



SIERRA CLUB

LONE STAR CHAPTER

July 20th, 2023

Honorable Governor Greg Abbott, Governor of Texas

cc. The Honorable Comptroller Glenn Hegar, Comptroller of Public Accounts
Chairwoman Kathleen Jackson, Public Utility Commission of Texas

Dear Governor Abbott,

Sierra Club urges you to accept Texas's allocation of Solar For All Grant funding that the U.S. EPA has made available to your state. While we are unsure which state agency is the logical one to apply for the money - the PUCT, the State Energy Conservation Office, a unit of the Texas Comptroller of Public Accounts, or even another agency like the TDHCA, we urge you to take advantage of this unique opportunity to bring onsite and community solar to communities across Texas, which will also help make our electric grids more resilient. As a courtesy, we are sending a copy of this letter to Chair Jackson and Comptroller Glen Hegar.

The Solar For All grant competition was created through the Inflation Reduction Act's Greenhouse Gas Reduction Fund (GGRF) to increase accessibility to affordable, clean, and resilient solar energy for low-income and disadvantaged households, while also creating jobs and lowering energy costs.¹ Solar For All will provide grants to states, local governments, tribes, and certain eligible nonprofits to promote the expansion or creation of community solar programs for low-income and disadvantaged communities.² Solar

¹ Biden-Harris Administration Launches \$7 Billion Solar for All Grant Competition to Fund Residential Solar Programs that Lower Energy Costs for Families and Advance Environmental Justice Through Investing in America Agenda, U.S. EPA, <https://www.epa.gov/newsreleases/biden-harris-administration-launches-7-billion-solar-all-grant-competition-fund>.

² *Supra*, note 1.

For All provides up to 60 awards, including an award set aside to serve each U.S. state and territory.³ Funding through Solar For All can be used for subsidizing and providing other financial assistance to residential rooftop and community solar projects benefiting low-income and disadvantaged communities,⁴ as well as funding project-deployment technical assistance, which includes workforce development and community outreach.⁵

Accepting this funding is straightforward, and involves two steps. **First**, by the **July 31, 2023** deadline for states, you must submit to U.S. EPA by email (ggrf@epa.gov) a Notice of Intent (NOI) to participate in this program. Your NOI must include one document as an attachment that must contain: (1) a letter or memo in support of applying to the competition signed by an authorized official;⁶ and (2) answers to the following three questions: (a) Applicant Name; (b) Applicant Eligibility (indicating that the applicant is a state or U.S. territory); and (c) Number and Type of Application you plan to submit.⁷ Applicants are eligible to receive funding anywhere between \$25–\$400 million, depending on how many households they intend to serve.⁸ **Second**, by the deadline of **September 26, 2023**, the lead state official must submit a detailed application; descriptions of these application components can be found in the EPA's Solar For All Funding Opportunity Full Announcement, available on the grants.gov website.⁹ All applicants must have an active [SAM.gov](https://www.sam.gov) and [Grants.gov](https://www.grants.gov) registration in order to apply for a grant under this program. You should register in these systems now if you think you may apply for a federal grant as the process can take a month or more for new registrants.

³ EPA-R-HQ-SFA-23-01: SOLAR FOR ALL Grant Opportunity, Grants.gov, <https://www.grants.gov/web/grants/view-opportunity.html?oppId=348957> (pdf for the full announcement located under the related documents tab, requires download).

⁴ The Council on Environmental Quality provides a mapping tool to help determine overburdened and underserved census tracts that are considered disadvantaged: <https://screeningtool.geoplatform.gov/en/#22/32.7017066/-94.05431374>.

⁵ EPA-R-HQ-SFA-23-01, *supra* note 4.

⁶ Either signed by an official within the relevant governor's (or D.C. mayor's) office or the director of the agency that will respond to the Solar For All competition; EPA-R-HQ-SFA-23-01, *supra* note 4.

⁷ For question 3 you must provide the following information:

- (a) Award option (as a state entity, you are only eligible for award option #1);
- (b) Program location (describe geographic coverage (including territories, Tribes, municipalities) the program will cover); and
- (c) Estimated EPA Funding Requested (based on impact ambition of the program).

⁸ An applicant can apply for a small-sized program (\$25-\$100 million, serving up to 10,000 households), a medium-sized program (\$100-\$250 million, serving anywhere between 10,000 – 30,000 households), or a large-sized program (\$250-\$400 million, serving greater than 30,000 households). EPA-R-HQ-SFA-23-01, *supra* note 4;

<https://www.epa.gov/newsreleases/biden-harris-administration-launches-7-billion-solar-all-grant-competition-fund>.

⁹ EPA-R-HQ-SFA-23-01, *supra* note 4.

Low-income and disadvantaged communities in your state are struggling with the high cost of energy. Solar For All is a once in a generation opportunity for Texas to invest in providing access to clean and resilient solar energy for low-income and disadvantaged communities. By accepting U.S. EPA's allocation of Solar For All grant funding to Texas, you can improve Texas's plans to reduce air pollution, and help close the equity gap in access to solar energy, at no cost to your state's budget. In fact, four cities in Texas currently do not meet EPA's tough standards for ozone, and increasing solar in our cities will help lower emissions.

Given our hot climate and the record electric demand we are seeing this year, onsite solar can also help provide local energy solutions to our stressed grid without the need for expensive transmission upgrades.

We urge you to accept this Solar for All funding and to act by the approaching July 31, 2023 deadline.

Sincerely,

Cyrus Reed

Conservation Director

Lone Star Chapter, Sierra Club

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PS. If we can assist you or the relevant agency with the application process, or you need additional information, please feel free to contact me or relevant staff.