

October 4th, 2023

U.S. Environmental Protection Agency Program Coordinator Office of the Greenhouse Gas Reduction Fund 1200 Pennsylvania Avenue NW Washington, DC 20004

Subject: Solar for All Request for Applications Funding Opportunity Number EPA-R-HQ-SFA-23-01

Dear Program Coordinator,

No state produces more electric energy than Texas and no state uses more electricity. While Texas's main electric grid has increasingly relied on new renewable resources like wind and solar, Texas is still the leading producer of carbon dioxide and other greenhouse gasses from our energy sector. Our economy is booming, and this year, we set dozens of demand records with our main electric grid - ERCOT - on both hot summer days and cold winter mornings.

Local and community solar clearly must become a bigger part of our market. While many Texans have enjoyed the benefits of both utility-scale solar on the system as well as local solar, most working Texans have not, including Texans with low and moderate incomes that do not have access to capital or credit to take advantage of either onsite or community solar products. In addition, Texas is not one electricity market, but multiple, with literally four different electric grids contained within our state, and some areas served by a competitive market, and some areas served by vertically-integrated utility, making one single approach impossible. There is tremendous opportunity to increase access to solar and reduce energy burden in low-income and disadvantaged communities in Texas.

The Lone Star Chapter of the Sierra Club is the state chapter of the Sierra Club. We have multiple regional groups throughout the state, including in Austin, San Antonio, Houston, DFW,

the Beaumont-Port Arthur and the Lower Rio Grande Valley. We are supportive of various approaches to the development and execution of proposed programs under the Environmental Protection Agency's EPA-R-HQ-SFA-23-01 Solar for All. As such, we are hopeful that the EPA will support multiple applications for Solar for All, including the application submitted by Solar For All Coalition, led by Harris County, which would use different solutions for different communities. Given the size and scope of Texas's electricity market, the EPA should consider funding multiple applications<sup>1</sup>.

Please accept this Support Letter indicating the Sierra Club Lone Star Chapter's willingness to work with the Texas Solar for All Coalition on outreach and implementation of their proposed application.

In terms of the Solar for All Coalition application, the team assembled for this program has a significant capability to implement a program to enable the growth of solar in Texas and have a multiplying effect on services and benefits provided to disadvantaged communities. Because one of our largest regional groups is located in Austin, we are particularly familiar with the proposed project in Austin, which would take advantage of Austin Energy's existing community solar program, but expand it with a unique solar buildout program that would directly benefit both those participating in community solar but also those renting their roofs for that community solar. We believe that Austin Energy is well positioned to use its experience as an industry leader on solar to finally bring the benefits of solar to Austin's Low and Moderate-Income populace.

Thus, Sierra Club's Lone Star Chapter and local Austin Regional Group is committed to serving the people of Travis and Williamson County that are served by Austin Energy by cooperating with Austin Energy on outreach and implementation of the proposed Solar for All program. While as an organization we do not take any federal funding, our mission is to build out clean energy throughout Texas, and we are committed to helping assure there is outreach and transparency in this project. Not only do we have many members and supporters who could qualify to potentially provide roof space for the solar hosting program, but we have the ability through newsletters, emails, social media and events to help bring additional information about the program and related services like weatherization and demand response. Currently, we also have staff members that serve on city advisory committees like the Electric Utility Commission

and Resource Management Commission that can help assure that the programs are well run

<sup>&</sup>lt;sup>1</sup>Under a separate letter, Sierra Club has also supported the application submitted by TDHCA, a statewide program focused on multifamily housing. We believe that there is merit in this approach as well.

and transparent.

To the extent the entire application is approved by EPA, we also have active groups in Houston, DFW, San Antonio and the Valley, and we believe these groups can play a similar role in ensuring that an Equitable Access and Meaningful Involvement Plan is implemented by the implementor in those regions.

We support the Texas Solar for All Coalition's plan to enable low-income and disadvantaged communities in Texas to deploy and benefit from residential rooftop and residential-serving community solar and storage. We commit to helping execute the Equitable Access and Meaningful Involvement Plan in the main geographic areas in which we work, and in particular, in the Austin Energy service area.

Thank you for the opportunity to express our support for the Texas Solar for All Coalition application. We look forward to working with them and the rest of the team.

Sincerely,

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