere to the MTR.

The REF currently requires a 100% inspection for all projects that receive funding. Most of these inspections are self-inspections and/or self-verification of compliance. New installers participating with the REF's programs for the first time, delinquent installers, or those not performing well are subject to field inspections. The inspection requirement will continue to be enforced for all REF programs included in SFA. The REF will provide inspection services for projects utilizing the adders funded through SFA.

Program design is still underway for CRNM and AHSSP, however OER plans on requiring inspections for SFA funded projects that go through both programs as well as adherence to MTRs. More detail regarding this will be developed during the program planning year.

The REF currently requires a minimum of a three-year workmanship warranty. In addition, the REF requires submission of the turnkey contract which provides detailed warranty information as well as the expected output of the project during the anticipated lifetime of the project. During the program planning year, OER will work to develop warranty requirements for the CRNM and AHSSP programs in accordance with EPA's General Terms and Conditions.

For the past few years, the RI General Assembly has proposed legislation regarding PV recycling. One example is H5525 from 2021, which required developers to create a stewardship plan to recycle panels at the end of their expected life.[10] Since then, DEM and OER collaborated on the recently passed Solar Decommissioning law which was signed by the Governor on May 26, 2024. This law requires that developers of ground-mounted solar systems submit a plan for decommissioning to be held on file by the municipality and requires DEM, with OER to make publicly available model decommissioning plans.[11] All ground mounted projects using SFA funds must adhere to the solar decommissioning law. Work associated with implementation of the law is currently underway and expected to be in effect by January 1, 2025.

On August 7, 2024, Governor McKee signed the Solar Consumer Protection and Homeowners Bill of Rights Act, which will require solar retailers to register their business and have a roster of all representatives soliciting sales, conduct criminal background checks for all sales representatives, and follow municipal restrictions on door-to-door sales and telemarketing rules. It gives the Department of Business Regulation (DBR) the authority to investigate complaints and impose any administrative penalties. The law also requires OER to develop and implement solar consumer protection disclosure forms. While the REF and REG programs already require these forms, the new law ensures that all residential solar PV customers will use the new forms, regardless of which incentive program is utilized (net metering or REG). The law goes into effect on March 1, 2025.[12] All residential SFA projects will adhere to the new law and utilize the net metering consumer protection disclosure form.

On August 30, 2024, OER submitted a technical assistance application to the National Community Solar Partnership (NCSP) for assistance with developing consumer protections for community solar customers. The Solar Consumer Protection and Homeowners Bill of Rights Act does not cover community solar customers so it will be important to have a plan for consumer protection before OER makes its filing to the PUC to expand the CRNM program. The application to NCSP requested assistance for four specific deliverables:

- Research on community solar disclosure form best practices and lessons learned on states that have implemented them.
- Assistance with developing a community solar consumer protection form.

[10] https://legiscan.com/RI/text/H5525/id/2291764/Rhode_Island-2021-H5525-Introduced.pdf
https://legiscan.com/RI/text/S2808/2024
[12] 2024-S 2801A

- Leading a public comment process and facilitating one public meeting on the draft form
- Developing a reporting process for OER to ensure CRNM customers receive a 20% bill savings or equivalent in order to meet both SFA and the NCSP goals.

OER commits to implementing a community solar consumer protection form for all CRNM customers that utilize SFA funding, whether technical assistance is awarded or not.

OER commits to working with the Attorney General's office and all program partners to track all customer complaints related to projects that are funded through SFA. This will include developing a new procedure for tracking customer complaints, include a shared drive accounting system of all customer complaints by program.

Consumer Protection Activities/Notes to be Included In Workplan Shell:

1. Continue meeting with DBR and the AG's office on the implementation of the Solar Consumer Protection and Homeowners Bill of Rights Act
2. Develop the consumer protection disclosure forms.
3. Solicit stakeholder feedback on the draft disclosure forms.
4. If awarded, work with NCSP to complete the following deliverables by Q2 2025:
    a. Research on community solar disclosure form best practices and lessons learned on states that have implemented them.
    b. Assistance with developing a community solar consumer protection form.
    c. Leading a public comment process and facilitating one public meeting on the draft form
    d. Developing a reporting process for OER to ensure CRNM customers receive a 20% bill savings or equivalent in order to meet both SFA and the NCSP goals.
5. Work with DBR on the development of the solar business registration system and promulgating rules and regulations specific to the Solar Consumer Protection and Homeowners Bill of Rights Act
6. Develop a protocol with DBR and the REF to ensure that only solar companies in good standing can participate in REF programs.
7. OER and program partners will develop a process and procedure for tracking customer complaints.
8. OER will develop a solar consumer protections webpage including links to existing videos and resources about the importance of solar consumer protection.
9. OER will update the existing Rhode Island Residential Guide to Going Solar to include community solar, energy storage, the new consumer protection disclosure forms and other updates related to SFA.

Section 3: Fiscal Stewardship Plan

All Program Partners commits to reducing waste, fraud, and abuse both internally among our agencies by creating plans for audits. This includes including audit fees in the budget which are charged to each federal grant by the RI Office of Auditor General for the allocable costs of performing the State's single audit.

OER, REF and RIIB currently use SharePoint with a multifactor authentication requirement. SharePoint has been in place for all three agencies for the past few years. In fact, collaboration on SFA documents, including this workplan, have been done via SharePoint. Only designated users are allowed to share links to documents. This results in a targeted number of people to have access to documents or specific folders within SharePoint, rather than the entire database. Such measures and the use of SharePoint will continue to take place between OER and our subawardees for reporting. For those subawardees who do not utilize SharePoint themselves, OER will make a folder on our SharePoint site available for reporting with a limited number of authorized users.

Rhode Island also has a grants management software system which will be the platform used for management of subawards. Use of this system will ensure OER can maintain oversight of subawardees and ensure that funds will be used for authorized purposes only.

OER also attempts to limit staff access to personal identification information. When receiving confidential information from RIE, the information comes via email as a password protected, encrypted file.

All State employees are subject to the State's code of ethics.[13] Periodic mandatory training for State employees is required. Additionally, all State employees are subject to the Procurement Statutes and Regulations, which includes a Code of Ethics and Professional Behavior regulation (220-RICR-30-00-3)[14]. These regulations help manage conflicts of interest in the procurement process.

OER and the REF have several consumer protection requirements in place including the REF's Minimum Technical Requirements (MTR) which identifies specific codes projects must be built to, safety parameters, and site requirements that projects must met to qualify for incentives. The MTR is periodically updated as Rhode Island updates electrical and building codes relevant to solar and energy storage. All REF Small and Commercial Scale projects that do not meet the MTR are not eligible to receive funding. The REF/OER will require all SFA funding projects, in association with the Small and Commercial Scale programs and adders, to adhere to the MTG.

The REF currently requires a 100% inspection for all projects that receive funding. Most of these inspections are self-inspections and/or self-verification of compliance. New installers participating with the REF's programs for the first time, delinquent installers, or those not performing well are subject to field inspections. The inspection requirement will continue to be enforced for all REF programs included in SFA. The REF will provide inspection services for projects utilizing the adders funded through SFA.

On August 7, 2024, Governor McKee signed the Solar Consumer Protection and Homeowners Bill of Rights Act, which will require solar retailers to register their business and have a roster of all

[13] https://ethics.ri.gov/media/166/download?language=en
[14] https://rules.sos.ri.gov/regulations/part/220-30-00-3

representatives soliciting sales, conduct criminal background checks for all sales representatives, and follow municipal restrictions on door-to-door sales and telemarketing rules. It gives the Department of Business Regulation (DBR) the authority to investigate complaints and impose any administrative penalties. The law also requires OER to develop and implement solar consumer protection disclosure forms. While the REF and REG programs already require these forms, the new law ensures that all residential solar PV customers will use the new forms, regardless of which incentive program is utilized (net metering or REG). The law goes into effect on March 1, 2025.[15] All residential SFA projects will adhere to the new law and utilize the net metering consumer protection disclosure form.

On August 30, 2024, OER submitted a technical assistance application to the National Community Solar Partnership (NCSP) for assistance with developing consumer protections for community solar customers. The Solar Consumer Protection and Homeowners Bill of Rights Act does not cover community solar customers so it will be important to have a plan for consumer protection before OER makes its filing to the PUC to expand the CRNM program. The application to NCSP requested assistance for our specific deliverables:

- Research on community solar disclosure form best practices and lessons learned on states that have implemented them.
- Assistance with developing a community solar consumer protection form.
- Leading a public comment process and facilitating one public meeting on the draft form
- Developing a reporting process for OER to ensure CRNM customers receive a 20% bill savings or equivalent in order to meet both SFA and the NCSP goals.

OER commits to implementing a community solar consumer protection form for all CRNM customers that utilize SFA funding, whether technical assistance is awarded or not.

OER commits to working with the AG's office and all program partners to track all customer complaints related to projects that are funded through SFA. This will include developing a new procedure for tracking customer complaints, include a shared drive accounting system of all customer complaints by program.

Section 4: Timeline and Milestones

The detailed timeline for RI's 5-year workplan is included as an attachment, **with start and end dates for over 200 tasks**. Each of the activities and associated milestones are listed in their respective sections of this document; namely, the Meaningful Benefits Plan, the Financial Assistance Strategy, the Project-Deployment Technical Assistance Strategy, and the Equitable Access and Meaningful Involvement Plan. Duplicating all of those activities in this section of the document would make it increasingly challenging to edit future iterations of the timeline, as start and end dates for activities may be revised during the 1-year program planning period. OER

[15] 2024-S 2801A

remains committed to tracking the tasks listed in the detailed timeline and will continue to add tasks as necessary during the planning year.

Section 5: Reporting Requirements

As the lead applicant, RI OER is dedicated to tracking and measuring progress towards achieving outputs and outcomes. All Program Partners are aware of reporting requirements and are committed to ensuring timely and accurate reporting. OER has experience with creating dashboards and infographics that intuitively and visually display program data. REF will ensure to report on all funding sources for all projects leveraging SFA and ensure that projects do not dip into multiple programs erroneously. Program Partners have ample experience in analyzing and publicizing program success, data, and evidence.

OER already provide metrics to the National Community Solar Partnership and will continue to update the number and capacity of community solar projects in the state, community solar off. takers, including breakout by rate code to track the low-income participants, and will. include household savings in the future. OER will also include community solar and energy storage metrics in OER's Renewable Energy Portfolio, which reports on quarterly renewable interconnection data at the state-level.

1. Performance Reports
Semi-Annual Report
The recipient agrees to submit semi-annual performance reports electronically to the EPA Project Officer within 30 calendar days after the semi-annual reporting period ends. The semi-annual reporting periods are as follows: July 1 to December 31; January 1 to June 30. If the period of performance begins prior to July 1, 2024, then the first semi-annual reporting period shall cover the first day of the period of performance through December 31, 2024. The semi-annual performance report should cover activities from the preceding two quarters.

Final Report
The recipient agrees to submit a final report in a format conducive for immediate public consumption. The final report must contain detailed narratives describing program performance for the entire period of performance, representing an overall assessment of the recipient's implementation of its EPA-approved Solar for All Workplan, supported with qualitative discussions. and quantitative metrics. Additionally, the recipient should detail its program strategy and plans for performance reporting under the Closeout Agreement. The recipient must include the following broad, non-exhaustive elements in its annual reports:

- Progress towards objectives on key performance metrics over the entire period of performance,
- Summary of key activities completed in the entire period of performance, including case studies across different types of financial assistance and project-deployment technical assistance undertaken to enable low-income and disadvantaged communities to deploy or benefit from zero-emissions technologies,
- Geographic coverage of financial assistance and project-deployment technical assistance deployed in the entire period of performance,

- Descriptions and examples of actions the program took over the entire period of performance to meaningfully involve the communities the program serves in program design and operations,
- Plans for key activities (including current transaction pipeline) to be completed as well as outputs and outcomes to be achieved under the Closeout Agreement.

The recipient agrees to submit the final performance report electronically to the EPA Project Officer no later than 120 calendar days after the end date of the period of performance.

2. Transaction-Level and Project-Level Data

The recipient agrees to submit semi-annual transaction-level and project-level data in accordance with information collection instruments approved through GGRF Accomplishment Reporting (EPA ICR Number 2783.01, OMB Control Number 2090-NEW). The recipient agrees to submit the transaction-level and project-level data electronically to the EPA Project Officer within 30 calendar days after the semi-annual reporting period ends. The semi-annual reporting periods are as follows: July 1 to December 31; January 1 to June 30. The semi-annual transaction-level and project-level reports should cover transactions originated in the preceding two quarters.