

Low-Income Community Solar Subscription Platform

DATE: July 27, 2022

SUBJECT: Request for Information (RFI)

Description

This request for information (RFI) is intended to inform the U.S. Department of Energy (DOE) [Solar Energy Technologies Office](#) (SETO), in partnership with the U.S. Department of Health and Human Services (HHS), on the development of a new platform to identify and make community solar with verified savings more accessible to Low-Income Home Energy Assistance Program (LIHEAP) recipients. SETO is interested in responses from all stakeholders, including:

- Community-based organizations
- Community solar subscription managers and developers
- State and local governments
- Researchers
- LIHEAP implementation organizations
- Organizations representing and serving environmental justice and fossil fuel-transitioning communities
- Groups that work with individuals and organizations with high energy burdens

Background

The [National Community Solar Partnership](#) (NCSP), run by SETO, is a coalition of stakeholders working to expand access to affordable community solar. The DOE defines community solar as any solar project or purchasing program, within a geographic area, in which the benefits of a solar project flow to multiple customers such as individuals, businesses, nonprofits, and other groups.

NCSP has over 1,000 partners who leverage peer networks and technical assistance resources to set goals and overcome barriers to expanding community solar access. NCSP has a [2025 target](#) of powering the equivalent of 5 million American households with community solar, generating \$1 billion in energy bill savings. This target will play a key role in achieving the DOE [Justice40 Initiative](#) goals by supporting electricity bill savings, low-income access, and community ownership of community solar.

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

Throughout 2021, NCSP provided a variety of stakeholder engagement opportunities to identify the most persistent barriers to equitable community solar deployment. Stakeholders—including solar developers, states, and community-based organizations—identified low-income customer acquisition as a major barrier to quickly scaling low-income community solar development. Based on extensive feedback from community solar stakeholders across many industry segments, NCSP is partnering with the U.S. Department of Health and Human Services (HHS) to develop and pilot a digital platform.

The [Low-Income Community Solar Subscription Platform](#) will serve as a digital bridge between LIHEAP recipients who are interested in community solar and vetted community solar providers. This platform will help identify and make community solar with verified savings more assessable to LIHEAP recipients and potentially other low-income households. This Low-Income Community Solar Subscription Platform is specifically intended to enable low-income households to participate in community solar savings. NCSP will work with 3-5 states to pilot the platform. After the pilot stage, additional interested states will be included to support the development and deployment of the platform.

Project Overview

The purpose of the Low-Income Community Solar Subscription Platform is to address critical barriers to community solar adoption by low-income households and enable equitable access to community solar benefits by:

- **Reducing customer acquisition and management costs** of low-income household subscribers by connecting community solar developers and managers to a pre-qualified pool of potential subscribers through LIHEAP, therefore, reducing qualification costs.
- **Lowering electricity bills and decreasing energy burdens** for LIHEAP-eligible households through pre-qualifying community solar subscriptions that lower their energy bill costs in a safe, secure manner that protects personally identifiable information.
- **Building investor confidence in low-income community solar programs** by minimizing the perceived credit risk of low-income subscribers and facilitating access to low-cost financing for the development of low-income community solar installations.
- **Expanding the community solar market** to reach its multi-gigawatt potential and speeding equitable clean energy deployment by facilitating the development of low-income community solar installations.
- **Creating clean energy jobs** in solar system project development, operations, and maintenance through the expansion of low-income community solar development.

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

Purpose

The purpose of this RFI is to solicit feedback to better understand how SETO can develop a new platform to identify and make community solar with verified savings more accessible to LIHEAP recipients and potentially other low-income households. SETO will use the feedback from this RFI to inform the design of the platform so that it best meets the needs of relevant stakeholders and achieves the greatest impact for low-income community solar access and bill savings. This is solely a request for information and not a Funding Opportunity Announcement (FOA). EERE is not accepting applications.

Disclaimer and Important Notes

This RFI is not a funding opportunity announcement (FOA); therefore, the Office of Energy Efficiency and Renewable Energy (EERE) is not accepting applications at this time. EERE may issue a FOA in the future based on or related to the content and responses to this RFI; however, EERE may also elect not to issue a FOA. There is no guarantee that a FOA will be issued as a result of this RFI. Responding to this RFI does not provide any advantage or disadvantage to potential applicants if EERE chooses to issue a FOA regarding the subject matter. Final details, including the anticipated award size, quantity, and timing of EERE funded awards, will be subject to Congressional appropriations and direction.

Any information obtained as a result of this RFI is intended to be used by the Government on a non-attribution basis for planning and strategy development; this RFI does not constitute a formal solicitation for proposals or abstracts. Your response to this notice will be treated as information only. EERE will review and consider all responses in its formulation of program strategies for the identified materials of interest that are the subject of this request. EERE will not provide reimbursement for costs incurred in responding to this RFI. Respondents are advised that EERE is under no obligation to acknowledge receipt of the information received or provide feedback to respondents with respect to any information submitted under this RFI. Responses to this RFI do not bind EERE to any further actions related to this topic.

Confidential Business Information

Pursuant to 10 CFR 1004.11, any person submitting information that he or she believes to be confidential and exempt by law from public disclosure should submit via email, postal mail, or hand delivery two well-marked copies: one copy of the document marked “confidential” including all the information believed to be confidential, and one copy of the document marked “non-confidential” with the information believed to be confidential deleted. Submit these documents via email or on a CD, if feasible. DOE will make its own determination about the confidential status of the information and treat it according to its determination.

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

Evaluation and Administration by Federal and Non-Federal Personnel

Federal employees are subject to the non-disclosure requirements of a criminal statute, the Trade Secrets Act, 18 USC 1905. The Government may seek the advice of qualified non-Federal personnel. The Government may also use non-Federal personnel to conduct routine, nondiscretionary administrative activities. The respondents, by submitting their response, consent to EERE providing their response to non-Federal parties. Non-Federal parties given access to responses must be subject to an appropriate obligation of confidentiality prior to being given the access. Submissions may be reviewed by support contractors and private consultants.

Request for Information Categories and Questions

SETO welcomes responses to the following categories and questions related to the development of the Low-Income Community Solar Subscription platform. SETO is seeking feedback on design considerations for the platform, data that needs to be collected, roles of LIHEAP administrators and subscription managers, long-term management of the platform, and limitations on access to the platform. **Respondents do not need to answer all questions to submit a response to this RFI.**

Category 1: Low-Income Community Solar Subscription Platform Considerations

1. Which stakeholders should support the development and implementation of the platform?
 - a. If we held a series of workshops to provide input on the platform, what types of organizations should be invited?
2. How should LIHEAP administrators, LIHEAP subgrantees, income-qualified households, the federal government, subscription managers, and/or developers have access to and use the platform?
3. Who should own and manage this Low-Income Community Solar Subscription Platform in the long-term? (DOE will set up this program but does not anticipate it will ultimately own or manage it)
4. How do we ensure all community solar program structures and projects can connect with the LIHEAP recipients through this platform?
5. This platform is designed to connect LIHEAP recipients with qualified local community solar subscriptions. Does your state have policy or regulatory constraints, conditions, or challenges that would prevent the state from helping to populate the platform with LIHEAP recipients who have expressed interest in learning about available community solar subscriptions?

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

-
6. Does this platform address existing barriers to low-income customer acquisition and management? If so, how? Or if not, why not? What else should DOE consider?

Category 2: LIHEAP Program Considerations

1. This platform is designed to connect LIHEAP recipients with qualified local community solar subscriptions. What is the bare minimum data the platform needs to collect from LIHEAP recipients who express interest in participating in a community solar program so the platform can provide an easy and quality experience for those offering community solar subscriptions as well as potential community solar subscribers?
 - a. What is the appropriate mechanism to confirm customer opt-in?
 - b. We want to protect low-income household personally identifiable information (PII). What is the minimum amount of sensitive data or PII the platform needs to collect from LIHEAP recipients with community solar subscriptions?
 - c. How should customer PII be protected on the platform?
 - d. When should LIHEAP recipients be referred to community solar providers?
 - e. *LIHEAP Administrators (which may include Community Action Programs/Agencies or others that administer LIHEAP on behalf of HHS):* Beyond PII, are there challenges or concerns, with respect to LIHEAP rules and regulations that would prevent you from sharing LIHEAP recipients' contact information through the platform?
2. What differences in LIHEAP program implementation across states does the design of the platform need to consider to ensure broad accessibility and implementation?
3. What type of information technology (IT) system do states utilize for LIHEAP and how has information from this system been shared for other data exchanges?
4. What other platforms or models could serve as helpful examples for how to design the Low-Income Community Solar Subscription Platform?
5. What concerns do you have with the development of the Low-Income Community Solar Subscription Platform?
 - a. Please share any concerns you have that are specific to equity and Justice40 implications.

Category 3: Subscription Considerations

1. What should the vetting process for including a low-income community solar subscription on the platform look like and who should do it?
2. How do we ensure all subscriptions protect customer privacy and provide adequate monthly savings?
3. What is needed from community solar developers and subscription managers to ensure that LIHEAP recipients who subscribe see a minimum of 20% bill savings? If 20% bill

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

savings are promised and cannot be confirmed or are not met, how should solar developers and/or others be held accountable?

4. For developers: The platform is expected to reduce the costs of low-income subscriber acquisition, a key challenge highlighted by developers and hindering low-income household access to many community solar projects. Would you be willing to pay for access to and/or maintenance of the platform?
 - a. If so, how much? Per month? Per eligible subscriber?
5. How should the platform accommodate subscriber turnover (i.e., low-income subscribers moving out of the LIHEAP-eligible income bracket or moving)?

Category 4: Equity and Other Considerations

1. NCSP has a [2025 target](#) of powering the equivalent of 5 million American households with community solar, generating \$1 billion in energy bill savings. This Low-Income Community Solar Subscription Platform is specifically intended to enable low-income households to participate in, and benefit from, community solar savings. Are there other ways DOE can support greater deployment and availability of low-income community solar that meet the NCSP target and the objectives of the Justice 40 Initiative, either through this platform or other strategies?
2. What additional support should DOE consider beyond the Low-Income Community Solar Subscription Platform that increases low-income community solar development, reduces barriers to access subscriptions, and ensures a minimum of 20% bill savings?
3. What else should we consider?

Request for Information Response Guidelines

Responses to this RFI must be submitted electronically to EquitableSolar@ee.doe.gov no later than 5:00pm (ET) on August 31, 2022. Responses must be provided as attachments to an email. It is recommended that attachments with file sizes exceeding 25MB be compressed (i.e., zipped) to ensure message delivery. Responses must be provided as a Microsoft Word (.docx) attachment to the email, and no more than 7 pages in length, 12 point font, 1 inch margins. Only electronic responses will be accepted.

Please identify your answers by responding to a specific question or topic if applicable. Respondents may answer as many or as few questions as they wish.

EERE will not respond to individual submissions or publish publicly a compendium of responses. A response to this RFI will not be viewed as a binding commitment to develop or pursue the project or ideas discussed.

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.

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

- Company / institution name;
- Company / institution contact;
- Contact's address, phone number, and e-mail address.

This is a Request for Information (RFI) only. EERE will not pay for information provided under this RFI and no project will be supported as a result of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. EERE may or may not issue a Funding Opportunity Announcement (FOA) based on consideration of the input received from this RFI.