

Program Strategy Narrative

1. Program Strategy Narrative: The Oregon Solar For All Coalition (OSFAC) is ready, willing, and eager to provide technical and financial assistance that will enable low-income households and disadvantaged communities (DACs, referred to collectively as “low-income and DACs” in this proposal) to adopt, and benefit from, solar technologies. The OSFAC membership includes Oregon Department of Energy (ODOE), serving as the prime applicant, Energy Trust of Oregon (ETO), and Bonneville Environmental Foundation (BEF) serving as non-lead coalition members. OSFAC members all operate services that are designed, sometimes statutorily, to benefit low-income households. All three organizations have experience operating programs with carve-out requirements for low- to moderate-income households or low-income service providers. **The OSFAC is grounded by one simple, pragmatic truth: despite our efforts and past programmatic successes to date, most low-income households and DACs still struggle to access the benefits of solar technologies.**

The OSFAC aims to change that reality. We plan to tilt the adoption trend line upward and promote significant solar adoption within low-income households and DACs, which will in turn reduce greenhouse gas emissions and other air pollutants while mobilizing financing and private capital.

The OSFAC will leverage existing solar technology incentives and support platforms through a coordinated program delivery system designed specifically to meet the needs of low-income households and DACs. Together, OSFAC members will deliver financial and technical assistance across five distinct pathways: 1) enable solar installations at **single-family** households with little to no upfront customer cost; 2) point of sale rebates for **multifamily** buildings that provide tangible benefits to low-income residents; 3) financial and technical assistance to develop community solar projects under the Oregon Community Solar Program (**OCSP**), a program regulated by the Oregon Public Utility Commission¹; 4) financial and technical assistance to develop Consumer-Owned Utility Territories’ Community Solar (**COUTCs**) projects in areas outside of OCSP coverage; and 5) **workforce development activities**.

Under this five pathways approach, solar technologies and – most importantly – the benefits that result from solar technologies will be made accessible to Oregon’s low-income households and DACs.

1. Impact Assessment: Collectively, the OSFAC anticipates achieving ambitious, but achievable, outputs and outcomes through the life of this project for Oregon.

Outputs and Outcomes of the OSFAC	Single-Family	Multifamily	COUTCs	OCSP	Total
Total number of households projected to benefit from the solar program	3,581	3,320	2,596	4,324	13,821
Award funding requested per household:					\$10,034

¹ Oregon Public Utility Commission regulates the OCSP and is not intended to be a subrecipient nor contractor under this award.

Program Strategy Narrative

Megawatts of solar capacity deployed	17.9 MW DC	10 MW DC	13 MW DC	20.9 MW* DC	61.8 MW DC
Award funding per megawatt of solar capacity across total funding requested:					\$2.24 million
Megawatt hours of solar production	568,447 MWh	340,134 MWh	337,544 MWh	615,363 MWh*	1,861,488 MWh
Megawatt hours of storage capacity deployed over time	NA	2.4 MWh	0.8 MWh	NA	3.2 MWh
Award funding per megawatt hour of storage across dedicated storage funds:					\$3.2 million
Award funding per megawatt hour of storage across total funding requested:					\$43.3 million
Tons of CO2 avoided	388,249 tons	232,312 tons	230,542 tons	420,293 tons	1,271,396 tons
Award funding per Tons of CO2 avoided:					\$109.08
Household savings	\$69,910,426	\$41,831,354	\$31,221,007**	\$38,539,982**	\$181,502,769
Award funding per dollar of household savings:					\$0.76

* Denotes solar capacity dedicated to low-income households only. ETO anticipates 40.6 MW of new solar capacity will be deployed under the OCSF; **Assumes a 20-year life for community solar assets, opposed to a 25-year life for single-family and multifamily.

OSFAC members drew from their collective experience in providing financial and technical assistance to solar projects to develop the outputs and outcomes described throughout this application. OSFAC members agree the table above contains reasonably achievable metrics based on historical data held by OSFAC members.

The OSFAC is composed of three member entities: **ODOE**: ODOE is a state agency whose mission is to help Oregonians make informed decisions and maintain a resilient and affordable energy system. We advance solutions to shape an equitable clean energy transition, protect the environment and public health, and responsibly balance energy needs and impacts for current and future generations. **ETO**: ETO is an independent nonprofit organization created to advance the development of clean energy resources in the state of Oregon. Since 2002, ETO has been charged by the Oregon Public Utility Commission to administer ratepayer-funded energy efficiency and renewable energy programs. **BEF**: BEF brings together partners across all sectors of society to create innovative solutions to address climate challenges, sustain healthy freshwater ecosystems, and catalyze a renewable energy future for all. BEF has been breaking down barriers to renewable energy adoption for the past 25 years and has pioneered several advances in the sector.

OSFAC members reviewed historical data to make realistic projections for expected results that will be achieved under this proposal within the period of performance. OSFAC projections of estimated MW impacts and households served are primarily informed by: 1) results of state- and ratepayer-funded programs to date; 2) the available in-state budgets the OSFAC members plan to use to leverage and expand the impact of SFA dollars; and 3) current community solar regulatory limits. The OSFAC's collective experience is described below.

Program Strategy Narrative

Single-Family: Both ODOE and ETO have experience implementing incentive programs in the single-family market and for income-qualified households specifically. The OSFAC team will leverage existing programs and use grant funds to better serve low-income households and to augment the program delivery infrastructure that already exists in the state. In 2020, ODOE established the Oregon Solar + Storage Rebate Program (OSSRP), which provides incentives for solar technology on single-family households. During the first four years of the OSSRP program, ODOE has processed rebates for 4,480 households, with an average incentive for a solar system of \$2,776.88. ODOE's program also has a low-and moderate-income carveout, reserving rebates specifically for low-income service providers and low- to moderate-income households. Of the 4,480 rebates processed for households, 930 were for low- and moderate-income households and these had an average rebate for a solar system of \$4,960.68. Since 2003, ETO has managed a ratepayer-funded solar rebate program that has supported more than 25,000 distributed solar installations in Oregon. ETO's Solar Within Reach program was launched in 2019 and provides increased incentive payments and program delivery services to single-family residences that meet income qualifications. Solar Within Reach incentives stack on top of ODOE's OSSRP incentives. During the first four years, the Solar Within Reach program helped more than 1,500 households with low- to moderate-income install a home solar system, with 12 MW of solar capacity installed through the program to date.

Multifamily: All OSFAC members have provided either financial or technical assistance to multifamily solar projects. ODOE's OSSRP program includes enhanced rebates for solar deployment on low-income service providers' buildings. While this rebate offering is not exclusive to residential housing, since the start of this program 112 projects for low-income service providers have been funded. Additionally, ETO's Solar for Affordable Multifamily incentive, established in 2021, provides incentives for qualifying projects that serve income-qualified customers. To date, this incentive offer has supported 82 operational or currently-in-development projects. BEF has considerable experience providing technical assistance for solar development on multifamily affordable housing sites. The BEF-led team also participated in a U.S. DOE "Solar in Your Community Challenge" that aimed to expand access.

Oregon Community Solar Program (OCSP): Oregon's three Investor-Owned Utility (IOU) territories provide electrical service to approximately 74 percent of Oregon's population. Within IOU territories, OSFAC's community solar project support will leverage the existing OCSP, a state-level program overseen by the Oregon Public Utility Commission (OPUC). ETO is deeply involved in OCSP as part of the program administration team that manages program operations on behalf of the OPUC. In this role, ETO directly engages with and oversees project managers and supports participants. ETO is active in project review and approval, participant verification, customer service and education, code of conduct enforcement and dispute resolution, and general ongoing operational management of the program. ETO has also offered limited financial incentives to projects that exceed program requirements in low-income enrollment.

In OCSP, community solar projects are developed and managed by independent project managers, including professional solar developers, community groups, and renewable energy cooperatives. Project managers are responsible for identifying and developing solar projects and recruiting customers to participate in these projects as subscribers. Households and businesses sign participation agreements to receive bill credits associated with the production of a percentage of

Program Strategy Narrative

the solar project. The OPUC sets the value of the bill credits. Participants typically pay a \$/kWh charge to the project manager that is slightly lower than the value of the bill credits they receive, allowing for net household energy savings. Program rules require that at least 10 percent of each project's capacity be reserved for low-income participants, and that low-income participants be charged no more than 60 percent of the value of the bill credits they receive, providing for enhanced household energy savings for these customers. The program has also adopted considerable consumer protections governing low-income household participation in the program.

The OCSP was launched in 2020 with a maximum program capacity of 161 MW-AC. To date roughly 29 MW-AC of program capacity has become operational, including 3.6 MW-AC subscribed by nearly 1,000 low-income households. Another 87 MW-AC of project capacity is currently in development. Special program rules apply to most of the remaining unallocated program capacity. Approximately 37 MW-AC of “carveout” capacity is available only to projects that either demonstrate substantial community leadership or that reserve at least 50 percent of program capacity for low-income participants — and few projects have come forward that satisfy these higher thresholds in the absence of additional financial support. The OSFAC team's core approach to community solar projects in IOU service area is to provide the financial and technical support necessary to fill the remaining program capacity with projects that reserve at least half of their capacity for eligible low-income households, while prioritizing and supporting community-led projects.

Consumer-Owned Utilities Territories' Community Solar Programs (COUTCS):

Thirty-eight Consumer-Owned Utilities (COU)² provide electrical service to about 26 percent of Oregon's population. Oregon's COUs tend to be small, diverse, and have service territories that overlap with many DACs in the state. BEF has extensive experience working with COUs, and as early as 2005 supported one of the first community solar projects in the nation. BEF has assisted more than 30 distinct COUs in developing and advancing their own community solar programs, including many that support low-income participation and meaningful benefits to communities. BEF provides technical assistance, project development, project finance, grant writing, and project management support to utility partners.

Workforce Development: The OSFAC members individually have supported workforce development efforts, but none have substantial experience as a program administrator yet. In Oregon's 2023 legislative session, ODOE was directed by HB 3409 to “partner with other state agencies...to reduce financial and nonfinancial barriers to home energy efficiency and resilience.” The bill established a \$2 million training fund that will build capacity to support energy efficiency and resiliency through workforce training and development. This state directive complements the approximately \$2 million formula funding the agency expects to receive under the Training For Residential Efficiency Contractors Grants offered by the U.S. DOE. ODOE will align, to the extent practicable, workforce development activities related to both clean energy and energy efficiency within our internal operations, leveraging a common advisory workgroup and designing program models that support myriad workforce development structures and programs that currently operate in Oregon. The OSFAC will not “reinvent the wheel” but will instead enable existing organizations

² This number includes municipally owned utilities and people's utility districts as well as cooperatives. For simplicity and because the programmatic pathway for serving the customers of utilities with community solar programming is the same, this applicant jointly refers to this group of utilities as “consumer-owned.”

Program Strategy Narrative

to serve more individuals and to extend training opportunities to less densely populated rural and coastal areas of the state where the workforce needs are greater. OSFAC identified several Oregon-based organizations that are actively working on career exposure, training, and recruitment in the energy sector, with special attention to opportunities in the trades and to recruiting women and minority populations who have been historically under-represented in the sector.

The OSFAC members performed an assessment of market barriers while preparing this application. Solar technologies pose enormous potential for good in Oregon. However, solar technologies have not been scaled significantly because of market barriers. The OSFAC identified two primary market barriers that have shaped the current state of solar adoption to date, but also assessed additional market barriers found in the *Distributed Solar Market Strategy* section of this application. The two primary market barriers include: 1) lack of financial assistance and 2) lack of technical assistance. Both of those market barriers can be overcome with funds provided by Solar For All when leveraged with other opportunities provided under the Bipartisan Infrastructure Law and the Inflation Reduction Act (BIL & IRA).

Lack of financial assistance continues to pose a barrier to many low-income households across program and housing segments. While ODOE and ETO both offer substantial financial incentives for solar installation by income-qualified households, these program efforts primarily serve moderate-income customers — as many low-income households, particularly those without the tax liability necessary to monetize federal tax credits, would be challenged to contribute or access financing to cover the necessary customer cost share. To successfully reach low-income households, the single-family program must be able to offer solar installation with little to no upfront cost.

The lack of financial assistance also poses challenges to multifamily, OCSP, and COUTCS programs. Without additional funding that addresses project capital requirements while providing low-income household energy savings, and that supports early-stage planning and development work, these projects are less likely to move forward. Lack of technical assistance poses a barrier to multifamily, OCSP, and COUTCS programs even when funding is identified. Developers and community-based organizations face non-financial barriers such as: issues related to the technical complexity of projects and understanding, and planning for and developing the capacity for long-term management responsibility of projects. The availability of project-specific technical assistance is currently very limited. As a result, projects do not move forward because of the complex regulatory, financial, and administratively burdensome aspects of solar development.

The OSFAC program will address these primary barriers with the strategies described in the *Financial Assistance Strategy* and *Project-Deployment Technical Assistance Strategy* sections of this application. The OSFAC intends to provide increased financial and technical assistance to a diverse spectrum of entities and households to reduce barriers to solar adoption in low-income households and DACs.

The OSFAC is strategically structured to augment existing programs capable of serving low-income households, but through an improved comprehensive approach across Oregon's geography, demographics, and regulatory framework. All OSFAC members are individually eligible to apply under Section 134(c)(1) of the Clean Air Act, as documented in the **Memorandum of Agreement**. The OSFAC application meets the requirements for named subrecipients under this award. ODOE, as the prime recipient, will provide grants to ETO and

Program Strategy Narrative

BEF, if selected for an award. ETO and BEF are registered in SAM and have Unique Entity Identification Numbers. ODOE will ensure that required terms and conditions pass-through or “flow down” to all subrecipients, in accordance with EPA’s subaward policy.

ODOE will serve as the project lead and will support grant compliance efforts across the OSFAC. This includes procurement of systems that can streamline the rebate application process, and aspects of grant compliance, such as Davis-Bacon prevailing wage reporting. ODOE will administer rebates and incentives to single-family residences and multifamily residences throughout Oregon, regardless of which type of utility service territory they may be located in. ETO will provide financial and technical assistance to OCSP projects and also provide program delivery services to support residential solar installations in IOU territories, and BEF will foster the development of COUTCS projects. Lastly, ODOE will coordinate workforce development activities that support the growth of the solar industry and workforce to support the deployment of solar technologies to low-income households and DACs. This information is also described in *Attachment H: Organizational Table*. Where appropriate, ETO and BEF will provide either subawards or contracts, based on determinations made under 2 C.F.R. Part 200.331, to community-based organizations to support the ongoing engagement of low-income households and DACs in the deployment of specific projects supported by the OSFAC.

Under the OSFAC’s approach, existing low-income offerings will be supplemented by providing additional stackable incentives for single-family and multifamily residences. This will complement existing efforts to enable low-income households to access the benefits of solar technology in multifamily settings, such as the OSSRP. OSFAC’s approach will also leverage Oregon’s regulatory framework under the OCSP and dedicate resources to serving low-income households within the existing program. This also supplements the technical assistance provided by BEF to COUTCS programs. Additionally, the OSFAC will deploy limited enabling upgrades, primarily outside of single-family settings, where necessary. The OSFAC strategy is to work with other agencies and entities that provide enabling upgrades to single-family households to identify residences that do not require significant upgrades to support a solar installation. This will leverage existing resources within Oregon and maximize the number of households that can be served in the period of performance.

2. Meaningful Benefits Plan: The OSFAC is committed to providing meaningful benefits to low-income households and DACs. In demonstration of this commitment, the OSFAC will develop a plan to ensure that all households experience a minimum household savings of 20 percent, or a direct non-financial benefit equivalent.

After engagement with stakeholders is conducted during the planning phase, OSFAC members will implement detailed criteria to ensure minimum household savings are achieved. OSFAC will use utility data available through EIA or in-state sources to determine required household savings levels, and will ensure that households supported by the program receive at least 20 percent household energy savings on either a utility-average or building-specific basis. The OSFAC members have preliminary concepts to ensure these households savings are experienced across the four pathways:

Single-Family: During the planning phase ODOE will identify criteria, based on historical data to the extent practical, that demonstrate the proposed system is expected to return a minimum savings of 20 percent based on the average utility bill in that utility’s territory or on the unique

Program Strategy Narrative

household data. ODOE will use these criteria to create standardized requirements of all projects receiving financial assistance. OSFAC's objective is to fully fund, or nearly-fully fund, single-family systems by leveraging existing resources and supplementing with Solar For All funds. Following the planning phase, the OSFAC may deploy additional strategies to expand participation to more households. These strategies identified as worthy of further exploration are described in the *Financial Assistance Strategy* section of this application.

Multifamily: The OSFAC team's objective is to fund a significant portion of onsite solar and storage on affordable multifamily properties. This will be accomplished by leveraging existing in-state funding sources managed by ODOE and ETO. The OSFAC anticipates some low-income households residing in affordable multifamily buildings will be unable to directly benefit financially from a project due to the typical metering arrangements of these buildings in the state. During the planning stage, ODOE will develop specific program design criteria required for an affordable housing provider to receive an onsite solar system and share direct or indirect financial benefits with residents. Models that provide both direct and indirect benefits to multifamily residents are currently in place in Oregon. Prior ETO multifamily solar incentives and the low-income subscription mechanisms of the OCSP allow affordable housing property managers to provide an annual, off-bill payment to their residents that is equal to an agreed-upon portion of the benefit from the solar project, and this benefit model could be utilized here. ODOE will consider existing models and other options for indirect benefits indicated by HUD guidance in designing program requirements.

OCSP: The existing OCSP program rules are conducive to providing 20 percent household savings at the building level. Low-income participants in OCSP may be charged no more than 60 percent of the value of the bill credits they receive (which are valued based on retail energy rates). To avoid excess generation in a year with abnormally low energy consumption, the program's subscription sizing guidance suggests meeting 80 percent of a customer's energy needs with community solar. Accounting also for fixed utility service charges that OCSP bill credit rates are not designed to offset, a low-income OCSP participant will naturally experience roughly 25 percent household energy savings based on the current program design.

As part of the OCSP program administration team, ETO has the responsibility to suggest or verify the subscription size of each low-income customer, leveraging utility customer billing data that ETO has access to. Because of these existing processes, ETO would have the ability to ensure that low-income OCSP participants supported by Solar For All experience 20 percent household energy savings on a building-specific basis, and to monitor these savings levels over time. Lastly, customers that do not pay their own electric bill can participate in OCSP. In this scenario, the entity that pays the electric bill for a low-income household, which is typically the housing provider, can participate in the program on behalf the low-income household(s). This entity must submit annual documentation to the OCSP administrator demonstrating that at least 87.5 percent of the net financial benefits received have been shared directly with the resident household. During the program planning phase, the ETO team will engage OPUC and OCSP program administration partners to identify and address any challenges associated with scaling this existing program feature to meet SFA eligibility and reporting needs and to achieve greater scale.

COUTCS: Community solar within COU territories does not have a statewide program or standards that make savings easy to estimate. To ensure the minimum savings are achieved,

Program Strategy Narrative

calculations will be done by utilizing existing publicly available tools such as the Community Solar Business Case Tool, the Community Solar Scenario Tool, or customized tools developed to address the specific project or community conditions. By accurately forecasting the critical inputs – such as capital expenditures, applicable subsidies, value of energy, inflation/escalation, system efficiency, operations and maintenance costs, and financing terms – the program will be able to ensure that a minimum of 20 percent savings will be realized by the COUTCS participants. These models and review processes will ensure that all potential costs are included, such as lease payments, subscription costs, taxes, or utility allowances, and that the projected and realized savings are a calculated net of these potential costs to ensure that the program and products do no harm to the participating households. With quick annual calculations of reported information from projects, BEF can assess if the projections of savings are being realized by looking at production, bill credit value, and factoring in any participant costs.

As described in the *Reporting Plan*, ODOE will randomly sample completed projects to verify savings achieved for households annually across the four project-based pathways above. If this evaluation indicates that the necessary savings levels are not being achieved, programmatic adjustments will be made within six months of completion of random samplings to ensure compliance with grant requirements.

The five pathways approach employed by OSFAC will increase low-income and disadvantaged households' access to solar through deployment of both financial and technical assistance, which will mitigate the two biggest barriers to solar adoption in low-income households and DACs. As described more fully in the *Financial Assistance Strategy* and the *Project-Deployment Technical Assistance Strategy*, OSFAC's strategy is intentionally focused to remove the largest barriers to solar adoption. The OSFAC strives to offer solar systems for little to no upfront cost to low-income households and provide significant incentives to multifamily and community solar projects. By providing technical assistance, the OSFAC will meaningfully grow the development of OSCP and COUTCS projects in Oregon.

Additionally, the program will deliver energy resilience and grid benefits through carefully constructing criteria during the planning phase to determine where storage may be cost effective to pair with a solar system. In an ideal scenario, all solar would be paired with storage, but there are practical market realities governing not only the cost of such projects, but also challenges to the supply chain and electrical grid. During the planning phase, OSFAC members will determine specific installation scenarios that warrant storage under this program. Possible considerations include facilities that are at the end of distribution lines and therefore vulnerable to outages, residents who reside in Public Safety Power Shutoff areas, residents with critical medical needs for resilient power, and in certain scenarios where more than just the resilience value can be accrued, such as participation in a utility's demand side management program.

Single-Family: ODOE will consider the conditions in which storage in a single-family residence is a cost-effective investment. ODOE will not widely deploy storage on single-family residences but may evaluate whether this funding should be made available for residents living in Public Safety Power Shutoff areas, who are most vulnerable to grid outages, or those with medical conditions are exacerbated by a grid outage. Storage rebates provided under this program may also leverage a \$2,500 rebate offered through the OSSRP and ETO's newly launched battery storage incentive offer of up to \$10,000 for storage installations for income-qualified households.

Program Strategy Narrative

Multifamily: ODOE intends to prioritize storage in multifamily settings where resilience benefits will be available to all residents. Resilience benefits will be identified and measured for each specific project. To the extent practicable, this will be in alignment with the U.S. Department of Housing and Urban Development guidance.

OCSP: Storage cannot currently be accommodated in OCSP projects. However, there may be an opportunity to work with OPUC to revise program rules to allow such investments, particularly on project sites that serve critical community infrastructure in low-income households and DACs. OSFAC will engage OPUC, utilities, and program stakeholders to explore whether such programmatic changes are possible and practical within Oregon's regulatory framework. If rule changes are deemed appropriate, ETO would coordinate with OCSP program staff in revising program rules in the next available annual update to the OCSP Program Implementation Manual, and would revise the OCSP project funding strategy to include storage. However, these changes are not necessary for OCSP to deliver the benefits contemplated in this proposal.

COUTCS: Some COUTCS projects may be located at a residential building site, such as affordable housing. If the solar is then interconnected to the facility, whether common areas or households, battery storage could be added and support the facility operation during a grid outage. The potential deployment of storage on COUTCS project sites will be examined by BEF on a case-by-case basis, based on the unique benefits and detriments that would be experienced based on the project design. The OSFAC program will also maximize household and community ownership models and support low-income and disadvantaged households and communities to build equity across the four project-based pathways as described below:

Single-Family: Participating households are likely to build equity in their homes because the solar is attached to the home and the incentives will cover the majority of the cost of a system installation. To the maximum extent possible, ODOE is seeking to minimize the role of any financing products needed to support the installation and equipment costs on residential solar. OSFAC is prioritizing this approach to prevent low-income households and DACs from becoming straddled with long-lasting insurmountable debt.

Multifamily: ODOE is committed to exploring methods of promoting community ownership or building equity of residents in a multifamily setting during the planning phase, but recognizes there may be various legal hurdles in a multifamily setting that OSFAC may not be able to overcome in all contexts.

OCSP: Models for community ownership already exist in Oregon and can be leveraged by this program. In OCSP, currently operational projects include a participant-owned project, a cooperatively owned project, and several non-profit-managed projects.

ETO anticipates providing deep support to community-based organizations that intend to pursue community ownership models and will hire dedicated staff to advise these projects through the development process. This will include guidance and technical assistance on a range of factors including monetizing federal tax credits through new Elective Pay mechanisms (which could enable asset ownership by nonprofit entities), partnering with lenders to obtain low-cost financing through tools and funding sources such as U.S. DOE's Community Power Accelerator platform and EPA's National Clean Investment Fund opportunity. ETO anticipates supporting community ownership models structured through both cooperative and nonprofit organizations.

Program Strategy Narrative

COUTCS: Community solar projects owned by COUs provide an indirect means of community ownership. Several COUs in Oregon have developed community solar projects that are directly or indirectly controlled by utility customers. In Ashland, Oregon, for example, a cooperative was formed by community members who came together to advance more distributed generation. Communities across Oregon can replicate these and other models to sustain COUTCS projects far beyond the performance period.

Workforce Development: ODOE proposes a three-part plan to invest in jobs and businesses in low-income and DACs. The three part-plan includes: 1) the creation of a solar business accelerator to provide business growth coaching and mentorship; 2) financial support programs that provide career exposure, pre-apprenticeship, education and training programs, and transitions to employment related to the solar industry; and 3) the convening of industry leaders and worker representatives to discuss methods for ensuring that ODOE's workforce development efforts create opportunities for graduates of pre-apprenticeship and other training programs.

Under the first part of this plan, ODOE will establish an Oregon Solar Business Accelerator (OSBA) to offer business development and mentoring to businesses associated with the deployment of solar technology. The OSBA will, to the extent practical, prioritize services to: minority- and women-owned businesses; other businesses that are certified under Oregon's Certification Office for Business Inclusion and Diversity; businesses located or serving customers in historically underutilized business zones; or businesses that operate east of the Cascade Mountain range or in coastal communities where there are fewer contractors offering solar installations. Program activities may include workshops on topics such as: 1) industry best practices; 2) business growth strategies; or 3) business mentorship. This intensive model is anticipated to serve two cohorts of six to eight businesses each. This will benefit solar deployment in regions of the state that have limited to no solar contractors.

In the second part of the plan, the OSFAC is committed to expanding opportunities for workers from underserved communities by providing skills and certifications leading to high quality jobs. To fulfill this commitment, ODOE will offer a competitive grant program to support a variety of workforce development programs related to the solar industry. Projects of interest include, but are not limited to, career awareness and exposure programs, development and expansion of pre-apprenticeship programs, short-term training programs (to benefit both participants and instructors), tuition assistance, workplace experiences such as internships, on-the-job training, and mentoring for newly employed individuals. The program will also offer wraparound supportive services, requiring at least \$350,000 to be deployed as wraparound supportive services by grantees. Dedicated wraparound support services will enable participants, particularly those from low-income or DACs, to enroll and stay enrolled in education, training, and initial periods of employment in occupations that support the solar industry. The dedication of funds for wraparound supportive services will be detailed during the planning phase and will comply with *EPA's participant support costs policy*.

In the third part of the plan, ODOE will convene discussions about methods to connect graduates of training and certificate programs to employment opportunities. ODOE will leverage a new Clean Energy Advisory Work Group as part of ODOE's new workforce development legislative directive. The Clean Energy Advisory Work Group will allow for the facilitation of workforce conversations with industry leaders, workers and their representatives, and organized

Program Strategy Narrative

labor representatives to request feedback on plans, policies, procedures, and concrete goals to work with labor unions, developers, contractors, and other partners as such items evolve throughout the planning phase. Where appropriate, ODOE will coordinate with other workforce efforts in the state for additional feedback and advice, including an energy workforce coalition, convened in 2022 to coordinate outreach among Oregon-based organizations sharing a common interest in attracting the next generation of energy sector workers.

During the planning phase, the OSFAC is committed to working with industry leaders and worker representatives, including organized labor, to explore methods such as community workforce agreements or labor standards to ensure that workforce development efforts result in quality jobs reflecting “high road” labor practices, including providing family-sustaining benefits, predictable work schedules, retirement contributions, safe working conditions, and the free and fair choice to join a union. OSFAC members are committed to supporting good jobs in local communities to the extent practicable, recognizing that in rural areas in particular, project laborers may need to be trained and sourced from urban locations to meet performance period requirements under the award and that regional differences in wages, available workforce, and training resources may require regional adjustments to any community agreements or labor standards considered.

As described above, ODOE’s dedication of program funds for grants to new and existing workforce development programs will be open to potential investments in pre-apprenticeship programs, which will prepare candidates for Registered Apprenticeships. ODOE commits to providing funding opportunities that may support a variety of training pathways, including pre-apprenticeship programs, short-term training, and tuition assistance. These will help ensure workers a free and fair choice to collectively bargain and join a union as they progress through their career.

During the planning phase, OSFAC members will explore concepts like requiring all contractors to commit to remaining neutral in union organizing and operations, as well as project labor agreements or community workforce agreements, or standards that promote similar worker benefits on projects of a significant size. As stated above, this desire to create good jobs in local communities will also be balanced against the need to avoid potential implementation delays given the limited period of performance. The Clean Energy Advisory Work Group may be consulted on such considerations during the planning phase.

OSFAC’s plan to provide meaningful benefits has strong stakeholder support. This support is demonstrated by the letters of support included in *Attachment I*.

3. Distributed Solar Market Strategy: Within the relevant power market structures, the OSFAC identified the following barriers hindering the adoption of solar technologies in low-income households and DACs which the Coalition plans to further evaluate, if not address, during the planning phase. To the extent possible, the OSFAC designed this program to overcome most identified barriers. This plan is supported by stakeholders as demonstrated by the letters of support included in *Attachment J*.

Net Metering Policies: In Oregon, net metering policies differ between the three IOUs and the 38 COUs. For the 74 percent of Oregon households that are IOU customers, customers may net meter up to 25 kW of residential or 2 MW of commercial solar capacity and benefit from annualized net energy billing at the retail rate. Net metering in IOU territories is not expected to pose a barrier to project deployment. In COU territories, state law enables customers to net meter

Program Strategy Narrative

up to 25kW of solar capacity on residential or commercial sites but does not require monthly surplus generation to be carried forward to future bills or dictate the rate at which the customer is compensated for surplus generation. Beyond the 25kW net metering requirement, COU net metering policies are established by the governing bodies of the utilities. All Oregon utilities are allowed to discontinue their net metering policies once the aggregated capacity of all net metered systems in their service territory exceeds 0.5 percent of the historic peak load.

Existing net metering policies in COU territories may deter a limited number of single-family and multifamily adoptions. Within a single-family setting, COUs that do not offer annualized net metering or that compensate the customer for surplus generation at a wholesale rate present a barrier to solar systems because surplus energy generation in summer months may be valued at lower than the retail rate and/or cannot be carried forward to winter months. This practice may deter single-family households from installing a system that can generate a high percentage of their annual energy. In a multifamily context, the 25kW system capacity limit is expected to hinder the number of multifamily installations that are capable of meeting the required household savings under this program.

Each of Oregon's 38 COUs are different. A COU may choose to amend its net metering requirements as part of the public processes. Some COUs have adopted progressive virtual net metering policies to enable the maximum amount of distributed generation. ODOE and BEF will stay informed on these unique policies during the period of performance. While some policies may deter specific households from adopting solar, ODOE does not anticipate these policies to be barrier to deployment of financial assistance in this project

Third-Party Owners Policies: Third-party owners (TPO) of residential solar facilities are allowed in Oregon. However, there are no TPOs currently active in the residential market, despite Oregon's history of having third-party owners. From 2011 through 2015 there were more than 2,300 residential solar installations completed by TPOs. During this time period, these installations were supported with a \$6,000 state residential energy tax credit. After the sunset of the tax credit in 2016, most of the TPOs ceased business operations in Oregon.

TPOs can be particularly useful in supporting onsite solar installations at low-income households that may lack adequate tax liability to monetize the Federal Investment Tax Credit (ITC). The TPO has potential to monetize both the ITC and associated benefits, such as Modified Accelerated Cost-Recovery System (MACRS). However, there have also been some negative aspects to TPOs in Oregon. Administrators of solar incentive programs, including ODOE and ETO, have struggled to get accurate cost information from some TPOs. Quality and customer service concerns also arose with some high-volume TPOs in the past that could be compounded in an effort to serve vulnerable low-income and DACs.

During the planning year, ODOE will investigate the viability of a private-sector TPO strategy that relies on tax equity partners to own solar systems installed by the in-state network of solar installers in a single-family setting. ODOE will evaluate these options in collaboration with community groups and other key stakeholders to ensure that any TPO options that are made available to low-income customers provide appropriate customer protections and are suitable for and benefit vulnerable customers.

Program Strategy Narrative

In a different context, TPOs are a model for the development of community solar projects. At this point, OSFAC does not anticipate any legal or regulatory changes being necessary to enable a TPO strategy.

The Interconnection Process: While interconnection challenges can affect projects of any size, in Oregon these are felt more acutely by community solar projects than net metering projects. In Oregon, community solar projects are typically interconnected according to the Small Generator Interconnection Procedures (SGIP) overseen by OPUC within IOU territories, or by Bonneville Power Administration (BPA)³ within COU territories. SGIP interconnection procedures are primarily designed to accommodate projects of a larger scale than community solar. Many in-state community solar projects, and in particular smaller-scale projects organized by community-based organizations that lack professional solar development expertise, encounter delays and barriers related to interconnection.

Oregon has developed several tools aimed at improving interconnection in IOU territories. These tools include: a dedicated interconnection queue with simplified eligibility procedures for OCSP projects, increased utility coordination on interconnection “fast track” pathways, and data resources available to projects to understand the viability of interconnecting at a given location. However, significant interconnection challenges remain. ETO and BEF will expand existing resources to provide a higher level of service to projects undergoing the interconnection process. In both OCSP and COUTCS projects, ETO and BEF will take advantage of the planning phase to identify specific needs and delivery options appropriate for community solar technical assistance. This includes seeking input and guidance from COUs and OCSP stakeholders as part of this assessment. At minimum, technical assistance will take the form of dedicated staff capacity to support OCSP and COUTCS projects in navigating interconnection challenges. ETO and BEF will also conduct outreach and provide best practice information to the project development community and may also hire independent electrical engineers, interconnection specialists, or subsidize utilities to support projects and utilities alike in accurately assessing interconnection impacts.

For COUTCS projects, there is another barrier that exists – inconsistency. While the process to submit an SGIP to BPA is the same for each utility, distribution system impacts are evaluated differently across utility jurisdictions. If the evaluation process is outsourced to third-party engineering firms by the distribution utility, these engineers could use different methods for evaluation and create variable requirements that may affect project costs, operation, and feasibility. To support utilities and improve consistency, BEF will promote the existing interconnection rules, share resources such as DOE’s i2X e-Xchange, and share best practices from other studies such as the publicly available Interstate Renewable Energy Council’s (IREC) Freeing the Grid study.

Renewable Portfolio Standard (RPS): OSFAC does not anticipate that Oregon’s RPS will pose a barrier to implementation. Oregon has an RPS, but it is not of particular relevance to the deployment of residential solar or community solar in the state. Thus, the OSFAC does not intend to dedicate effort in this area.

Enabling regulatory frameworks: Oregon’s regulatory framework provides adequate community solar deployment caps and carveouts to targets established in the *Impact Assessment*.

³ Bonneville Power Administration has an oversight role and is not intended to be a subrecipient nor contractor under this award.

Program Strategy Narrative

OCSP: No regulatory changes are needed to enable the OSFAC's deployment plans because the funding proposal is designed to fill the remaining unallocated capacity in the existing state community solar program. The OSFAC's plans to deploy community solar in IOU service area will leverage the program infrastructure of and be fully compatible with the existing OCSP, which was enabled by state legislature and is overseen by OPUC. OPUC has established an overall program size of 161 MW-AC for the OCSP. As stated in the *Impact Assessment* section, the OCSP program carveout, which is available only to projects that demonstrate community leadership or that reserve 50 percent of capacity for low-income subscribers, has been underfilled to date with 37 MW-AC of program capacity remaining to be claimed by projects. ETO expects all or nearly all of this capacity to remain unallocated without significant outside investment, such as the Solar For All funding and program described in this proposal. ETO anticipates Solar For All funds will enable the remaining OCSP program capacity to be filled with projects that reserve 50 percent or more of their capacity for low-income customers.

The OCSP is one of few non-utility managed community solar programs in the country that has invested in a consolidated billing process based on a customer's existing utility bill — thereby avoiding the need for a customer to receive a separate or third-party bill for subscription charges. The unique design of OCSP's cashflow and payment mechanisms also ensure that a low-income customer can never accrue debt to a third-party community solar project manager for nonpayment (any underpayment is applied only to utility charges, the same as for customers that do not participate in community solar). This ensures that already at-risk customers can safely participate in the program without being exposed to additional risks. Finally, OCSP bill credit rates are set at a \$/kWh level that is based on and approximate to retail-rate net metering compensation.

COUTCS: Outside of IOU territories, there is no statutory or regulatory requirement for community solar. However, a number of the state's COUs have voluntarily pursued community solar, and several others are interested. The OSFAC does not intend to pursue statutory requirements for Oregon's COUs to offer community solar, but will support COUs who want to offer community solar to their customers through technical and financial assistance.

The availability of consolidated billing varies across COUs, depending on their unique policies and practices. To the extent practicable, BEF will provide technical assistance to COUs to assist with upgrades to billing software and practices to enable consolidated billing practices in COUs that deploy COUTCS projects.

Maximized deployment breadth and diversity: The core structure of the OSFAC is designed to provide benefits across the state, including organizations best suited for different regulatory frameworks. ODOE will provide incentives to single and multifamily housing across the entire state. ETO and BEF will foster the development of community solar within IOU and COU territories, working together on projects when appropriate. This will leverage existing relationships and expertise so that grant funds can be rapidly deployed across Oregon. Additionally, the OSFAC commits to delivering at least 40 percent of the benefits to DACs, in accordance with the goals of the Justice40 Initiative. While IOUs serve 74 percent of the state's population and existing programs like OCSP present more streamlined opportunities for solar deployment, as shown below there is high overlap between the rural areas served by Oregon's COUs and the state's DACs. For this reason, BEF will prioritize engaging with these COUs and the communities they serve to ensure that geographic diversity and DACs are properly addressed with the program.

Program Strategy Narrative

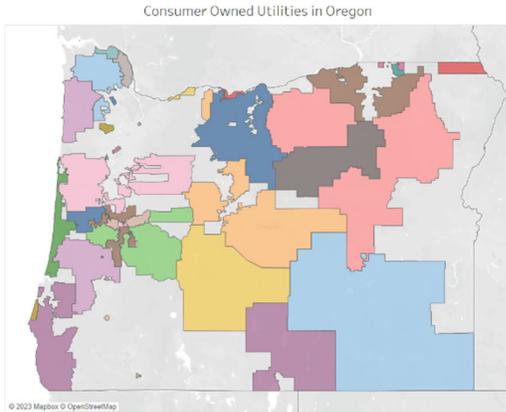


Figure 1: COU territories

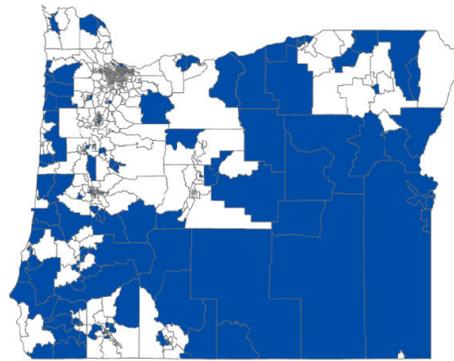


Figure 2: Disadvantaged Communities (CEJST)

Jurisdictional Differences in Community Solar: The OCSP provides substantial infrastructure to leverage funding community solar projects that serve low-income customers but is only available in IOU territories. In COU territories, a small number of utilities have already taken the initiative to self-organize COUTCS projects, but most have not. To ensure equitable access to community solar through the state, BEF will lead the engagement of and provide both technical and financial assistance to willing COUs to support the development of COUTCS projects. During the planning year, BEF will engage COUs to identify utility-specific plans to build COUTCS infrastructure outside of IOU territories.

Jurisdictional Differences in Single-Family and Multifamily Solar: As discussed above, Net energy metering policies are available throughout the state but with important differences between IOU and COU territories. OSFAC expects to fund onsite solar installations for households in both utility types. To ensure equity and parity for low-income households in IOU and COU service area, ODOE plans to offer higher levels of funding for single-family and multifamily solar installation in COU territories to provide equitable access for households that are not able to receive ETO incentives, which are funded by and available only to IOU ratepayers.

4. Financial Assistance Strategy: The OSFAC collaboratively designed this application to be efficient but still robust enough to deliver benefits to historically marginalized communities and maximize deployment within those identified communities. The financial assistance strategy will use the following types and sizes of financial assistance:

Single-Family: ODOE will provide rebates to support solar adoption in low-income single-family residences and DACs. Rebates provided under this program will be stacked with existing state and utility-funded financial incentive programs to fund a high percentage of, or potentially all, project capital costs to enable low-income and DACs to participate in the program with little to no amounts financed. ODOE will allow a maximum payment of \$18,000 for a rooftop solar installation per single-family household with Solar For All funds. The OSFAC anticipates serving a minimum of 3,581 single-family households with an average rebate of \$13,322.66 or less. During the planning phase, ODOE will evaluate precise tiers and qualifications methods, and consult with stakeholders in order to develop detailed qualifications and maximize the number of households served under this program.

Single-Family Projections	Annual in IOU	Annual in COU	Annual Totals	4 Year Totals
---------------------------	---------------	---------------	---------------	---------------

Program Strategy Narrative

Number of SF Households	730	165	895	3,581
Solar For All Incentives	\$9,052,000	\$2,871,000	\$11,923,000	\$47,692,000
Average Incentive	\$12,400	\$17,400	\$13,321.79	\$47,692,000

To determine this rebate amount, OSFAC members first established the cost of a typical 5kW rooftop solar system as \$20,000, based on historical data. Next, OSFAC members compared maximum rebates currently available in both IOU and COU territories. In IOU territory the projected funding gap is \$10,000 and in COU territories, the projected funding gap is \$15,000. ODOE then examined the underlying assumption that the existing incentives have no limit – and that is not true. ODOE anticipates the OSSRP is only capable of providing about 500 rebates annually to households that qualify for Solar For All, so additional funds are required to fully leverage the existing ETO incentive. ODOE increased the average incentive cost by \$2,400 to offset the limitations of OSSRP.

This initial plan is also premised on the assumption that OSSRP will be re-funded by the Oregon Legislature each biennium. OSSRP is currently only funded through June 30, 2025. The Oregon legislature has continuously funded the program since its inception over the course of three biennial cycles; however, this is not guaranteed to continue.

Lastly, ODOE is aware of federal tax credits that may be available to homeowners. However, because the OSFAC intends to prioritize low-income households, who may have little to no federal tax liability, ODOE is not depending on the tax credit to be available as part of the funding stack for single-family households. In addition, the initial investigation of the residential tax credit applicability shows that a highly subsidized project may have its tax credit basis reduced to the point of minimal tax credit value to the homeowner. However, ODOE is committed to exploring strategies during the planning phase, which includes methods to monetize the Income Tax Credit. If successful, these strategies will reduce the cost per participating household and expand the offerings to a greater number of households.

These assumptions create uncertainty in the precise resources that will be available over the period of performance. To mitigate these assumptions, ODOE will seek to develop strategies to stretch federal, state, and utility program funds to increase volume in the low-income program and facilitate benefits that extend beyond the period of performance, as discussed in more detail later in this section.

Multifamily: ODOE will provide rebates to multifamily projects that qualify for this program. ODOE proposes a stacked incentive strategy to incentivize property owners to install solar systems on multifamily properties and share benefits with tenants, particularly those who are low-income or reside in a DAC. Solar For All funds will be used in coordination with existing state- and utility-funded financial incentive programs to reduce capital costs. ODOE will permit a maximum Solar For All solar installation rebate based on a rate of \$1 per watt in a multifamily project. ODOE anticipates an average per-project grant of \$180,000 in IOU territory and \$210,000 in COU territory (assuming a 40-unit complex). In addition, some multifamily projects will also be eligible for storage rebates up to \$80,000 per project. This multifamily approach is anticipated to serve 3,320 households in 83 projects, 40 of which are anticipated to include storage.

Program Strategy Narrative

Budget Summaries	IOU Territories	COU Territories	Annual Totals	4 Year Totals
Number of Multifamily Projects	17	4	21	84
Number of Storage Projects	7	3	10	40
Fed Incentive Budget Solar	\$ 2,988,000	\$871,500	\$3,859,500	\$15,438,000
Fed Incentive Budget Storage	\$420,000	\$180,000	\$600,000	\$2,440,000
Total Incentives Budget	\$3,408,000	\$1,051,500	\$4,459,500	\$17,838,000
Number of Households	664	166	830	3,320

ODOE does not expect that multifamily incentives will need to cover the full system cost for the funding to be successfully deployed. Instead, the incentive only needs to be great enough to entice multifamily owners to make these additions on their buildings. The table below demonstrates the typical incentive stack ODOE anticipates for a 120kW PV system installed in a 40-unit multi housing development.

Incentive Stack	IOU Territories	COU Territories
Project Cost	\$360,000	\$360,000
OSSRP Rebate (Solar)	\$30,000	\$30,000
Ratepayer-funded incentive through ETO	\$45,000	\$ -
Estimated Federal Tax Credit (30%)	\$94,500	\$108,000
Anticipated EPA Incentive per project	\$180,000	\$210,000
Total Incentives per project	\$ 349,500	\$348,000
Incentives percentage of total cost	97%	97%
Solar For All Incentive per household	\$4,875	\$5,625
Funding Gap to be filled by owners	\$10,500	\$12,000

ODOE will provide financial support for the installation of battery storage systems on select multifamily projects. Low-income households and DACs are disproportionately vulnerable to extended power outages. For a low-income family, the loss of groceries in the refrigerator may have a more severe impact on a low-income household than a moderate-income household. Deploying storage on multifamily residences is a cost-effective method of delivering resiliency benefits. To receive storage rebates, Multifamily projects will be required to demonstrate how battery storage will benefit the residents in a meaningful way, such as backup power for shared refrigerators and common gathering spaces with air conditioning and filtration.

Community Solar in IOU Territory: ETO’s approach to supporting OCSP projects is built around leveraging the existing program infrastructure and project developers of the OCSP. To maximize benefits and access for customers, the first strategy focuses on financial assistance for private sector-led projects that can quickly scale and maximize the number of low-income households served. A second strategy provides deeper financial and technical assistance to community-led projects that provide deeper benefits to low-income and disadvantaged customers.

The existing OCSP program infrastructure provides a safe and efficient mechanism for community solar projects to receive on-bill subscription payments from subscribers, including low-income subscribers, while allowing participants to retain significant net savings. The program’s bill credit was designed by OPUC to be set at a level that would allow a 2-3 MW project

Program Strategy Narrative

to be financially sustainable solely through subscriber revenues and the monetization of federal tax credits and depreciation, while meeting the program's minimum requirements of 10 percent low-income participation. Currently, OCSP projects that would meet the additional 50 percent low-income participation requirement for both Solar For All and the OCSP carve-out are generally not financially viable without additional funding support because program rules require projects to provide 40 percent bill credit savings to all low-income participants. Because of these existing program dynamics and the traditional financing sources available to community solar developers, it is not necessary for ETO to fully-fund OCSP projects. Instead, ETO's intended financial assistance strategy is based in meeting the revenue shortfall that a typical 1.5-3 MW-AC OCSP project would experience by increasing the share of project capacity provided to low-income customers from 10 to 50 percent of project capacity. Project incentive levels would be calculated primarily to compensate projects for the lower amount of subscription revenue they are permitted to collect from these low-income participants (providing an upfront incentive equivalent to the lifetime incremental change in subscription revenue), with additional funding provided to offset expected cost increases related to paying prevailing wages during project construction and other program requirements.

This strategy will make use of the base financing mechanics of OCSP and will also leverage subscription payments (both from low-income and non-low-income customers) to finance most of a project's capital costs. The value of the upfront payment needed to incentivize private-sector developers to increase low-income capacity can be directly calculated from OCSP bill credit values and average system production values — and is roughly \$0.50/watt of total project capacity, assuming projects use incentives to increase low-income capacity from 10 to 50 percent of project capacity.

Additionally, ETO intends to reserve additional financial assistance to support smaller-scale community-led projects. Supporting these projects is critical to achieving specific outcomes related to community control and ownership of community solar projects, and to providing a pathway for low-income and DACs to realize their own goals and objectives related to community solar. However, these projects require deeper financial support because they are typically smaller and lack economies of scale and other efficiencies of larger projects, and the community organizations developing them need to cover their administrative costs as they build the technical capacity to develop and manage these projects. ETO also expects that community-led projects may be able to accommodate even larger percentages of low-income customers but will require additional financial support to do so. Based on ETO's incentive offers to community-led OCSP projects to date, a total incentive necessary to overcome these barriers and offer substantial household energy savings to an increased portion of program participants could be as high as \$1.44/watt. ETO intends to fine-tune these estimates, as well as any eligibility criteria that go beyond a low-income capacity requirement, and that relate to community control of projects through a small-scale OCSP incentive offer that ETO plans to issue in early 2024. ETO expects community-led projects that take advantage of this additional incentive offer to amount to a small share of the OCSP project capacity and financial assistance that is deployed through Solar For All, but for this to represent roughly half of the incentivized OCSP project count and to command the greatest amount of technical assistance.

This two-pronged approach to supporting OCSP strikes a balance between cost-effectively supporting large amounts of low-income households participating in OCSP and receiving substantial household energy savings, while also prioritizing and resourcing community-led

Program Strategy Narrative

initiatives that satisfy program objectives related to community leadership, control, and potentially ownership.

The table below demonstrates the total planned incentivized program capacity, capacity subscribed by low-income customers, the expected funding required, and the expected number of households served.⁴

Project Size	Large, Private Sector Led	Small, Community Led	Total
Targeted Total Project Capacity (MW-DC)	36.5	4.1	40.5
Expected Low Income %	50%	65%	NA
Total Low-Income Capacity (MW-DC)	18.3	2.6	20.9
Project Incentive \$/W	\$.49	\$1.44	NA
Total Project Incentive Budget (\$MM)	\$17.77	\$5.84	\$23.61
Expected Avg. Project Size (MW-DC)	1.7	.2	NA
Expected Project Count	22	18	40
Expected Low-Income Households Served	3,951	373	4,324

Community Solar in COU Territory: BEF will provide rebates, grants, and/or forgivable loans ranging from 40-60 percent of a project’s cost depending on the incentives available to the project. The average system size is projected to be 500kW, and the total amount of low-income COUTCS capacity to be 13 MW DC. BEF anticipates supporting up to 25 COUTCS projects during the performance period. By assuming that a 5kW subscription is needed to reduce household costs by 20 percent, the COUTCS projects could serve 2,596 low-income households at \$8,927 per household during the program term.

COUTCS will likely occur at multifamily and offsite locations. The ability of associated storage to serve residences in each scenario varies and can be directly serving residences when sited on a multifamily facility. When sited as a standalone offsite community solar project, the ability of the project and associated storage may be less clear or applicable. In addition, the capacity and duration of the storage may or may not be able to serve an entire distribution circuit during a grid outage. The criteria to determine when storage is a justified expense will be developed during the planning period and will include stakeholder input as well as advisory committee approval as to the priorities and budget allocations.

Financial Assistance	Amounts	\$/watt	Additional Incentives	Project Capacity	Avg. Subscription Size (kW)	Households Served
Solar Installation Rebates/Subsidies	\$14,800,000	\$1.90	\$40%	12,982	5	2,596
Enabling Upgrades Rebates/Subsidies	\$2,200,000					
Totals	\$17,000,000					

⁴ Note that, while OCSP program capacity is managed in terms of MW-AC, budget and impact numbers shown in the table and elsewhere are displayed in expected MW-DC to align with other OSFAC program components.

Program Strategy Narrative

Workforce Development Participant Support Costs: ODOE will dedicate \$3.5 million for grants for workforce training, of which at least \$350,000 will be used by grantees for participant support costs. During the planning phase, ODOE will determine appropriate funding ratios to support participants in different workforce training activities eligible for funding under these grant opportunities, along with precise types of participant support costs under this grant program. This process will be informed by reviews of existing workforce programs that offer similar participant support costs within the state.

The above targets are appropriate given the characteristics and needs of the communities. Approximately 63 percent of all households in Oregon are owner-occupied.⁵ Around 24 percent of people who own their homes pay more than 30 percent of their monthly income on their mortgage and utilities. In contrast, roughly 48 percent of renters in Oregon pay more than 30 percent of their income toward their monthly housing costs including utilities — this illustrates the need for significant investments in OCSP and COUTCS projects.

Approximately 74 percent of Oregon’s population resides within IOU territory. ETO projects that 4,324 low-income customers will be able to benefit from OCSP within these boundaries. This is a relatively high number of beneficiaries for the award amounts and represents only a small portion of the potentially eligible population within IOU territories.

The OSFAC will use the planning phase to further evaluate existing resources to ensure the financial assistance strategy complements, and does not unnecessarily duplicate, existing sources of capital and financial assistance. ODOE will accomplish this by ensuring that single-family and multifamily incentives are aligned closely with other available resources within the state. The OSFAC is working closely with other state agencies including those who provide funding statewide through Low-income Weatherization Assistance Program (WAP) services and the Low-income Heating Assistance Program (LIHEAP). During the planning phase, ODOE will work closely with stakeholders to develop a coordinated approach to customer acquisition and financial assistance delivery.

This will also facilitate longer-term planning to support program longevity and market transformation beyond the program period in the application. During the planning phase, the OSFAC will seek opportunities to braid newly available financial resources into the financial assistance strategy. This will include exploring how renewable energy credits, tax credits, debt financing, leases, power purchase agreements, other third-party ownership options, revolving loan programs, green bonds, guarantees, or other financing products made available from sources such as the National Clean Investment Fund and the Clean Communities Investment Accelerator may be integrated into long-term efforts. For example, the projects that will be supported through the OCSP will likely leverage traditional debt financing strategies. To support community-based projects that may lack access to traditional sources of capital, ETO plans to support projects in engaging with regional lenders, including those that may be selected through the National Clean Investment Fund and Clean Communities Investment Accelerator competitions, as well as national participants in U.S. DOE’s Community Power Accelerator to identify suitable sources of capital. ETO also plans to provide technical assistance in utilizing Elective Pay as a strategy to monetize tax credits for projects owned by nonprofit entities.

⁵ 2016-2020 ACS

Program Strategy Narrative

Additionally, ODOE and ETO have engaged with a regional Clean Development Financing Institution (CDFI) and have begun researching strategies for tax credit monetization for single-family installations at low-income households. This research will continue into the planning phase so projects, particularly those developed by community-based organizations, can receive expert technical assistance on project financing options. ODOE’s strategy for deploying onsite solar at single-family homes is to combine Solar For All funding with existing in-state funding to provide systems at little to no cost for households. However, ODOE is committed to fully exploring options for strategies that would enable tax credits to be leveraged, which would allow Solar For All dollars to serve additional households.

During the planning stage, ODOE will explore four potential options that would allow reductions to the per-household Solar For All spending in the single-family market and allow increases to the number of homes served and also to support energy storage or enabling upgrades at a greater share of households. These options are:

Strategy to Explore	Potential Result
Traditional Third-Party Ownership	If ODOE determines that TPOs are an appropriate strategy based on structures developed by other states, an incentive to third-party developers may enable more households to be served within existing budget.
Alignment with other funding resources	ODOE will identify additional funding sources that have potential for alignment with Solar For All rules, and where practicable, may be leveraged to support common objectives. This has the potential to increase the number of households that may be served within existing budget.
Low-Income Financing	Many stakeholder groups, including representatives of low-income households and DACs, have discouraged the use of financing for solar installations, however on bill financing for energy efficiency is currently deployed in Oregon effectively. During the planning phase, ODOE will explore whether a financing program, such as an on-bill payment system would be appropriate for low-income households, which hold the potential to deploy resources to more households.
Non-Profit Direct-Pay Partnerships	Non-profit entities may be able to serve as TPOs for low-income solar installations and monetize federal tax credits through Elective Pay. If ODOE determines that a private sector approach to TPO is not desirable for customer service or customer protection reasons, we may explore a potential strategy of partnering with one or multiple local or regional non-profits to provide such a service.

Additionally, the OSFAC will further evaluate considerations while developing prudent criteria for using financial assistance for storage. Financial assistance for storage is largely expected to be deployed in a multifamily setting. However, during the planning phase, ODOE will conduct stakeholder outreach and engagement to determine appropriate criteria for deployment of storage in a single-family setting. At this time, ODOE is interested in exploring scenarios that may include facilities that are at the end of distribution lines and extra vulnerable to outages, residents who reside in Public Safety Power Shutoff areas, residents with critical medical needs for resilient power, and in certain scenarios where more than just the resilience value can be accrued, such as participation in a utilities demand side management program.

Program Strategy Narrative

During the application development, the OSFAC learned of various resources throughout the state that can support enabling upgrades and for that reason, will implement a prudent strategy of only deploying enabling upgrades in BEF's COUTCS efforts. This funding will not exceed 20 percent of all financial assistance, in accordance with program requirements.

As part of the development of the enabling upgrade strategy, the ODOE will consider other sources of capital including other assistance programs at the federal, state, and local level, as well as a plan to refer customers to DOE's Weatherization Assistance Program (WAP), or other local, state, and federal programs for energy efficiency financial assistance. ODOE identified several possible avenues for coordination with the state agency that provides WAP and LIHEAP funding throughout Oregon. These avenues for coordination include identifying single-family households recently served by the program who received new roofs within the last five years as possible candidates for the single-family program. Other avenues for coordination in the multifamily space include providing financial offerings to multifamily developers to integrate solar and potentially storage into new developments. Oregon has set ambitious housing development goals in Governor Kotek's Executive Order 23-04 set a target of developing 36,000 new homes a year. This goal represents a nearly 80 percent increase in housing development from the existing baseline. Within this context, new housing, including affordable multifamily developments, are expected over the next five years.

The OSFAC has considered the long-term impacts of program financial assistance and will integrate housing affordability considerations that maintain affordability of existing housing stock, anti-displacement policies, and policies that prevent rapid cost increases for low-income and disadvantaged households and communities. ODOE's single-family program strategy is aligned with housing affordability objectives – by providing fully-funded solar installations to low-income households, we will maximize household energy savings and support wealth-building for program participants. ODOE will provide valuable long-term resources to low-income and DACs and will cautiously adopt policies, so low-income households are not placed in financially precarious positions as a result of their participation in Solar For All. ODOE commits to coordinating closely with other state agencies, the governor's office, and others charged with addressing Oregon's housing issues so that efforts are aligned.

ODOE will explore the four strategies outlined above that could assist with the long-term/lifetime operations, maintenance, and recycling of the assets funded under the program. The single family and multifamily assets are anticipated to have lifespans of 25 years or longer; however, ODOE recognizes grant funds will only be available for a five-year period of performance. For that reason, ODOE will continue to explore each of the four strategies to create long-lasting resources that support solar technologies within Oregon.

During the period of performance, ODOE and ETO will conduct onsite audits of assets to ensure operations and maintenance is performed correctly, building on the processes and practices of current in-state programs. For example, ETO regularly contracts with professional service providers for onsite verification of appropriate installation practices for incentivized systems prior to payment and has budgeted to support installation verification for projects receiving Solar For All Funding that also receive ETO incentives. In the OSSRP, ODOE selects a random sampling of completed projects for inspection throughout the year. These onsite inspections benefit the contractors and the customers by providing quality control and assisting with ensuring corrective

Program Strategy Narrative

measures are taken when problems are identified. Successful installation and operations of projects will also be monitored as part of the programmatic evaluation to validate the household's savings calculations.

5. Project-Deployment Technical Assistance Strategy: The OSFAC developed a coordinated plan to address the market barriers defined in the *Impact Assessment*, as well as the *Distributed Market Solar Strategy* with *Project-Deployment Technical Assistance*. The OSFAC plan has letters of support as provided in *Attachment K*.

ODOE's dedicated funding to invest in the skilled workforce needed to deploy solar, including expanding participation from workers in low-income and DACs in the solar industry is part of the technical assistance plan. This three-part investment strategy is outlined in depth in the *Meaningful Benefits Plan* included in this application.

By leveraging the soon-to-be-established Clean Energy Advisory Work Group, ODOE will work with a broad array of stakeholders in this area, including the existing public workforce system, community-based organizations, organized labor, private industry, and industry associations that are leading efforts to create training programs within solar and associated occupations. ODOE attended a state-led meeting this summer to learn more about existing state workforce efforts in the clean energy and construction industry. To the extent practicable, ODOE will coordinate with similar workforce funding delivered through the workforce system, including other state agencies, which oversees the state's allocation of Workforce Innovation and Opportunity Act funding, and registered apprenticeships. Under Oregon's Future Ready investments in 2022, other state agencies have issued grant opportunities within Oregon to support workforce development within the skilled trades and construction industry.

With the expert advice provided from the Clean Energy Advisory Work Group and in consultation with other workforce programs operated by state agencies, ODOE will provide grant funding opportunities to support local workforce programs that present a plan to train and place workers in high-quality, long-term careers. ODOE is particularly interested in prioritizing applications that promote high road, worker-centered workforce training models, including one or more Registered Apprenticeship programs, pre-apprenticeship (apprenticeship readiness) programs affiliated with Registered Apprenticeship programs, Labor-Management Training Partnerships or other union-affiliated training programs, and training programs in partnership with local community colleges or Minority Serving Institutions. ODOE recognizes existing workforce programs recruit and retain participants from low-income and DACs and have significant expertise in this area. ODOE will provide dedicated funding to support training in occupations needed to implement the OSFAC's four pathways to deploy solar technology. This dedicated funding will offer \$3.5 million in competitive grant opportunities to Oregon based employers, local governments and special districts, and non-profit organizations to grow the solar workforce. Additionally, participants in these training programs will be supported with wrap-around supportive services (e.g., childcare, transportation), case management, and on-the-job support and mentorship tailored to different communities dispersed through the state. ODOE intends to dedicate at least \$350,000 for the provision of wraparound supportive services.

A major component of OSFAC's project deployment technical assistance strategy includes the opportunities for business to access services provided by the OSBA, which will prioritize select businesses for services of the OSBA that are most aligned with the goals of the OSFAC. Solar

Program Strategy Narrative

developers may be included as possible recipients of support under the OSBA. The OSBA contractor will be selected following Oregon's procurement requirements.

OSFAC understands that internal business operations are not the only barrier to solar implementation. In fact, a more significant barrier is the current lack of technical assistance available to project developers, which includes community-based organizations that seek to design and develop OSCP and COUTCS projects. As described in the *Impact Assessment* and *Distributed Market Solar Strategy*, ETO and BEF will make significant efforts to provide solar developers and communities with technical assistance to address interconnection challenges. In Oregon, interconnection issues vary based on whether the project is located in IOU or COU territories and the size of the project seeking interconnection.

ETO and BEF will devote substantial resources to addressing interconnection challenges in both IOU and COU service territories. The OSFAC's technical support related to interconnection will heavily focus on community solar projects, as the interconnection process for single-family and multifamily projects present relatively fewer barriers.

In IOU territories, ETO will utilize the program planning period to hire dedicated staff to help projects navigate project development and the interconnection process, and will develop a specific technical assistance program design that addresses known historic barriers. For example, many potential sites for community solar in Oregon are in remote areas and can incur substantial interconnection costs if developers are not aware of the dimensions and capacity of the local distribution network. OPUC and partner utilities have developed tools and resources for developers to use in identifying locations that are better candidates for community solar development, but these tools can be challenging to use for less sophisticated developers.

Additionally, OSCP projects interconnect through their utility's Small Generator Interconnection Procedures (SGIP) procedures, which were designed for larger projects that are considerably more complex than the procedures for onsite connections that many contractors in the state are used to navigating. Most OSCP projects, including those managed by professional solar developers, have encountered substantial delays in project development due to interconnection challenges and setbacks. As part of the OSCP Program Administration team, ETO staff have recently begun joining utility-developer coordination calls to support projects in navigating these processes.

Finally, project developers often have difficulty working with utility staff to identify lower-cost alternatives to potential engineering solutions, because developers lack the expertise to understand and propose alternative solutions that satisfy detailed utility interconnection requirements. In the past, ETO has been successful in supporting MW-scale renewable energy projects through interconnection processes by funding independent engineering experts to support project developers in their utility engagements. ETO plans to hire at least one full-time employee to provide technical assistance to community-led projects. This internal resource may be supported by engineering firms who can advise on system designs and interconnection applications, and support key conversations with utilities. ETO staff also will engage OSCP administration partners, including OPUC, utilities, and project development stakeholders, to identify opportunities for more direct engagement in the interconnection and development process for community-led projects.

If ETO determines that community stakeholders are interested in supporting community solar projects but are not equipped to identify project sites and pursue project development, ETO is prepared to play a more direct role in community solar project development. One potential concept that ETO may develop during the planning phase to serve as a "matchmaker" by offering

Program Strategy Narrative

a series of competitive procurements to identify and select: 1) project sites that are suitable for community solar development; 2) current ETO trade ally contractors capable of developing community solar projects at these sites; 3) a suitable entity to own and manage the resulting community solar projects; 4) an interconnection engineering resource that can take direct responsibility for submitting and managing OCSP interconnection requests; and 5) community-based organizations representing DACs that are able to conduct outreach to and recruit low-income community members to participate in the program. ETO would work with local lenders to provide the necessary project financing to enable this concept, with subscription revenues providing the necessary long-term project revenues.

In COUTCS projects, BEF will be able to address interconnection challenges related to financial barriers for studying interconnections as well as direct utility support. However, BEF members will not be able to offer solutions related to interconnection issues involving grid limitations on remote COU distribution lines, which may limit the capacity and siting of COUTCS projects. BEF will work with contractors to provide specific technical and financial assistance to approved projects wishing to explore COU interconnection studies.

In addition to technical assistance related to interconnection, all OSFAC members intend to expand capacity for community-based outreach, provide direct management of existing programs, deliver customer service, and provide quality assurance across the OSFAC's various contractor groups, including ETO's network of trade ally contracts that install low-income solar projects.

ETO and BEF will ensure community solar projects funded under the program are efficiently deployed and resilient by providing solar developers and communities with technical assistance across a wide variety of issues. At a minimum, this technical assistance will cover issues related to project siting, land-use, permitting, building codes, inspection, and quality control. ETO and BEF will be able to access resources previously developed within Oregon to assist developers in this process. These resources include the Oregon Renewable Energy Siting Assessment (ORESAs) tool, launched by ODOE in 2022. The ORESAs tool is a collection of information about locations for current and future renewable energy and transmission development, designed to build an understanding of the opportunities and constraints that come with specific locations. Developers and other interested parties can now use the report and mapping tool developed under ORESAs to understand the opportunities and constraints related to renewable energy growth and economic development. Oregon's land use laws have long included comprehensive land use requirements. These land use considerations, such as zoning requirements, climate hazards, and various agricultural and ecological considerations, are included as data layers in the ORESAs tool, specifically developed for Oregon. This tool also includes limited information about military uses of Oregon's land, sea, and air space, sufficient to alert a renewable energy developer of a potential conflicting use, along with a military contact for more information pertaining to a particular site.

During the program planning period, ETO and BEF will incorporate feedback and recommendations from the solar industry, housing providers, and solar developers to determine what types of technical assistance will be most valuable in various sectors to better meet the needs of communities. The Technical Assistance strategy will highlight resources that are publicly available such as NREL's Multifamily Affordable Housing Screening report, SolarAPP+, and REopt. The DOE SolSmart program can assist local governments in siting and permitting new solar projects. These existing tools will help in providing baseline information and assistance to new and existing solar developers, and when more tailored assistance is required, ETO and/or BEF will customize support for community solar projects. This support will enable projects to evolve

Program Strategy Narrative

beyond the conceptual phase into a financially viable project with key risks mitigated. For COUs, this will be particularly important as they span a wide geography with varying land use constraints and widely varying permitting environments, and some have little to no solar experience to date. The OSFAC members may also leverage efforts under the Resilient and Efficient Codes Implementation grant award to update and educate building officials on energy related building codes and to ensure that post-construction inspection and quality control processes are robust to protect consumers.

The OSFAC will deploy specific technical assistance resources across the pathways, customized for the needs of the financial assistance delivery method.

Single-Family and Multifamily: ODOE and ETO will collaborate in providing technical assistance to customers and developers engaged in single-family and multifamily solar projects funded by Solar For All. ETO will leverage its existing trade ally network infrastructure to ensure a consistent level of quality and customer standard of care across sites in this area. Trade Ally status is a requirement for a project to receive ratepayer-funded incentives through ETO that may be paired with Solar For All financial assistance. Any solar contractor may become an ETO trade ally, but they must agree to certain customer service and solar installation standards, among other requirements. Furthermore, Energy Trust's Solar Within Reach incentive for low-and-moderate income customers is only available to trade allies that perform highly across a set of objective quality metrics to ensure a positive experience and quality installation for vulnerable customers. ETO will leverage this existing program infrastructure to expand availability of technical assistance to trade ally contractors, and also to ensure quality installations for participating households.

OCSP: ETO's technical assistance will be deployed through a mix of in-house, sub-awarded, and procured expertise. First, ETO will hire at least one FTE focused on providing technical assistance to community solar projects (described above). In addition to providing focused support on interconnection issues, this internal resource will help projects navigate issues such as site selection, land use issues, IRS elective pay, and other shared issues. Second, ETO will substantially scale its existing Community Solar Development Assistance (CSDA) offer. CSDA currently offers between \$5,000 and \$20,000 to OCSP projects, based on project size and prioritizing small community-led projects, to fund early-stage project development activities such as siting, feasibility assessments, project planning activities, and other early-stage project development activities undertaken either by internal staff or third-party experts. This early-stage funding has been a critical initial support for every community-led project that has submitted an OCSP project application to date. With additional funding, ETO can dramatically scale the support offered to community-led projects in early stages, providing grants or forgivable loans that mitigate risks in early-stage project development activities for community-led projects. Third, ETO will scale its community-based program implementation efforts by sub-awarding to and partnering with community-based organizations, consistent with EPA Subaward Policy, to support community outreach and education in DACs, and to also build capacity to pursue and develop OCSP projects. This builds upon ETO's long history of collaborating with community-based organizations, most recently through its Community Partner Funding model, which funds nonprofit partner organizations and provides them with offers of customized programming to the communities they serve, such as the National Renewable Energy Lab-supported Solar Ambassadors program.

COUTCS: Projects in Oregon's 38 COU territories will require individualized technical assistance and project-by-project evaluations to ensure project designs will deliver the minimum

Program Strategy Narrative

benefits required under this program. BEF's individualized approach is necessary because utility specific characteristics will result in different energy values, incentives available, and type of customers enrolled in the program.

BEF will procure a dedicated technical assistance provider to support both the program administration team and individual COUTCS projects. This provider will assist with preparing a projection of low-income savings or equivalent non-financial benefits. Depending on the subscription breakdown, the low-income subscriber portion could be fully subsidized, with no upfront cost, with the other project participants shouldering some of the low-income costs. This model has been successfully deployed in many COUTCS projects and creates a diverse and robust subscriber pool to ensure the outcomes of a program are met.

BEF will expand on the strong foundation of collaboration built formally and informally with COUs, which includes more than 20 COUs over the past year alone – and many of these collaborations have been focused on solar technology. Specifically, BEF will provide technical assistance such as financial modeling, tax credit analysis, grant writing support, outreach services, and deployment support. Under the OSFAC program, COUTCS projects will be able to access tailored support to overcome barriers such as lack of capacity, lack of expertise, financial barriers, challenges with billing system integration, and project siting. BEF can engage with the managers of COUs at regular utility meetings at the same time and solicit input and feedback on how to best structure a COUTCS program in their communities.

All projects may be subject to random inspections by the OSFAC after completion as part of the compliance effort to ensure that projects are actually built to match the description and confirm with all applicable licensing, permitting, and safety standards.

6. Equitable Access and Meaningful Involvement Plan: The OSFAC plans will maximize access to the program for low-income and DACs. The OSFAC is strategically structured with members that currently serve the entirety of Oregon in the five identified pathways proposed. This coalition-style approach allows each of the members to provide customized support within their regions and areas of expertise. This approach is both diverse and inclusive of numerous communities and voices from around our state. Our commitment to equitable access and meaningful involvement is strong – OSFAC engaged in three different methods to elicit feedback from stakeholders with a focus on representatives of environmental justice and community-based organizations. While OSFAC recognizes there is significant work that will need to be performed during the planning phase to ensure equitable access and meaningful involvement from communities, we have secured support from environmental justice and community-based organizations that will be instrumental in advising our approach and guiding us as we seek to better understand the barriers low-income households and DACs face in accessing the benefits of solar technologies. This is demonstrated by letters of support included in *Attachment L*.

As part of application development, the OSFAC members had individual conversations with stakeholders. The OSFAC members also held a two-hour webinar in August 2023, presenting information about the application concept and seeking feedback through an electronic portal. ODOE also coordinated a meeting specifically with leaders from environmental justice and community-based organizations that work in Oregon to provide information and seek feedback on how to best structure this program.

The OSFAC will maximize the breadth and diversity of the communities served throughout Oregon, while still prioritizing low-income and DACs. All financial assistance distributed in pursuit of installing solar technologies for single-family residences, multifamily residences, OCSP, or COUTCS projects will be focused primarily on serving low-income households, though

Program Strategy Narrative

members of DACs that are not low-income may be served in specific program components. However, some aspects of the OSFAC program design will provide benefits to all Oregonians seeking to benefit from solar technologies. For example, OSFAC efforts to provide consumer education or workforce training is done so to support OSFAC objectives — but benefits will accrue to a broader base of Oregonians.

Oregon has many dimensions of diversity, and this program will serve all types of communities and households. These include rural, suburban, and urban communities; communities with limited English proficiency; as well as households who do not own their property, including owners of manufactured homes on leased sites and households who do not have space for residential rooftop solar.

Oregon's two large mountain ranges divide the state into three distinct regions. Portions of Oregon's coasts receive significant rain and are classified as rainforests. Crossing the coastal mountain range are inland valleys. Approximately 2/3rds of Oregon's population resides in the Willamette Valley. Across the eastern Cascade Mountain range, Oregon's landscape changes dramatically into high desert, plains, and buttes. This diverse landscape poses challenges that may be unique to certain regions. Oregonians also speak diverse languages. When appropriate, OSFAC members will translate program materials and customer outreach and educational materials for the intended audience base, and all coalition members have budgeted appropriately for translation services. In Oregon, other than English, Spanish is the second-most spoken language by those with limited English proficiency, representing roughly 128,300 individuals in Oregon. This is followed by Vietnamese, Chinese, Russian, and Korean.⁶

OSFAC also intends to serve families that live in diverse housing arrangements. The five-pathway approach is strategically intended to be flexible enough to meet the needs of low-income households and DACs where they are. Pragmatically, OSFAC members acknowledge that not every house is a candidate for an individual solar installation. Some homes cannot support a rooftop installation, others may be shaded all or most of the day by numerous trees or large buildings. Fortunately, multifamily projects, OCSP and COUTCS projects can be designed to service these households where a rooftop solar installation is inappropriate.

Oregon is home to nine federally recognized Tribes. In the process of preparing this application, ODOE sent a government-to-government letter to the chairs of the nine Tribes, inviting formal collaboration on this program. This effort to engage and serve Tribal communities will continue into the planning phase of the project, if awarded. To the extent practical, the OSFAC members intend to develop funding priorities to support deployment of solar technology in low-income households and Oregon's nine federally recognized Tribes. The OSFAC members will further explore methods of prioritization methods during the planning phase, in tribal consultation, to develop models that will provide benefits to Oregon's nine federally recognized Tribes. All OSFAC members have experience supporting Tribes with energy programs and this effort will build upon those pre-existing relationships.

Workforce availability also varies by geography. Workforce training facilities and instructional expertise focused on renewable energy are largely located in the more densely populated Interstate-5 corridor. Through conversations with stakeholders, the OSFAC identified

⁶ See, <https://www.oregon.gov/languages/pages/most-common-state-language.aspx>

Program Strategy Narrative

the need to expand workforce development opportunities in rural areas of the state to support solar deployment.

Throughout the life of the program, ODOE will continue to meaningfully engage with stakeholders and offer opportunities for participatory governance, where interested parties can weigh in on the design of the program. This participatory governance structure will be developed in the first three months of the planning phase and will be robustly implemented during the subsequent nine months of the planning phase. Periodic opportunities for additional participatory governance will occur in the three months following the release of the annual programmatic evaluation, detailed in the *Reporting Plan* section of this application. This effort to evaluate the program, produce a public report, and engage stakeholders will strengthen the program and its design year-by-year. As the prime recipient and overall grant manager, ODOE will ensure these opportunities are provided to stakeholders from diverse audiences.

ODOE may elect during the planning phase to provide modest and prudent participant support costs to individuals or provide sub-awards to community-based organizations who support this work on behalf of the community interests they represent, based on the level of involvement sought under this participatory governance structure. This includes considerations for effective engagement with Tribes and/or other environmental justice organizations, who operate on limited budgets and staff capacity. This would be in addition to the sub-awards provided to community partners envisioned as part of the community solar technical assistance described above.

The OSFAC members will use different methods to provide education, outreach, and community engagement on programmatic offerings. ODOE will develop unified educational materials designed for general usage among the OSFAC members. However, specialized materials will be developed by different members to engage diverse audiences. These materials may be web-based, paper materials, audio-visual materials, or education offered through in-person meetings and conversations. Where appropriate, ETO and BEF intend to offer contracts or subawards to trusted, community-based organizations to facilitate outreach and engagement with certain populations, including those with limited English proficiency. This approach will be carefully crafted during the planning phase, so that agreements are compliant with 2 C.F.R. Part 200.331 and the *EPA's Subaward policy*, as well as *EPA's Guidance on Participant Support Costs*. The diversity in outreach and educational materials OSFAC intends to create corresponds to our commitment to serving all of Oregon. In some rural communities, the community bulletin board at the local grocery store represents the most efficient means of sharing news of a new program. In other communities, web-based applications, podcasts, or social media may be the primary means of educating household and communities about the benefits provided by solar.

The OSFAC will implement a robust strategy for customer acquisition and management for the program. All OSFAC members acknowledge that existing programs do not serve low-income households and DACs to a satisfactory extent. Therefore, OSFAC members have started strategizing tactics to support a strong customer acquisition strategy, so the benefits of solar technologies can be brought to scale for low-income and DACs. Described below are initial concepts that will evolve during the planning year.

Single-Family: ODOE will work with other state agencies to identify households that received roof upgrades or repairs within the last five years. ODOE plans to use partnerships to acquire customers and plans to coordinate with existing need-based federal, state, Tribal, or utility assistance programs (e.g., WAP, SNAP, TANF, Lifeline, LIHEAP). Identified households may be candidates for a single-family solar installation and could assist with the initial customer base to

Program Strategy Narrative

launch the program. The program will also leverage ETO's existing customer care and call center infrastructure to support participants in learning about and understanding the program's offers. ETO will also hire an additional FTE on its customer care team specifically to ensure quality customer care by trade ally contractors and that any issues or disputes that may arise when serving vulnerable populations are speedily and appropriately addressed.

Multifamily: In addition to coordinating with the existing OSSRP applications, ODOE intends to work with state agencies which support the development of new affordable housing projects. By leveraging other programs, developers of new affordable housing projects can be rapidly identified for potential multifamily projects.

OCSP: ETO will leverage the existing infrastructure of the program to acquire and manage customers. The OCSP funds a low-income facilitator (LIF), which is a designated community-based organization charged by OPUC with recruiting low-income participants on behalf of participating projects. The LIF's current outreach approach focuses on engaging non-English speaking households and other underrepresented groups to participate in the program. The OSFAC team has engaged the OCSP LIF and confirmed its ability to support expanded low-income recruitment in OCSP and to align recruitment with EPA customer eligibility requirements using existing program funding, without the need for EPA funding to support these efforts. ETO does plan to further support the enrollment of low-income and DAC members through the community partner funding model described above, wherein roughly five community organizations would receive funding to hire a staff person dedicated to outreach and education to targeted populations, as well as to directly pursue community solar project development. All subawards will be made in accordance with EPA's subaward policy.

COUTCS: BEF will leverage their extensive partnership network and collaborative relationships with COUs to identify potential projects that could be realized with the provision of financial and technical assistance. These identified projects will be offered various support to both identify customers and manage projects.

Workforce Development: ODOE intends to replicate similar models for grant making used by other state agencies after the 2022 legislative passage of Oregon's Future Ready funding. Future Ready provided \$200 million primarily designed to be dispersed as grant funds to support and expand on existing workforce development programs in the state. ODOE will seek lessons learned from other state agencies to identify recipients who can rapidly and successfully deploy workforce programs to foster growth of the solar industry.

Also cognizant of the Justice40 initiative, all OSFAC participant recruitment efforts, including any provision of contracts or subawards to organizations to assist with recruitment, will be conducted in a manner that is mindful of the Justice40 Initiative. When appropriate, priority will be given to entities that demonstrate strong ties to DACs identified by the Climate and Economic Justice Screening Tool (CEJST) or EJ Screen's Supplemental Indexes.

In order to reduce waste from fraud and abuse, the OSFAC members will use different methods, including categorical eligibility or other tools that minimize burdens on households.

Single-Family: Currently, ODOE's existing OSSRP model permits two methods by which a household may become income-qualified to participate. The first option is to provide documentation that shows household eligibility for LIHEAP, the Oregon Energy Assistance Program, WAP, SNAP, Medicaid, or CHIP. The second method is for the household to provide a tax transcript from either the IRS or Oregon Department of Revenue from one of the previous two tax years. ODOE anticipates deploying a similar model for Solar For All.

Program Strategy Narrative

Multifamily: The incentives currently available for multifamily low-income service providers are determined eligible if they are eligible for public assistance. The OSFAC will consider similar requirements during the planning phase.

OCSF: Within the OCSF, participants can self-attest to income levels in a manner approved by OPUC. During the OCSF program design process, it was determined that alternatives to self-attestation would be unduly restrictive and counter to the objective of forming an easily-accessible program for low-income households. However, the role of the OCSF LIF in managing the program's income verification process is designed to minimize the risks of improper enrollment. The nature of income verification is not made public by the program, and as part of the enrollment process, the LIF collects income information through an intake phone call with the customer, which builds trust and minimizes the risk of fraud. Project managers are not permitted to provide their own records of income eligibility self-attestation in lieu of the program-controlled process. The OCSF also accepts categorical eligibility, such as a household residing within an affordable housing property. These existing OCSF program resources will be used to enroll participants in projects supported by Solar For All, and ETO will engage OCSF program implementation partners to adapt customer intake and verification processes to ensure that customers enrolled in these projects satisfy both OCSF and SFA household eligibility requirements.

COUTCS: Income-qualification methods will be similar to the above methods when operating within COUTCS projects. Many of the same dynamics and programmatic services are offered across utility territories except for the self-attestation method currently in operation by the OCSF. The distinction within COUTCS projects is the strong overlay with DACs defined by the CEJST tool, and the ability of the OSFAC to utilize this specific geography in eligibility criteria. BEF will strive to acquire community solar participants that are categorically eligible, have provided income verification, or, when infeasible, reside with the defined DACs and self-attest to their income eligibility.

7. Program Planning Timeline and Workplan Narrative: Based on past experience implementing similar programs, the OSFAC has developed the preliminary implementation timeline. This timeline is detailed more fully on *Attachment D: Project Timeline and Workplan*. The plan includes numerous activities to be refined during the planning phase, after robust stakeholder engagement. The OSFAC identified the following milestones indicative of clear and reasonable progress for development of the program during the planning phase. Each of the OSFAC members are also estimating for the implementation of Build America, Buy America as well as the Davis-Bacon Act, based on forthcoming guidance. The OSFAC members have specifically built in this capacity by estimating budgetary needs for implementation, including estimations based on domestic material expenses, prevailing wages for workers, and dedicated resources and staff time for ensuring compliance with federal requirements. ODOE will procure a Davis-Bacon Act tracking software tool for use across the OSFAC members by the end of month nine, ensuring that Davis-Bacon tracking tools will be available prior to the deployment of multifamily or community solar rebates, which are likely to require such compliance.

The OSFAC members will also coordinate with relevant stakeholders and partners including local and/or state governments, utilities, community-based organizations, state-level assistance programs, and labor organizations during the planning phase. Key milestones include: 1) Development of participatory governance framework at the end of month three; 2) Develop criteria for single-family by the end of month six; 3) Develop criteria for Multifamily rebates, including storage by the end of month nine; 4) Complete development and planning work for

Program Strategy Narrative

OCSF payment eligibility by the end of month 12; and 5) Complete development and planning work for COUTCS payment eligibility by the end of month 12. ODOE intends to implement a phased grant approach with ETO and BEF. This will enable ETO and BEF to operate their grant funded activities with no substantial involvement from ODOE, other than to ensure compliance with grant terms and conditions. Following the planning year, the specific outputs and outcomes obtained will align with the logic model and other terms and conditions negotiated with U.S. EPA. ODOE will engage in regular reporting to ensure milestones established in the future are achieved.

To the extent practical within Oregon, each of the OSFAC members will adopt best practices related to residential rooftop and residential-serving community solar projects. During the planning phase, the OSFAC members will generate a list of best practices and prioritize the best practices that are expected to maximize value to low-income residents and DACs within Oregon. This will assist with leveraging existing technical assistance resources during program planning and implementation. Many of these technical resources are expected to be of a financial nature, related to entity structures that may monetize tax credits, provide low-cost financing, or other financial resources that can be braided to support program implementation. The OSFAC welcomes technical assistance and additional resources.

2. Program Administration Narrative: The OSFAC will deploy and manage funds efficiently, responsibly, and transparently. In demonstration of that commitment, ODOE offers the following commitments across a spectrum of budgetary, financial monitoring stewardship, and reporting practices to be used during the life of the grant.

1. Budget Narrative: ODOE budgeted for all necessary expenses for project implementation, ranging from expenses for program administration, project deployment technical assistance, and financial assistance strategies. The description below details how all expenses will be expended in a timely and efficient manner. All expenses are expected to be cost-effective, allowable, and reasonable in furtherance of the grant objectives. The prime applicant on behalf of the OSFAC, ODOE will implement procedures and controls required under state policies and procedures, including those contained in the Oregon Accounting Manual to comply with federal requirements, including provisions of the Uniform Guidance, EPA regulations, as well as Generally Accepted Accounting Principles. OSFAC members will all have a role in program administration, technical assistance, and distribution of financial assistance. The OSFAC approach meets the requirements of providing at least 75 percent of financial assistance under this program. The narrative below aligns with the Budget provided in *Attachment E*.

Personnel

Title	% of Time	Total Cost	Year 1	Year 2	Year 3	Year 4	Year 5
Assoc. Dir.	.20 FTE	\$131,537	\$23,266	\$25,135	\$26,367	\$27,683	\$29,086
Manager	.50 FTE	\$298,478	\$52,791	\$57,031	\$59,901	\$62,838	\$65,917
Program Analyst	1.0 FTE	\$471,991	\$83,583	\$90,336	\$94,650	\$99,330	\$104,092
Program Analyst	1.0 FTE	\$471,991	\$83,583	\$90,336	\$94,650	\$99,330	\$104,092

Program Strategy Narrative

Community Liaison	1.0 FTE	\$495,038	\$87,719	\$94,650	\$99,330	\$104,092	\$109,247
Solar Rebate Assistant*	1.0 FTE	\$241,869	\$0	\$56,340	\$59,053	\$61,766	\$64,710
Senior Policy Analyst**	█ █	████████████████████			█	█	█
Energy Policy Analyst**	█ █	████████████████████			█	█	█
Incentives Analyst**	█ █	████████████████████			█	█	█
Community Navigator**	█ █	████████████████████			█	█	█
Community Equity Analyst**	█ █	████████████████████			█	█	█
Total		\$2,214,405	\$434,443	\$413,828	\$433,951	\$455,039	\$477,144

* Position is not anticipated to start until Year 2 **Position is only involved in Year 1 to assist this planning and training grant specific staff.

This award will support 4.70 new FTE at ODOE after grant-specific staff are hired. 1.0 FTE from existing employees will provide support to the planning phase during the first year, but existing employees will transition away from the project after grant-specific staff are onboarded and appropriately trained. This best practice allows for rapid implementation,

Increases for each position are based on an assumed increase of 6.55% on January 1, 2025, in alignment with recently announced increases for state employees — and thereafter, structured annual step progressions as required by the state. ODOE employees positively time keep for federal grants using project cost account codes on a monthly basis. This method ensures accurate reporting and grant expenditures. At the end of each month, ODOE allocates each employee’s paid leave to each project cost account code, proportionate to time worked. This provides an equitable basis for distribution of paid leave across various grants. Paid leave is considered wages within Oregon’s system, and correspondingly fringe benefits are distributed under the same proportions.

Fringe

Rate	Basis	Fringe Benefits Total	Year 1	Year 2	Year 3	Year 4	Year 5
51.5%	\$2,214,405	\$1,140,419	\$213,121	\$223,485	\$234,345	\$245,729	\$213,121

ODOE does not have a federally approved Fringe Rate, however, fringe benefits are a component examined in the agency’s negotiated indirect cost rate. The agency uses the biennial agencywide average fringe rate from the agency’s budget for budgeting purposes only, which during the 2023-2025 biennium is 51.5%. Actual costs for fringe benefits, based on individual employee costs incurred each month, are charged to each individual funding source based on the employee’s time charged to each fund source. The Fringe Benefits are comprised of the following

Program Strategy Narrative

class of costs: Employee Relations Board (\$2.19 per month); Public Employees Retirement System (17.92% of Wages); Pension Obligation Bonds (4.75% based on Salary); Social Security (7.65% based on Salary); Workers Compensation (\$1.91 per month); Medical/Vision Benefits (\$1,650 per month); and Paid Family Medical Leave (PFMLI) (.4% based on salary).

Travel

In-State Travel								
Purpose	# of Trips	# of Staff	# of Nights	Ground Trans. per trip	Lodging Costs per trip	Per Diem per trip	Average Cost Per Trip	Total
Compliance Inspections	90	2	2	\$168	\$284	\$276	\$728	\$65,520
Outreach Events	60	1	2	\$197	\$196	\$162	\$555	\$33,300
Subgrantee Monitoring	50	2	2	\$168	\$284	\$276	\$728	\$36,400
Coalition Meetings	15	2	0	\$59	\$0	\$112	\$171	\$2,565
Total In-State Travel								\$137,785

ODOE anticipates 10 Compliance Inspection Trips in Year 1, and 20 Compliance Inspection Trips for each year following. All other travel types are expected to be evenly divided across the five-year period. ODOE anticipates 12 outreach trips, 10 subrecipient monitoring trips, and 3 OSFAC meetings to occur annually, requiring in-state travel.

ODOE's travel estimates are based on current state travel requirements contained in the Oregon Accounting Manual, which primarily uses GAS rates. Because precise locations of projects sites are unknown at this time, ODOE selected 10 cities across Oregon and averaged travel costs across these locations to arrive at trip averages. ODOE employees are also expected to access the state motorpool vehicles, which is often more cost effective than a GAS mileage payment on a cost-per-mile basis. State motorpool rates were used for mileage costs cited above based on 10 cities across Oregon.

Out-of-State Travel								
Purpose	# of Trips	# of Staff	# of Nights	Airfare per Trip	Lodging Costs per trip	Per Diem Per Trip	Cost Per Trip	Total
Professional Development	5	2	2	\$2,132	\$1032	\$395	\$3,560	\$17,800
Total Out-of-State Travel								\$17,800

ODOE anticipates staff attending one national conference per year for professional development. While precise conferences have not been identified, for estimating purposes, ODOE based estimates on conferences occurring in Washington, D.C. ODOE will follow standard GAS payments for travel as required by the Oregon accounting manual.

Equipment – No equipment will be purchased by the prime applicant under this award.

Program Strategy Narrative

Supplies

Item	Purpose	Total
Personal Protective Equipment	Compliance Site visits	\$1,000

ODOE anticipates personal protective equipment, such as hard hats, vests, and other materials may be needed for some site inspections and estimates an annual cost of \$200 for such items.

Construction – No construction will be undertaken by the prime applicant under this award.

Contractual

Purpose/Activities	Year 1	Year 2	Year 3	Year 4	Year 5	Total Cost
Davis-Bacon Compliance Software	\$20,000	\$40,000	\$40,000	\$40,000	\$40,000	\$180,000
Development and maintenance of common rebate application system	\$90,000	\$7,500	\$7,500	\$7,500	\$7,500	\$120,000
Rebate software subscription and volume cost fees	\$0	\$78,000	\$78,000	\$78,000	\$78,000	\$312,000
Oregon Solar Business Accelerator	\$0	\$200,000	\$200,000	\$200,000	\$100,000	\$700,000
Media-based program promotion	\$0	\$20,000	\$20,000	\$20,000	\$20,000	\$80,000
Translation services	\$79,695	\$79,695	\$4,950	\$4,950	\$4,950	\$174,240
Third-party Compliance Reviews	\$0	\$100,000	\$100,000	\$100,000	\$100,000	\$400,000
Total						\$1,966,240

As a state agency, ODOE will comply with state procurement requirements, as required by 2 C.F.R. Part 200.317. ODOE anticipates conducting procurements during the planning year to secure contractors and develop software and resources necessary to implement the program. ODOE anticipates the need for Davis-Bacon tracking software, which ODOE will administer for the OSFAC. Additionally, ODOE anticipates the need to enhance current rebate processing systems to meet grant specific terms and streamline rebate applications. Ongoing costs for the existing rebate processing subscriptions are also projected based on current rates. ODOE also intends to procure a contractor to establish and operate a Oregon Solar Business Accelerator to help solar businesses grow and expand. To supplement outreach efforts, ODOE also expects the need for program promotions through media such as internet, radio, or tv, as well as translation or interpretation services. ODOE also intends to secure services from a third-party CPA firm to assist with compliance-related reviews. Estimates are based on a rate of \$200 per hour for 500 hours a year in years 2-5.

Other

Other expenses, excluding subawards and participant support costs
--

Program Strategy Narrative

Purpose	Entity Name (if known)	Year 1	Year 2	Year 3	Year 4	Year 5	Total Cost
Subaward/RF P Reviews and consultations	Or Dept. Of Justice	\$17,580	\$35,160	\$35,160	\$17,580	\$17,580	\$123,060
Printing Costs	N/A	\$2,000	\$2,000	\$1,000	\$1,000	\$1,000	\$7,000
Total							\$130,060

ODOE anticipates reviews of sub-awards, procurements, and general consultations with the legal counsel, with the Oregon Department of Justice, as required under state law. Estimates are based on the current attorney rate of \$293 per hour, which is subject to adjustment. ODOE also anticipates printing costs for each year. ODOE estimates printing costs of .10 cents per page, with the largest printing volume to occur in the first two years as the program launches.

Other expenses, subawards and participant support costs only						
	Year 1	Year 2	Year 3	Year 4	Year 5	Total Cost
1	\$1,911,183	\$9,114,085	\$9,061,055	\$9,078,028	\$9,065,202	\$38,229,553
2	\$2,785,650	\$3,783,918	\$4,700,497	\$7,119,496	\$5,875,874	\$24,265,435
3	\$0	\$875,000	\$875,000	\$875,000	\$875,000	\$3,500,000
4	\$0	\$11,926,346	\$11,926,346	\$11,926,346	\$11,926,346	\$47,692,000
5	\$0	\$3,859,500	\$3,859,500	\$3,859,500	\$3,859,500	\$15,438,000
6	\$0	\$600,000	\$600,000	\$600,000	\$600,000	\$2,400,000
Total					\$131,524,988	

ODOE anticipates the following additional items under “Other.” This includes:
 Item 1 – Subgrant to coalition member ETO totaling \$38,229,553 for purposes described in this narrative; Item 2 – Subgrant to coalition member BEF totaling \$24,265,435 for purposes described in this narrative; Item 3 – Workforce development subawards (recipients TBD) totaling \$3,500,000 as described in this narrative; Item 4 – Participant Support Costs Single-Family rebates totaling \$47,692,000; Item 5 – Participant Support Costs Multifamily rebates totaling \$15,438,000; Item 6 – Participant Support Costs Storage rebates totaling \$2,400,000.

Financial Assistance Designation

As a subset of the Other category, ODOE has identified the following expenses as Financial Assistance (FA) as described by EPA. ODOE classified expenses as FA if the expense is a participant support cost (other than workforce development), or subaward benefiting a specific project site.

Item	Financial Assistance
Financial Assistance delivered by ETO	\$24,505,550
Financial Assistance delivered by BEF	\$17,000,000
Participant Support Costs: Single-Family Rebates	\$47,692,000
Participant Support Costs: Multifamily Rebates	\$15,438,000
Participant Support Costs: Storage Rebates	\$2,400,000
Total	\$107,035,550

Program Strategy Narrative

This provides 77 percent in Financial Assistance under the proposal, well within the requirements for award option #1.

Indirect Charges

Personnel & Fringe Benefits are the Base	Indirect Rate	Year 1 Indirect	Year 2 Indirect	Year 3 Indirect	Year 4 Indirect	Year 5 Indirect	Total Indirect
	46.11%	\$303,487	\$289,086	\$303,144	\$317,875	\$333,317	\$1,546,909

ODOE negotiates a federally approved indirect rate on a fixed rate with a carry-forward basis, every two years, aligned with the agency’s biennial budget. The current provision rate request spanning from July 1, 2023 to June 30, 2025 is currently under review with the U.S. Department of Energy’s Richland Field Office, ODOE’s cognizant agency. The provisional rate request is 46.11 percent. ODOE’s indirect rate uses Personnel and Fringe Benefits as a base on which the rate is applied across all funding streams.

2. Fiscal Stewardship: The OSFAC members will implement program controls to manage taxpayer funds ethically and efficiently. As the prime recipient, ODOE will provide the policies and controls for program oversight. All OSFAC members operate for public benefit. As a state agency, ODOE helps Oregonians make informed decisions and maintain a resilient and affordable energy system. Energy Trust of Oregon is organized as a 501(c)(3) non-profit organization whose mission is to help customers and communities reduce costs and achieve additional benefits by saving energy and benefiting from renewable resources. The Bonneville Environmental Foundation is also a 501(c)(3) non-profit that has a long history of advancing renewable energy through innovative financing approaches and directly addressing barriers to implementation.

As a state agency, ODOE has existing policies and procedures in place to reduce waste, fraud, and abuse, including policies and controls for program oversight. ODOE will also procure services of a third-party firm to conduct compliance related risk assessments and/or various compliance-based reviews to assist the agency in ensuring strong internal controls, proper administration, and minimizing the risk of waste, fraud and abuse. Current practices include risk assessments of all subrecipients and appropriate controls respective to the risk determination for each subrecipient, which may include financial and onsite monitoring in accordance with the requirements for providing oversight of pass-through funds under 2 C.F.R. Part 200.302 and 2 C.F.R. Part 200.332. ODOE employs practices such as monthly budget-to-actual grant reporting, and supports transparent performance tracking and strong procurement practices to provide for strong internal controls. State-specific policies that align with federal requirements for grant compliance can be found in Chapter 30 of the Oregon Accounting Manual.⁷ Oregon also protects confidential whistleblowers through a reporting hotline directly available on the homepage of the Oregon Secretary of State’s office. This site clarifies that the office investigates both state agencies and reports of other entities who receive either state or federal funds from the state and provides information to potential reporters about whistleblower protections.⁸ Oregon’s efforts to investigate claims of misuse of resources supplements federal reporting avenues available through the US EPA or US DOL that may have applicable oversight on program components.

⁷ See, [Department of Administrative Services : Oregon Accounting Manual : Statewide Accounting & Reporting Services : State of Oregon.](#)

⁸ See, [State of Oregon: Audits - Report Misuse of State Government Resources](#)

Program Strategy Narrative

ODOE will ensure that all subrecipients comply with the US EPA's policy on conflict of interest through incorporating all necessary requirements into performance. The OSFAC members will also ensure that procurement, conflict of interest, and appropriate financial management and reporting are incorporated into project monitoring on all funded projects. ODOE budgeted sufficient staff time and resources to conduct samplings for site specific compliance, as well as subrecipient monitoring on an annual basis to monitor oversight of grant progress and compliance.

The OSFAC is also committed to investing in policies and practices that support consumer protection. Given the purpose of these funds is to serve low-income and DACs, the OSFAC is mindful of the importance for strong consumer protection standards that will be necessary for successful project deployment. The OSFAC is acutely aware that historically DACs may be distrusting of programs such as Solar For All. Strong consumer protections will help build trust and demonstrate that participants experience direct benefits from the program.

Each OSFAC member will develop a plan detailing how program partners and entities receiving Solar For All Funds will interact, transact, or contract with consumers. This plan will cover education and outreach, sales and marketing of solar products or services, consumer purchasing, and leasing and financing materials. All aspects of services will be required to comply with applicable consumer protection laws, including laws prohibiting unfair, deceptive, and abusive practices, the Consumer Protection Act, Fair Debt Collection Practices Act, and Regulation Z.

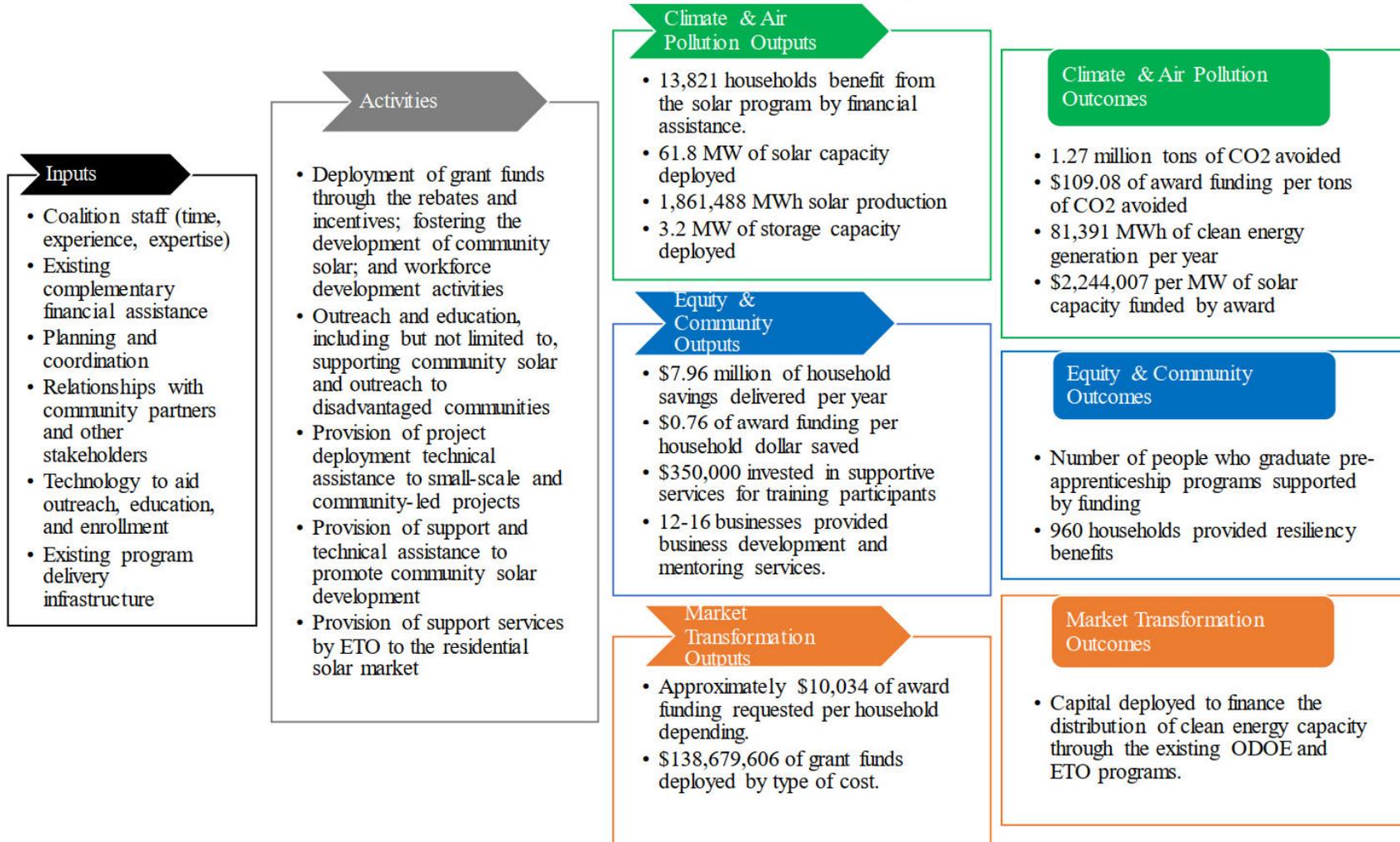
To that end, each OSFAC member will carefully screen entities expected to directly interact, transact, or contract with consumers in the program. This will include requirements for contractors to participate in the program. If a particular contractor is found to be in violation of the program standards, they will be removed from further participation in the program. To support consumer protection, ODOE will test random samples of transactions and sites will be selected for physical inspections to confirm that: customers are not charged illegal upfront or cancellation fees; customers experience transparent and verifiable subscription payments, where applicable, and billing processes; and have accessibility if they have limited English proficiency. ODOE will use a judgmental auditing method at least annually. These transaction tests will also ensure that consumers are not exposed to predatory lending programs under the Solar For All program. Loan products will be limited to only those products that the program develops. Where appropriate, ODOE will consider methods to support consumer education campaigns about solar technology and available programs, as well as warnings about predatory practices that may exist within the state. ODOE will implement appropriate guardrails to ensure household savings materialize for program beneficiaries by performing audits or spot-checks of bills. For the duration of the grant, random samplings will not only be done to recently completed projects, but to a reasonable extent, a sampling will be pulled from projects completed at least a year prior.

The program will also undergo annual programmatic evaluations to determine programmatic strengths and weaknesses. This evaluation will evaluate the progress of the grant, as well as effectiveness in serving different customers, including customers living DACs, rural communities, tribal communities, and customers who speak a language other than English.

3. Reporting Plan: The OSFAC members are prepared to meet the anticipated reporting requirements described in *Section VI. C. of the Request for Applications*. ODOE will report collective results based on the outputs and outcomes included in the logic model, shown on the next page.

Program Strategy Narrative

Oregon Solar For All Logic Model and Anticipated Reportable Metrics



ODOE will build program capacity to perform evaluation activities and detail a plan to publish data, evidence, and evaluation reports publicly during the program lifetime. This includes conducting an annual evaluation, which will assess programmatic performance and validate realization of household savings. As the prime recipient, ODOE is experienced in understanding complex federal award requirements, including reporting of subrecipients, and programmatic evaluation.

Program Strategy Narrative

Additionally, ODOE will leverage systems for financial management, performance reporting, and federal compliance expertise within the agency. Coalition members ETO and BEF are also applicants under other federal competitive grants and may be able to leverage common systems used by their organizations, if selected for awards. During the planning phase, all OSFAC members will construct robust reporting systems to comply with the requirements of Section VI.C of the Request for Application, Order 1000.33, as well as any requirements specific to the grant terms and conditions. During the application period, all OSFAC members reviewed the aforementioned reporting requirements and budgeted appropriate staffing to enhance each entity's capacity to execute ongoing reporting requirements.

3. Programmatic Capabilities and Environmental Results Past Performance: The Oregon Department of Energy, acting as the prime recipient on the grant, has demonstrated experience in managing and completing federal awards. ODOE has a robust history of implementing federal award programs as the long-term recipient of funds. As the State Energy Office, ODOE has continuously performed on and reported on federal grants for decades under two distinct federal programs: State Energy Program and Hanford Oversight and Cleanup grants.

As described in *Attachment F: Programmatic Capabilities and Environmental Results Past Performance*, ODOE implemented at least 11 federal award agreements over the last three years. Among the 11 agreements, ODOE served as the prime recipient on seven agreements and as a subrecipient on an additional four agreements. For the sake of conforming with the request for application guidelines, only five awards are detailed in *Attachment F*. ODOE has a strong history of meeting reporting timelines, and working proactively with federal project officers should an extension be needed. ODOE has or is currently in the progress of delivering performance metrics within the grants described *Attachment F*.

ODOE has organizational experience to plan for timely success of the objectives under the proposed project. ODOE has budgeted appropriately for staffing to support planning and implementation of this program, including facilitating and providing oversight to direct grant subrecipients. ODOE's staff possess the necessary expertise and qualifications to deploy funds provided to this program. Until grant funds are available, and specific project staff can be hired under this award, the principal investigator at ODOE will be Robert Del Mar. [REDACTED]

[REDACTED] Wendy Simons, also from ODOE's Planning and Innovation Team, will also support this program. [REDACTED]

[REDACTED]. Additionally, Jennifer Senner, [REDACTED] one of ODOE's Grants Officers, will assist with administrative and oversight of the grant. [REDACTED]

ODOE has experience in recruiting and hiring the skilled employees needed to successfully achieve the goals of the proposed program. ODOE has been in a steady growth trajectory, adding new positions as a result of past successes with both state and federal funds. The agency's human resources department is highly skilled at recruiting diverse employees that assist the agency in meeting programmatic goals and objectives.