



SIERRA CLUB

LONE STAR CHAPTER

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Submitted by: Sierra Club, Lone Star Chapter

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Re: Letter of Support for TDHCA's Solar for All Application

On behalf of the Sierra Club's Lone Star Chapter, I am writing to express support for the Texas Department of Housing and Community Affairs' (TDHCA) application for \$400 million in Solar for All funds. While an increasing number of Texans have been able advantage of existing utility rebates, favorable policy on excess generation of onsite solar, and federal tax incentives, and onsite solar power is growing, for most Texans, access to clean energy from onsite or community solar has too many barriers. This is particularly true for those Texans with limited incomes, those living in multi-family housing and especially those living in geographic areas in the competitive energy market, where in general there are not good, accessible program to encourage the use of onsite solar.

As the housing agency for the State of Texas, TDHCA is well suited to implement a statewide Solar for All program and increase low-income and disadvantaged households' access to solar by installing solar systems at multifamily affordable housing properties throughout the state of Texas. TDHCA already is the state agency that leads several federally-funded efforts including WAP (Weatherization Assistance Program)

and LIHEAP (Low-Income Home Energy Assistance Program), and also is charged with approving affordable housing projects that gain access to federal tax incentives. Thus, TDHCA has an established relationship with community action networks, energy efficiency providers and housing developers in the ERCOT competitive energy markets, in areas served by electric cooperatives and municipal electric utilities, as well as areas outside of ERCOT, such as in El Paso, Amarillo, and Beaumont-Port Arthur.

Specifically, we support TDHCA in developing a Texas Solar for All program with the following components. It is our understanding that many of these aspects will be further refined in the first planning year of the grant.

Meaningful Benefits Plan

- Installing solar panels at approximately 300 properties located in mixed urban, rural and suburban Texas geographies, increasing access to solar energy for approximately 30,000 households. Participating properties and households will be a subset of TDHCA's portfolio of 1,700 multifamily affordable housing properties and 300,000 units/households.
- Incentivizing properties to participate in the program by providing free technical assistance at the pre-development stage to assess project feasibility, covering all solar system costs and installation through grants or forgivable loans, allowing for direct system ownership, and providing solar benefits education to tenants, so that their electricity bills are reduced.
- Benefiting low-income and historically disadvantaged populations by offering low-income tenants access to solar energy and ongoing energy savings during the lifespan of the project and beyond. Designing the program to ensure all tenant households experience a minimum household savings of 20% of their household utility bill or an equivalent value in saving. We are also hopeful that these energy bills can be further reduced by pairing the Solar for All program with other programs, such as TDHCA's proposed multi-family WAP efforts, funded separately from this effort.
- Selecting solar vendors with proven experience investing in hiring and training low-income populations for skilled work.
- Partnering with Community Action Agencies receiving Health and Human Services' CSBG funds from TDHCA to offer case management and other wrap-around services to tenants.

Distributed Solar Power Market Strategy

- Piloting the selection of projects in a mixture of geographies, in regulated and unregulated energy markets, within ERCOT and outside of ERCOT, and in master-metered and individually metered properties.

- Piloting the usage of storage and upgrades where feasible to promote overall grid resiliency and provide other related benefits.
- Where feasible, leveraging net metering policies to support households in maximizing benefits through uncapped credit plans.

Project-Deployment Technical Assistance Plan

- Procuring a vendor with solar-related subject matter expertise to provide technical assistance, and using the first year of the grant to develop an implementation plan.
- Using guidance from the technical assistance vendor to develop all program policies related to project technical and economic analysis, project deployment assistance, siting, permitting, interconnection issues, and coordination with utilities, among other areas.
- Vetting and selecting experienced solar installers.

Equitable Access and Meaningful Involvement Plan

- Procuring a community engagement vendor to spearhead community engagement efforts for the program, ensuring all program communication and education components are available in other languages to persons with limited English proficiency.
- Seeking input and incorporating feedback throughout the life of the program from solar stakeholders, including utilities, properties, community-based organization and tenants.

We understand and respect TDHCA's record in administering federal funds in a timely, compliant and impactful manner, and fully support them in their submission of the Texas Solar for All grant application. We do want to make it clear that while we fully support TDHCA's application and hope it is given priority, we are also hopeful that given the size of Texas, and the very real electric challenges our main grid is facing, that the EPA and DOE will also consider approving more than one application, and consider other applications that are focused on more specific geographic areas. Still, it is worth noting that this particular application is the only one with statewide reach.

Best Regards,

Cyrus Reed
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