ATTACHMENT C:

Greenhouse Gas Reduction Fund
SOLAR OPPORTUNITIES INDIANA
Indiana Community Action Association
Work Plan
Project Period: 5/1/24 – 4/30/29
Submitted: 10/01/24

Project Title: Solar Opportunities Indiana

Grant Number: 84089501

Organization Name: Indiana Community Action Association, Inc. (IN-CAA)

Geography: State of Indiana

Definition of LIDAC:

Greenhouse Gas Reduction Fund (GGRF) defines low-income and disadvantaged communities (LIDACs) as encompassing the following four categories: 1) communities identified as disadvantaged by the Climate and Economic Justice Screening Tool (CEJST), 2) a limited number of additional communities identified as disadvantaged by the EJScreen mapping tool, 3) geographically dispersed low-income households, and 4) properties providing affordable housing.

In alignment with the GGRF definition for LIDACs, the Solar for All Indiana coalition will identify beneficiaries for this project through multiple pathways. Households will be eligible if:

- The household resides in a community identified as disadvantaged by the CEJST and/or the EJScreen mapping tool
- The household's income falls under the 80% of the area median income (AMI) threshold – a pool of people which is larger than the population identified by the CEJST, provided by U.S. EPA.
- The household already participates in one of the following income-based or income-verified federal assistance programs, including: the U.S. Department of Health and Human Services' (HHS) Low Income Home Energy Assistance Program (LIHEAP), the U.S. Department of Agriculture's (USDA) Supplemental Nutrition Assistance Program (SNAP), the U.S. Department of Energy's (DOE) Weatherization Assistance Program (WAP), the Federal Communications Commission's Lifeline Support for Affordable Communications, the USDA's National School Lunch Program, the U.S. Social Security Administration's Supplemental Security Income (SSI), or any other verified government or nonprofit program serving Asset Limited, Income Constrained, Employed (ALICE) individuals or households designated by the EPA Administrator.
- The household resides in qualified affordable housing.

Introduction

With its historical dependency on fossil fuels, Indiana is a statewide traditional energy community and—as noted by the EPA—in a "prime position to benefit from solar deployment." Per the U.S. Energy Information Administration, in 2020, Indiana ranked third as the largest coal-consuming state[1] and 13th

[1]Total Consumption: Electric Power 2020. Coal Data Browser. U.S. Energy Information Administration

for overall climate vulnerability.[2] Traditional energy communities, especially those in the Midwest, are a high-priority focus for GGRF program objectives; considered against global emissions, the Midwest would be fifth largest emitter of greenhouse gas emissions.[3] In 2021, the Biden Administration's Interagency Working Group (IWG) on Coal and Power Plant Communities and Economic Revitalization identified a 17-county wide area of Southern Indiana as a priority area, one of only 25 communities across the country.[4] As succinctly stated by advocacy group, Evergreen Action: "Energy communities have paid a hefty price as sacrifice zones for extractive industries. Over the last century, they have disproportionately borne the brunt of pollution, including toxic coal ash exposure and groundwater contamination. Many community members have consequently suffered health problems such as cancer, thyroid issues, and liver damage."[5]

The coalition proposes an equity-centered, ecological systems-based approach to dismantling and disrupting the policies and practices impeding equitable access to solar-powered, affordable, clean energy. As noted by EPA in this funding announcement and addressed in EO 14091, the lack of equity around solar deployment is implicitly connected with systemic racism and environmental injustice in "underserved communities, many of whom have endured generations of discrimination and disinvestment."[6] According to a study by the American Association of Blacks in Energy, while Black households spent $41B on energy in 2009, they held only 1.1% of energy jobs and gained only 0.01% of the revenue from energy sector profits.[7] The Justice40 Initiative was designed to rectify this reality; this coalition-led, cross-sector program, **Solar Opportunities Indiana (SOI)** fully integrates Justice40 goals and requirements.

In convening municipalities, advocacy groups, post-secondary education institutions, faith-based organizations, and renewable energy experts, SOI will deliver a transformative solar financing and access program for Indiana. Aligned with the forward-looking spirit articulated in EO 14091, the coalition will leverage federal funds to "help bridge the gap between the world we see and the future we seek." Through Solar Opportunities Indiana, the coalition will address structural barriers that impede the market's growth, innovate within current policy constraints, reduce upfront costs and address financing gaps, and provide support for workforce development, small businesses, public outreach, utility coordination, and local policies, ordinances, and procedures for solar market participation. As a result, the coalition will transform and spur the Indiana solar deployment market, achieving equity in access and utilization of clean energy and greater resilience to climate change.

SECTION 1: PROJECT DESCRIPTION

1.1 Overview

The Solar Opportunities Indiana coalition consists of Indiana Community Action Association (IN-CAA); the cities of Fort Wayne, Gary, Indianapolis; Energy Matters Community Coalition, serving the city of

[2] The U.S. Climate Vulnerability Index.
[3] Kerber, B. (2021, Nov 19). The Midwest leads U.S. emissions, here's why. Fresh Energy.
[4] IWG. (2021, Apr). Empowering Workers Through Revitalizing Energy Communities. Altogether the 17 counties have pop. 134,635 within disadvantaged census tracts (representing 29.31% of total pop.).
[5] Evergreen Action. (2023, Jul 12). What Are Energy Communities and How Can They Benefit From the IRA?
[6] Office of the Federal Register. National Archives and Records Administration.(2023, Feb 16). Executive Order 14091-Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.
[7] How High are Household Energy Burdens (2014 study, cited in 2020, Sep study by the American Council for an Energy-Efficient Economy).

Columbus; Indiana Solar Equity for All Alliance, serving Indiana statewide; Earth Charter Indiana; Solar United Neighbors; Faith in Place; Citizens Action Coalition; and Indiana's green bank, Indiana Energy Independence Fund. After a year of planning, the coalition will collectively solarize at least 3,537 low-income homes, and 4,430 more by piloting and/or deploying community solar fields or microgrids, and transform Indiana's market by creating new financial products and incentives that jumpstart solar for LIDAC residents. In dialogue with utility companies, and in tandem with statewide workforce development already in progress, the coalition is committed to growing solar opportunities in Indiana from the grassroots upward.

1.2 Project Outputs, Outcomes, and Linkage to the U.S. EPA's Strategic Goals

Environmental Results - Outputs and Outcomes:

Five coalition members will implement solar projects with the following outputs and outcomes:

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Coalition Partners	Number of households served	MW solar capacity deployed over time (5 years) (all new generation)	Short tons annual CO2 emissions avoided over time (25 years)	Absolute annual household savings realized over time (25 years)	Workforce development outcome
Energy Matters Community Coalition, Inc.,	207 households for rooftop solar & 320 households for community solar	0.66 MW rooftop & 1.39 MW community	73,000 short tons	$14,888 per household	750 high school students will be exposed to solar-related career pathways
Fort Wayne	180 households for rooftop solar & 260 households for community solar	1.08 MW rooftop & 2 MW community	109,750 short tons	$25,605 per household	60 workers trained and placed in jobs over 4 years
Gary	Up to 200 households for rooftop solar & up to 2,100 for community solar	0.4 MW rooftop & 9 MW community	335,000 short tons	$14,729 per household	200 workers trained; 100 placed in jobs, either as workers, solar developers, related entrepreneurs

Indianapolis	Up to 750 households for community solar	5 MW	178,250 short tons	$25,467 per household	25 trainees engaged via apprenticeship or other workforce development programs
Indiana Solar Equity For All Alliance	2,950 households for rooftop solar & 1,000 households for community solar microgrids*	1 MW rooftop & 5.2 MW community*	221,000 short tons*	$5,996 per household*	150 workers educated on solar and other clean energy career opportunities and referred to opportunities; ensure that 50% of project contractors are MWDBE

**Indiana Solar Equity for All Alliance was not able to provide revised estimates for items with asterisks (*) in time for the resubmission of the workplan. Their outcomes will be finalized during the Y1 planning.*

To measure and report on the outputs, outcomes, and overall impact of the Solar Opportunities Indiana program, the Lead Applicant, IN-CAA, will hire a Data Manager to develop a comprehensive plan for data collection, analysis, tracking, and reporting and contract with an external evaluator using EPA-approved procurement methods. At the conclusion of Y1, the finalized plans for program evaluation and data collection/management will be included in the updated workplan. These plans will be integrated with the Quality Management Plan and the Quality Assurance Project Plan.

Linkage to U.S. EPA's Strategic Goals:

This award supports the following goals and objectives of the FY 2022-2026 EPA Strategic Plan.

- Goal 1: Tackle the Climate Crisis
    - Objective 1.1: Reduce Emissions that Cause Climate Change

SECTION 2: PROJECT DESIGN PLAN

2.1 Activities to be Conducted

Throughout the program's planning year (Y1), frequent in-person and virtual conversations and meetings will allow coalition partners and supporting organizations to engage in deeper, strategic conversations and lay the groundwork to ensure all funds are spent within the five-year award period. In collaboration with EPA program staff, program goals, plans, and strategies for Meaningful Benefits, Distributed Solar Market, Financial Assistance, Project Deployment Technical Assistance, and Equitable Access and Meaningful Involvement will be refined and fully articulated.

Y1 Planning and Refinement: Distributed solar deployment and associated financial strategies and technical assistance

- To provide the necessary technical assistance for Phase II cities, the coalition's Budget / Finance subcommittee will convene with representatives from South Bend, Evansville, Bloomington, Richmond, and Crawfordsville (see Letters of Support attached to original proposal) to finalize their Solar for All projects, determine appropriate targets, and create the necessary financial arrangements to support those projects.
- During Y1 planning, the Budget / Finance subcommittee will determine best practices and targets for the extended rollout of the smaller funding pool in Y3-Y5 to rural low-income and disadvantaged communities across Indiana (as detailed in *Impact Assessment (Section 1* of original proposal).
- The coalition's State Regulatory subcommittee will develop a utility coordination structure and work with utilities and the IURC to create efficiencies for program deployment, address need for grid upgrades, and refine financial subsidies with input from industry. The updated information on financial subsidies will be used to develop "stacked funding" models for solar installations.

Y1 Planning and Refinement: Workforce development and wraparound services

- To date, IN-CAA has done a preliminary review of the workforce development efforts of coalition members and their subrecipients and has arrived at a basic coalition wide-goal of **500 people trained for jobs created by Solar for All over five years.** In Q4 2024, the 15-member workforce development subcommittee will convene for the first time; it includes representation from workforce development government officials, universities, schools, equity advocacy organizations, philanthropy, etc. Once convened, and after adopting an equity framework for its work and mapping the LIDACs to be targeted, the coalition-wide workforce development subcommittee will refine strategies and target impacts for job training and apprenticeship programs and any necessary wraparound services that would strengthen job force numbers for Indiana and retain students and trainees via supports for childcare and transportation needs, case management, on-the-job support and mentorship. The workforce development subcommittee (with help from coalition partner Indiana Solar Energy for All Alliance's subrecipient Emerald Cities Collaborative, a non-profit that advances equitable economies), will first assess existing and effective solar workforce development efforts in Indiana so that Solar Opportunities Indiana has initial benchmarks, does not duplicate efforts, and makes the best use of award funds (i.e., rather than launch a brand new initiative, the coalition may determine that the best course of action is to support existing efforts).
- In clarifying its goals for workforce development, the subcommittee will consider strategies for targeting Indiana's small and minority- and women-owned businesses and HUBZones.
- As the lead applicant, IN-CAA staff will note and incorporate EPA guidance on Build America, Buy America and Davis-Bacon Act prevailing wage requirements. Subrecipients (and any of their subrecipients) will be required to meet these requirements as well.

Y1 Planning and Refinement: Customer acquisition through community engagement, outreach, and education

- The coalition's Outreach/Communications subcommittee will refine targets and strategies for maximizing customer acquisition through culturally appropriate and responsive activities and diverse and equitable channels.
- The subcommittee will also clarify what community engagement, outreach, and education efforts are planned at the subrecipient level; solicit feedback from organizations that submitted letters of support for community engagement, outreach, and education, and develop a

framework for a comprehensive website (and accompanying social media channels) that will include a data dashboard that serves as a real-time tracker of the project's outcomes and outputs.

- The coalition's Resident-led Advisory Board subcommittee will recruit a 12-member Advisory Committee—geographically and demographically diverse—which will participate in ongoing planning, design, delivery, and evaluation of the Solar Opportunities Indiana program. The location and frequency of these meetings will be determined during Y1 upon recruitment.

Coordinated Y1 planning phase

In July 2024, IN-CAA hired Alison Becker, M.B.A., J.D. to serve as the Program Director for Solar Opportunities Indiana. With an emphasis on stakeholder relationships, facilitation, project management, and process improvement initiatives, Ms. Becker has nearly 30-years' experience in government, non-profit, and investor-owned utilities. Specifically, as Manager, Regulatory Policy at Northern Indiana Public Service Company (NIPSCO), Ms. Becker managed the energy efficiency oversight boards, which included the representatives of the Indiana Office of Utility Consumer Counselor (OUCC), the Citizens Action Coalition, Inc. (CAC), and industrial customers. During her 15 years at NIPSCO, she also served as the Chair of the Indiana Demand Side Management Coordination Committee, a state-wide committee comprised of representatives from utilities, the Indiana Utility Regulatory Commission, the OUCC, CAC, industrial customers, and other stakeholders. As director of NIPSCO's Integrated Resource Plan, Alison gained extensive and invaluable experience in inclusion and collaboration in leading a public advisory process which convened more than 100 diverse stakeholders in both large-scale meetings and one-on-one sessions.

In the Y1 planning period, Alison will organize and lead coalition meetings and subcommittee meetings, attend EPA webinars, serve as the point of contact for EPA program officers, and work closely with IN-CAA's Executive Director and Business Manager to create the administrative, contracting, and accounting systems necessary for award management. In turn, the coalition will focus on project refinement in Y1, including the completion of feasibility studies, site readiness activities, and scope refinement for each of the proposed projects.

Commitment to best practices for rooftop and community solar

Noted throughout this workplan and in the submitted Letters of Support, the coalition has assembled a formidable group of supporting organizations, all vested in the success of Solar Opportunities Indiana. By leaning on these national and statewide technical experts in Y1 planning and beyond, the coalition will ensure that best practices in solar deployment, climate resilience, clean energy, and environmental justice are introduced and adapted, if necessary, for Indiana's low-income and disadvantaged communities. We will seek support from the Department of Energy's National Community Solar Partnership which offers technical and networking assistance to community partners as well as access to the Mobilize Platform for research and guidance on the emerging field of low-income community solar and equitable access to these resources. The coalition has already formed subcommittees for Equity and Justice and Community Solar Projects.

Meaningful Benefit Plan

Solar Opportunities Indiana will directly benefit low-income and disadvantaged people and communities in Indiana in a transformative, long-lasting way. The coalition's stated commitment to environmental justice and racial, economic, and social equity is included in the Memorandum of Agreement, which will

be signed by all coalition partners and integrated into each aspect of the coalition's work. In addition to deploying over 25 MW of residential-serving distributed solar to 7,967 low-income and disadvantaged households across the state, the coalition will deploy battery storage (connected to solar panel installations) in an amount to be finalized during the Y1 planning period; the cost of this storage capacity and percentage of the financial assistance it constitutes will also be finalized during the Y1 planning period. The coalition will also maximize household savings, improve access to solar energy, improve community resilience, build community ownership, and create workforce development resulting in well-paid jobs with opportunities for advancement for people who need these benefits the most.

Maximize household savings

Solar Opportunities Indiana will ensure all benefiting households (i.e., those with or without individual electricity bills) receive a minimum household savings of 20% over the five years of the program period; details on how these savings will be delivered, calculated, and measured will be provided at the completion of the Y1 planning period and will include an explanation of how savings will be delivered inclusive of any costs the program beneficiary incurs for participating in the program. By leveraging other financial strategies, the coalition hopes to achieve a zero-cost burden for most benefiting households.

Guided by IN-CAA's expertise in its decades' long weatherization program for low-income households, the coalition will leverage existing funds for energy audits and will use program funds for enabling upgrades such as roof repairs and replacements and energy efficiency improvements. These improvements will increase household savings above and beyond savings achieved by solar panels alone and will play a significant role in reducing energy burdens. In addition, the coalition will leverage local, state, and federal funds, including incentives, to achieve savings on solar installations (see Financial Assistance Strategy, pages 11-14). Apart from these direct savings vehicles, the coalition will educate residential customers regarding tax credits and energy rebates, any future proposed rate increases by IOUs or rural electric membership cooperatives (REMCs) and provide guidance on engaging with utilities and utility regulatory bodies. Finally, the coalition will work with EPA to refine estimates for household savings using various data, including electricity rates and consumption levels; solar photovoltaic and battery storage specifications; upfront costs, incentives, and loan terms; and any applicable discount rates to ensure household savings targets are achieved.

The coalition will ensure household savings are realized through a comprehensive annual evaluation, which will be conducted by an external evaluator. The need for this service will be included in a request for proposals (RFP) to procure this external evaluator in compliance with EPA requirements. The RFP will also include a requirement for recommendations for programmatic improvements. The coalition will also collaborate to develop robust strategies to ensure that households that do not have individual meters (e.g., multifamily buildings with master meters and/or rental buildings) will realize savings benefits during the Y1 planning period.

Provide equitable access via financial and project-deployment technical assistance

In addition to offering varied financing products, Solar Opportunities Indiana will increase access to residential distributed solar generation in low-income and disadvantaged communities via the program's financial assistance, which will reduce the high upfront costs of installation through bulk procurement and leveraged financing provided by other programs and close financing gaps using green bank financial products (see Financial Assistance Strategy, pages 11-14). In addition, Solar Opportunities

Indiana will utilize its project-deployment technical assistance to close awareness gaps among potential low-income and disadvantaged customers through extensive public outreach while working with utilities to address costly inefficiencies and providing technical assistance to local governments who wish to update building codes and to support more efficient installation processes (see Project Deployment Technical Assistance Strategy, page 16). Finally, the program will employ strategies designed to maximize the breadth and diversity of the communities served, remove barriers to participation, and meaningfully engage residents and communities (detailed in Equitable Access and Meaningful Involvement Plan, pages 19-23).

In accordance with EPA regulations at 40 CFR Part 7 regarding non-discrimination in EPA-funded programs, with the general terms and conditions of EPA grants, and with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and The Age Discrimination Act of 1975, IN-CAA and the coalition will prohibit discrimination on the basis of race, color, national origin, sex, disability, or age. The coalition will also prohibit such discrimination by pass-through entities, ensuring that all program income is expended and all program activities are conducted in a non-discriminatory manner.

Overarching goals to deliver energy resilience and grid benefits

Environmental Resilience Institute's (ERI's) mission is to co-create Indiana's environmental resilience and climate solutions by integrating research, education, and community. ERI's successful Resilience Cohorts program helps Indiana city, town, and county governments measure and reduce local greenhouse gas emissions and implement climate resilience strategies. As noted in the Budget Narrative, ERI will support the coalition in providing technical assistance, education, and outreach to Phase II cities and connecting with rural communities interested in solar installations.

In addition, Solar Opportunities Indiana will create capacity and/or critical facilities to deliver electricity to low-income and disadvantaged households in the event of a grid outage by:

- **Providing battery storage:** Battery storage is critical due to the end of net metering and the fact that the power grid serving most of Indiana is at "high risk of emergencies" during summer heat waves. However, battery storage can be cost prohibitive, so the coalition, which includes Indiana Energy Independence Fund (IEIF), Indiana's green bank, will collaborate to maximize the resources available in order to include battery storage for as many households as possible based on need. These products will leverage Solar for All funding as well as other components of the GGRF [Clean Communities Investment Accelerator (CCIA), National Clean Investment Fund (NCIF)], combined with other federal and local grant programs, to develop and implement direct loan programs where applicable and to facilitate maximum use of the Investment Tax Credit via bridge loans and other mechanisms (see Financial Assistance Strategy, pages 11-14).**Increasing energy efficiency and electrification improvements:** These improvements decrease backup energy needs while increasing safety during emergencies. The coalition will bundle upgrades and repairs, including electrification, with solar installations (detailed in Financial Assistance Strategy).
- **Creating resilience hubs:** Across Indiana, it is rare to find a community in which many households would be resilient to a power outage lasting more than a few hours. To address this issue, the coalition will create four microgrids across the state serving 1,000 residents and provide battery backup for households receiving solar energy through rooftop installations and community solar programs. These community solar installations will power energy efficient, community-serving facilities to offer resilience during natural disasters and blackouts.

- **Innovating creative solutions** through microgrids and virtual power plant-type installations across a few projects to build effective neighborhood resilience and compare relative outcomes for future development. SOI partners Energy Matters Community Coalition (EMCC) and the City of Gary will explore different styles of microgrids to best serve key disadvantaged homes.

By providing battery storage, creating resilience hubs, and innovating creative solutions such as microgrids, SOI will create new capacity to deliver power to low-income and disadvantaged households during a grid outage, ensuring that over 1,000 Indiana residents have backup power during a grid outage. In implementing this plan, the coalition will ensure that only allowable resilience technologies (e.g. community solar with battery storage, battery storage for households with medical equipment receiving rooftop residential solar) are provided using EPA funds; eligibility for battery storage will be determined during the coalition's customer intake process, to be more thoroughly developed during Y1 planning.

Financial assistance will be tracked, audited, and reported to EPA through the use of a software product such as Neighborly, which has a customized module for Solar for All awardees. This tracking, auditing, and reporting will ensure that the coalition avoids duplicating other federal funds and remains in compliance with all EPA guidance surrounding the deployment of Solar for All financial products. In addition, the community solar provided will deliver at least 50% of the power generated from the system to residential customers within the same utility territory as the facility by delivering at least 50% of the benefits derived from the power generated to these customers in the form of financial savings on electricity bills and/or renewable energy credits. To illustrate, coalition member EMCC will hold generated revenue in escrow to apply it to customers' bills in the form of credits, and coalition member Indiana Solar Equity for All Alliance (ISEFAA) will ensure residents save on their electricity bills through the solar arrays installed. The coalition will verify that all solar arrays comply with the EPA definition of community solar throughout the five-year program implementation period.

Maximize household and community ownership models and build project equity

To access the additional economic benefits of asset ownership, the coalition will pursue "no upfront cost" ownership models, including the option to develop and implement temporary third-party ownership models to fully leverage IRA "direct pay" opportunities. This will accelerate the timeline upon which low-income and disadvantaged households own the solar assets installed through the proposed program. Coalition member IEIF also will work with credit unions, CDFIs, utilities, and others to leverage financing that will maximize direct solar system ownership by residents. By stacking grant funding, rebates and tax credits (where available), and low interest loan products, the program will shield households from up-front capital costs while providing them cost effective means of realizing energy savings.

The coalition has designed a program in which community ownership of solar arrays is a key priority. In the City of Fort Wayne, community solar will be owned by the city government, which has a great deal of experience working with the local electric utility, Indiana Michigan Power, on similar projects. In the City of Indianapolis, IndyParks will most likely own the proposed community solar array, though conversations with the local utility, AES, are still ongoing. In the City of Gary, the City will own the community solar, which will be installed on city-owned property. In Columbus, EMCC has designed a project in which United Way of Bartholomew County or a nonprofit affiliate will be the owner of the solar arrays, and across the state, ISEFAA's partner Black Sun Light Sustainability will initially own the

solar arrays installed while ISEFAA works at the community level to incorporate cooperatives, which will eventually own the arrays. Individual households will also own many solar arrays installed.

Currently, Indiana does not have any enabling regulatory frameworks that proactively support community solar through deployment caps, carve outs, consolidated billing, valuation of power generation from community solar close to retail rates, or healthy net metering. In response, the coalition is collaborating with utilities and utilizing existing regulatory frameworks such as the Public Utilities Regulatory Policies Act (PURPA) and the Alternative Utility Regulation Act (AURA) to implement these projects.

To limit risks to communities and households when ownership pathways are offered, the coalition will:

- Ensure Solar Opportunities Indiana provides the highest quality equipment and warranties
- Follow up on solar installations with spot check inspections to ensure installations are completed property
- Include operations and maintenance plans, either as part of procurement or as a separate service (the coalition will decide which strategy is best during Y1 planning)
- Explore third-party long-term insurance products for solar panels
- Explore possibilities for the creation of an independent pool of funds for long-term operations and maintenance costs
- Create a resource page to share with customers, summarizing consumer protection policies, solar installer contact information, SUN's Solar Helpdesk (a free, national resource), and other helpful resources
- Educate customers on how to add panels to homeowner's insurance and how to file Indiana Form 18865 to ensure property taxes do not increase as a result of installing rooftop solar panels by deducting the value of the panels from the property assessment
- Ensure strong language and provisions are included in the bylaws and incorporation language for solar cooperatives; that responsible board leadership is elected for these cooperatives; and that the cooperative carries insurance for community solar installations
- Incorporate recommended provisions from the Coalition for Community Solar Access Recommended Best Practices for Community Solar Consumer Protection and related resources into SOI consumer protection policies and practices
- Ensure procurement documents align with consumer protection policies
- Help consumers distinguish between valid SFA support resources vs. "scam" offerings

<u>Investment in jobs and businesses in low-income and disadvantaged communities</u>

To ensure widespread and lasting benefits to low-income and disadvantaged residents and transform Indiana's community solar market, Solar Opportunities Indiana will develop—beginning in Y1 Planning—both a comprehensive, statewide solar-focused workforce initiative and a strategy to scale up services to local businesses and entrepreneurs to meet increased solar installation demand (detailed in Project Deployment Technical Assistance Strategy, page 16).

The coalition will engage with supporting organizations to develop a skilled solar workforce in Indiana. Rather than naming specific organizations at this time, and in addition to any project-specific efforts, the Coalition plans to work with its workforce development subcommittee to identify appropriate partners that can build on already-successful projects. These initiatives will identify low-income and disadvantaged students and workers and create pathways to job training and job placement in high-quality, middle-class solar energy industry jobs that pay family-sustaining wages and include strong

labor standards, including benefits, safe working conditions, and the free and fair choice to join or form a union in the communities where solar energy is being deployed. In doing so, the coalition will utilize worker-centered training models, including apprenticeships, and will partner with unions, solar developers, and contractors who have committed to remaining neutral in union organizing and operations to create strategies for success. The coalition will encourage the use of Project Labor Agreements and comply with Davis-Bacon and Related Acts. In particular, ISEFAA has a long relationship arc with labor unions, developers, and contractors. ISEFAA has a team of experts in the area of Black Labor Just Transition, along with the 8-point NAACP solar equity principles, and NAACP-led labor committees. The coalition's plans, policies, procedures, and goals will be derived from those sources along with the U.S. Department of Labor and Commerce Good Job Principles and the guidance in the Solar for All notice of funding opportunity and will ensure shared economic opportunity in the communities served.

The coalition will develop additional supports for workers trained through the initiative during Y1, including pipelines leading to job placements supporting funded projects, and will work with unions, contractors, and other employers to ensure workers with barriers to employment are fully supported in securing well-paid employment and realizing their goals.

The coalition will also develop a suite of small business services to support the growth of Indiana's solar industry. These services will invest directly in the creation of high-quality jobs to provide the most extensive support possible, leverage clean energy tax credits and require project developers to commit to the relevant prevailing wage and apprenticeship requirements, which increase the commercial investment tax credit from 6% to 30% for projects greater than 1MW. The coalition will also encourage the adoption of requirements to procure local talent, XBE and union contractors, contractors located in HUBZones, and contractors that specifically serve the Indiana market in municipal contracts.

Financial assistance strategy

Through a mix of residential rooftop solar, residential-serving community solar, associated storage, and infrastructure upgrades, the coalition will maximize the number of households benefiting from the Solar Opportunities Indiana program relative to the funding awarded.

As detailed in Program Planning Timeline and Work Plan Narrative (Section 7 of original proposal), Y1 planning will include technical assistance to Phase II cities to maximize the number of households benefiting from the Solar Opportunities Indiana program in these communities relative to the funding awarded while finalizing the type and size of subsidy to be provided and the households to be impacted in each geography. Additionally, the coalition has and will continue to ensure that all targets set are appropriate given the characteristics and needs of the communities served, including their local building stocks, electricity costs, homeowner ratios, and energy burdens.

The financial assistance provided in both first and second phase cities is designed specifically to support low-income and disadvantaged communities to deploy and benefit from residential rooftop and residential-serving community solar and storage. Accordingly, the coalition will direct 75% of its funding award towards financial assistance; the dollar amounts supporting residential rooftop solar, residential-serving community solar, and storage will be finalized during Y1 planning as well as where the storage will be sited; all storage assets will be deployed in conjunction with and connected to an eligible residential-serving solar project receiving Solar for All financial assistance. All community solar funded under this program will conform to the definition of residential serving community solar and will have a

nameplate capacity of 5 MW or less, deliver at least 50% of the electricity generated from the system to multiple residential customers within the same utility territory as the facility, and deliver at least 50% of the benefits and/or credits of the power generated from a community solar system to residential customers in the same service territory.

Leverage existing and varied sources of capital and financial assistance

Financial assistance strategies will be led by Solar United Neighbors (SUN) and IEIF and supported by CDFI Friendly Bloomington (a financial services nonprofit) and the Massachusetts-based People's Solar Energy Fund. These strategies are designed to ensure program longevity and market transformation beyond the program period and include:

- **Bulk procurement:** A powerful way to reduce costs is to leverage economies of scale. SUN has perfected this strategy in its rooftop solar co-op model, and the coalition will build upon this expertise in utilizing bulk procurement to realize savings.
- **Collaboration with SolSmart.** The coalition will encourage communities across the state to obtain SolSmart certification (as the City of Gary has done) and explore options for adopting tools for streamlining solar permitting like SolarApp+ from NREL; these strategies will make the rooftop solar installation process more efficient and will help to reduce upfront costs.
- **Maximization of Solar for All funds:** The coalition intends to provide zero-upfront cost solar to as many low-income households as possible. To achieve this outcome, the coalition will prioritize those with the highest energy burdens for zero-cost solar installations, prioritize those with healthcare equipment that requires consistent access to electricity for battery installation, and ensure all households receiving solar installations through SOI receive no less than 20% savings on average. A small number of moderate-income households residing in CEJST and/or EJScreen geographies will be eligible for rooftop solar installations; financing provided to these households may have an upfront cost if that is preferred by the household (e.g. to reduce the cost of monthly payments to be made).
- **Maximization of financing available via state programs:** The coalition has completed a comprehensive asset and resource mapping exercise for the state and will leverage these assets to the greatest extent possible to save solar energy customers money on their taxes and provide users with additional savings as they pursue energy efficiency improvements in the process to convert to using solar energy. The coalition has designed this approach with great care to ensure that any tax increases are mitigated for those receiving financial assistance, taking into account impacts to reported income and program eligibility. In some states, participant support costs can be considered income; the coalition will engage with the Indiana tax authority to ensure that there will be no income associated with Solar Opportunities Indiana financial assistance and will educate customers on how to file the proper form to ensure property taxes do not increase as a result of installing rooftop solar panels. Accordingly, existing programs, resources, and services that will be leveraged to reduce upfront costs include:
    - Home weatherization, clean energy/energy efficiency, and home repair and rehabilitation programs targeted towards low-income households and disadvantaged communities, such as WAP and others. The coalition will bundle these programs with energy audits and solar installation to make the most of the funding available for household financial and environmental sustainability.
    - The Indianapolis Power & Light (AES) Residential Energy Incentives Program
- **Maximization of financing available via federal programs:** The coalition will leverage IRA tax incentives and rebates, including:

    - The Residential Clean Energy Credit; The Clean Electricity Investment Tax Credit; The Home Electrification Rebate Program; The Home Efficiency Rebate Program; The Energy Efficient Home Improvement Credit
    - Financing is available through NCIF and CCIA awardees, including the Coalition for Green Capital, Climate United, Inclusiv, the Opportunity Finance Network, and Power Forward Communities. IEIF is already in communication with most of these awardees and will coordinate the financing to be provided.
    - Funding made available through the Biden Administration's Interagency Working Group (IWG) on Coal and Power Plant Communities and Economic Revitalization for the IWG-Identified 17-county priority area of Southern Indiana.
- **Maximization of financing available via other programs**
    - The coalition will collaborate with local governments to align its efforts with existing or newly developed, locally funded solar incentives (e.g., Bloomington Green Home Improvement Program).
    - As mentioned above, the coalition will collaborate with community development corporations (CDCs) to reach residents in scattered site single family and multifamily affordable housing units owned by the CDCs using direct pay to help finance new projects.
- **Collaboration with Indiana's new green bank, Indiana Energy Independence Fund:** IEIF will utilize its expertise in creating financial instruments that allow for investments to drive private capital, proactively engaging with stakeholders across the state, and interacting with state institutions to catalyze further investment to bear for the benefit of SOI. On behalf of the coalition, IEIF will lead the charge to:
    - Catalyze loans from private sector lenders to low-income multi-family developers and community solar projects (as available), using loan loss reserves and interest rate buydowns, which will yield lower interest rates, longer terms, and greater reach into undercapitalized communities to make solar energy more affordable.
    - Provide a revolving loan product to support solar installations in low-income and disadvantaged communities in perpetuity. The coalition additionally understands that any program income derived from interest payments on financial products received will be automatically considered a revolving loan fund for the Solar Opportunities Indiana program.
    - Provide a loan loss reserve to back the risk a traditional financial institution takes on in lending to a "higher risk" customer (e.g., a customer with a lower credit score, adverse findings on their credit report, active liens, etc.)
    - Provide gap financing for weatherization, energy efficiency, roof replacements, electrical wiring modernization, electrical appliances, and other applicable home improvements.
    - Leverage standard loan contracts by allowing for the bundling and sale of loans to recycle capital more quickly and profitably & enable more projects in communities while unlocking lower interest rates.
    - Collaborate with community development financial institutions (CDFIs), utilities, and others to offer financing similar to a power purchase agreement or solar loan that allows for system ownership.
- **Collaboration with CDFIs.** The proposed program will benefit from the support of CDFI Friendly Bloomington. As part of its mission to provide technical assistance and coordination for community projects in a 13-county region, CDFI Friendly Bloomington can introduce the coalition to other CDFIs and even provide gap financing to solar customers and communities alongside CDFIs to facilitate projects or mitigate risk.

- **Collaboration with other Solar for All awardees.** The coalition is in active communication with other Solar for All coalitions, and the City of Indianapolis and the City of Fort Wayne are participating as implementation partners on coalitions apart from SOI as well. The scope for Indianapolis' Solar for All awarded projects is entirely different from the scope proposed as part of their participation in the Solar Opportunities Indiana program, maximizing the number of households served through each respective program. For its part, Fort Wayne is pursuing rooftop and community solar projects with both of its Solar for All awards; the City has ensured that both initiatives are scaled appropriately given the awards made to ensure they are maximizing the households served through each Solar for All awarded program. While no official partnerships have been formed as of yet with other Solar for All awardees, and no funds from these awards are being leveraged, the coalition will continue to communicate with other awardees to share information and resources as the period of performance begins and continues. For any partnerships formed with other Solar for All coalitions and/or awardees, SOI commits to ensuring that there will be no double counting of outputs or outcomes where other programs will be leveraged; in short, SOI will only report the outputs and outcomes related to this Solar for All award.

The financial assistance strategies described above were carefully designed to complement, and not duplicate, existing subsidies, tax credits, and other sources of financing. Further details regarding the nature of these financial products (purpose, type, transaction parties and beneficiaries, size, projects financed, etc.) will be provided at the conclusion of the Y1 planning period. By providing a complete package of financial support and helping households to navigate the resources available for solar energy adoption, the Solar Opportunities Indiana program will harness the programs and resources available to drive solar energy adoption among Indiana households. Accordingly, these strategies will support solar deployment in a manner that would not have occurred otherwise and will build significant capacity across the state that will further empower low income and disadvantaged communities.

Criteria for associated storage and upgrades

In distributing program funds, SOI will provide battery access where it is needed the most and will prioritize households with members with healthcare equipment that requires consistent access to electricity for battery installation. In addition, batteries will be provided to power resilience hubs, which will support community-serving facilities in providing access to critical needs and services during public emergencies. Deployment targets for residential storage are listed on the table on page 3.

The Solar Opportunities Indiana program will provide financial assistance for enabling upgrades, including roof replacement and repairs, electric wiring upgrades for housing, weatherization and energy efficiency improvements, grid connectivity, and a microgrid management system to address barriers to the deployment of residential and residential-serving community solar. These upgrades will come largely as a result of energy audits, to be completed for each solar customer, and the upgrades will be funded with a combination of subsidy, public, and private funds to ensure the maximization of existing no-or-low-cost financing and to ensure that no more than 20% of total financial assistance distributed for the lifetime of the program is used for enabling upgrades. Costs for enabling upgrades are included in the table on page 3. The prioritization of these highest-need households, and the bundling of services and upgrades with each solar installation, will ensure that SOI maximizes the resources available to support solar customers while still providing solar energy to as many low-income and disadvantaged households as possible.

The coalition understands that enabling upgrades should be used sparingly and only when necessary and that enabling upgrades will only be funded in conjunction with a solar investment. In compliance with EPA rules for the Solar for All program, the coalition will ensure the share of financial assistance expended on enabling upgrades does not exceed 20% of the financial assistance provided over the lifetime of the program and that program funds are not used to electrify equipment. The coalition has and will continue to explore other sources of funding for enabling upgrades, in particular energy efficiency upgrades, as the program continues.

Regarding grid upgrades, the need for any grid upgrades will be fully assessed during Y1 planning, at which point, the coalition will provide a robust plan to EPA for how it will acquire customers in LIDACs to subscribe to the solar deployed. In addition, the coalition will further define any participant support costs to be paid to utilities via a subaward as coalition partners work through the interconnection process with partnering utilities. Any subawards made will only be provided to eligible subrecipients in accordance with EPA's Subaward Policy, and the coalition will ensure that all subrecipients comply with the requirement that a recipient must only receive reimbursement for their actual direct or approved indirect costs such that they do not "profit" from the transaction.

Long-term program sustainability

To ensure the sustainability of the Solar Opportunities Indiana program, the coalition will:

- **Update local housing regulations.** Many communities in Indiana lack protections for residents experiencing high housing cost burdens, rapidly rising housing costs, and/or displacement; these issues threaten residents' access to housing as well as to energy. The coalition will collaborate with local governments to update these policies, providing technical assistance to support their ability to institute new policies that maintain affordability of existing housing stock, protect residents from displacement, and prevent rapid cost increases for low-income and disadvantaged households and communities and/or other unintended consequences of solar development. Some policy examples to be explored include rent controls, grandfathered property tax rates, and renter protections, such as providing legal representation for eviction cases or preventing rent increases in properties that are not up to code. The exploration of policy will supplement local strategies that prioritize the construction and maintenance of affordable housing and/or provide frameworks supporting the startup and operation of community land trusts. Coalition members will meet to discuss these issues and refine a strategy to provide protections to residents during the Y1 planning period.
- **Support the operations, maintenance and recycling of assets**. The coalition plans to support the operations, maintenance, and recycling of all assets funded under the program by executing a lifetime operations and management agreement as part of the procurement process through the installation company or a third-party vendor. These agreements will include terms to ensure the maximum energy output of the assets and will require parties to the agreement to conduct audits and perform needed maintenance on a regular basis; all agreements will conform to EPA's General Terms and Conditions and ASAP and Proper Payment Draw Down terms and conditions. In 2023, the Indiana legislature passed a bill to study how best to recycle old solar panels and several companies exist to service nascent recycling efforts for solar PV, such as We Recycle Solar. Solar installers are a conduit to these services, and the coalition will work with both these installers and the state to develop recycling support for solar customers.

With these strategies, the coalition will provide the greatest possible return on investment for federal Solar for All funding while maximizing the extent to which low-income and disadvantaged communities can participate in the program. In addition, the coalition will ensure the Solar Opportunities Indiana program's longevity and market transformation beyond the program period.

Project-Deployment Technical Assistance Strategy

Numerous non-financial barriers, including skilled labor shortages, interconnection challenges, procurement issues, lack of awareness or confusion among housing developers and program partners, outdated local building codes and housing regulations (as revealed through SolSmart), inefficient installation processes, and poor community accountability impede the realization of the full potential of Indiana's solar market. The coalition has structured its program to address these barriers and will work with a variety of cross-sector partners across the state to improve the overall environment in which the solar market operates. 25% of the coalition's total award will be directed towards administrative overhead and technical assistance, with the technical assistance component to be finalized during the planning period.

Investment in solar deployment workforce

To design a comprehensive solar workforce development initiative for Indiana in Y1, the coalition's Workforce Development subcommittee will collaborate with local and statewide organizations. This engagement will give the coalition the opportunity to gauge which current efforts in Indiana's solar workforce development are the most promising for their ability to help the coalition fulfill its goals for equitable, effective solar workforce development and where any gaps in the workforce development ecosystem exist. Accordingly, the planning period will allow the subcommittee to determine next steps, including which efforts will be supported and expanded with awarded funds. Together, the workforce development subcommittee and those engaged will:

- Expand participation in state-certified solar job training programs focused on low-income and disadvantaged communities.
- Train workers in low-income and disadvantaged communities for middle-class career pathways and place them into high-quality roles in Indiana's emerging solar industry in partnership with workforce partners.
- Recruit and retain trainees and students by providing wraparound support such as affordable childcare and transportation, barrier-busting assistance, mentoring, and other support that may be offered through existing programs and/or community-based organizations. The coalition currently has $6M budgeted for workforce development efforts, with participant support costs to be determined during the planning period.
- Create a network of unions, solar developers, contractors, and others with strong labor practices to strengthen and build new opportunities for placement in high-quality jobs exemplifying the Department of Commerce and Department of Labor Good Jobs Principles.
- Build a pipeline of highly knowledgeable workers skilled in the installation, maintenance, and repair of solar energy systems to power Indiana's solar industry.
- Collaborate with local governments to align existing or newly developed locally-funded workforce development incentives with coalition efforts.
- Collaborate with state policymakers to align coalition efforts with Indiana's Next Level Jobs program, which provides grants to workers and employers to cover the cost of training within recognized industries.

Technical assistance: Interconnection

When working with Indiana's five IOUs, solar project managers find that it often takes more than the 45 days allowed by law to accomplish interconnection. Other barriers include: unreasonably high application fees; adherence to a "first-ready, first-served" (versus a first-come, first-served) approach; and lack of information, transparency, and simplicity regarding the interconnection process.

Solar Opportunities Indiana will address these barriers by building the utility coordination structure the state needs to ensure solar projects serving low-income and disadvantaged residents are completed in a timely, customer-friendly manner, and achieve successful outcomes. The coalition will design the processes, procedures, and management of this structure during Y1, creating strategies and sharing best practices with utilities to address common pain points solar developers and communities have experienced under current interconnection processes.

The new utility coordination structure will:

- Replicate the City of Indianapolis' model for engaging utilities proactively in integrative resource planning at the local utility level in Gary, Columbus, Fort Wayne, and other municipalities.
- Align the efforts of groups working on utility coordination across the state to develop a more seamless, replicable, unified process.
- Intentionally engage the state, local agencies, non-governmental organizations, community-based organizations, utility companies, and others in collaborative projects and initiatives.
- Streamline and strengthen the standard interconnection process used by Indiana electric utilities: the *Freeing the Grid* report makes several specific recommendations that would improve the state of Indiana's interconnection process. These include increasing system size limits for Level 1 and Level 2 review processes, establishing a defined supplemental review process with specified screens to reduce uncertainty for those applications, and incorporating energy storage as an eligible technology within the definition of "customer-generator facility," among others.

Encourage utility partners to activate the tools and expert resources available from the Department of Energy's i2x Technical Assistance program to improve their data collection, interconnection queues, and understanding of their challenges while innovating solutions to common interconnection challenges for distributed solar.

Technical assistance: Other

Many municipalities in Indiana have building codes that have not kept pace with technology advances and do not include requirements for all-electric appliances in new construction and major retrofits. Additionally, some rules actively inhibit the implementation of energy efficiency improvements. Apart from these codes, navigating the complex permitting and regulatory processes for solar installations can be daunting, time-consuming and expensive for homeowners and installers alike. A balkanized local solar landscape makes it difficult for companies to scale and complete projects where each local government or utility might impose unexpected roadblocks. Homeowners Associations (HOAs) are also a significant barrier to many solar installations around the state, despite a 2022 state law (HEA 1196) creating a new pathway for homeowners in a restrictive HOA to go solar. The net effect is higher soft costs for installers and greater upfront costs in time and money for consumers. To address these issues, the coalition will:

- **Provide technical assistance for the existing Indiana solar workforce about SOI procurement requirements:** Before issuing RFPs that align with EPA procurement standards, the coalition will host at least one information session for interested solar companies to educate them about the federal procurement requirements (including compliance with Davis Bacon and Related Acts, Buy American, Build America, etc.), explaining the expected procurement opportunities over the course of the SOI program and how companies can submit proposals for the work. A recorded copy of this meeting will also be available online for future reference by interested companies and other stakeholders.
- **Provide technical assistance for interested affordable housing developers:** The coalition will host at least one information session for interested affordable housing developers who will be building new homes during the SOI program timeline or may be interested in adding solar to their properties in the future. The session will explain the SOI program, outline best practices for making a property solar ready, and describe immediate opportunities for program participation to benefit their clients. A recorded copy of this meeting will also be available online for future reference.
- **Provide technical assistance for program partners:** The coalition will host at least one information session and provide a translated digital toolkit about the Solar Opportunities Indiana program for program partners who are interested in helping their clients or constituents benefit from the program. This could include local community action agencies, community development corporations, service providing nonprofits and community groups, and similar organizations. A recorded copy of this meeting will also be available online for future reference.
- **Update local building codes and housing regulations**: The coalition will provide technical assistance to local governments that wish to update building codes that inhibit solar adoption by sharing information, upon request, about example building codes that support greater building electrification, solar installation and energy efficiency improvements. The coalition will also provide technical assistance that helps interested local governments to advance related policies, such as local third-party ownership policies, and replicate successful policies such as Gary's side lot policy, which allows adjacent property owners to acquire a no-cost vacant lot and install solar on it, increasing local wealth and sustainability. Finally, the coalition will provide technical assistance to support all partners in meeting the most current, broadly accepted consensus-based building codes and standards.
- **Streamline the installation process:**
    - Streamline solar permitting in communities around the state: Encourage communities around the state to obtain SolSmart certification and explore options for adopting tools for streamlining solar permitting like SolarApp+ from NREL. Creating a more unified and standardized process for local permitting will make the rooftop solar installation process more efficient around the state.
    - Leverage the coalition partners' expertise in installation coordination: With extensive experience coordinating solar installations across the state, coalition partners will build upon their shared expertise to reduce the administrative burden, and its associated costs, on community members. Specifically, these partners will provide technical assistance around: engaging with utilities on project siting; ensuring projects are compliant with land use, zoning, and environmental requirements and are resilient to climate hazards; managing permitting processes and challenges; and incorporating best practices in post-construction project inspection and quality control processes. As part of Y1 planning activities, the coalition will develop comprehensive procurement processes, incorporating appropriate requirements for contractors to ensure industry standards are met and quality installations are realized. In addition, for projects that

may disturb the surrounding environment, the coalition will ensure that sustainable siting best practices are followed, including considering possible climate hazards, avoiding greenfield development whenever possible, and pursuing agrivoltaics and pollinator friendly practices; the coalition will utilize the Institute for Sustainable Infrastructure's Envision framework as appropriate to this end, though the majority of SOI solar projects will deploy solar systems on existing structures such as single and multifamily homes, commercial properties, parking lots and brownfields. In providing this technical assistance, the coalition will partner with utilities to ensure efficient siting, interconnection, and resilient assets, as described through the actions above.

- **Encourage Community Benefit Agreements (CBAs):**
  - Collaborate with municipalities: Many Indiana municipalities have considerable experience coordinating CBAs; others have existing local participation ordinances or similar ordinances that can be built upon to coordinate the adoption of CBAs or otherwise articulate public benefits and related agreements.
  - Collaborate with EPA Region 5: EPA Region 5 is currently organizing municipal sustainability departments in each community in the region to develop strategies for working with community members on projects that aim to reduce pollution, foster the adoption of clean energy, and achieve related environmental goals. Through this work, communities can share information about how to encourage CBAs and align them with existing Climate Action, Climate Resilience, and Comprehensive Plans.
  - Coordinate with SOI subcommittees and others: The coalition's Community Solar subcommittee will be charged with developing a Community Benefits Plan for the overall program during Y1 planning. The subcommittee will also draft template CBA's to provide to communities and inform their conversations with solar developers, contractors, and others as each coalition partner works to develop CBAs for their projects. Community members will receive education about CBAs, which will be coordinated by the resident-led Advisory Committee.

In Y1, the coalition will work with utilities, and the State of Indiana, as appropriate, to form partnerships as needed with utilities and create efficiencies for program deployment.

Equitable Access and Meaningful Involvement Plan

The coalition has made a steadfast commitment to ensure the proposed program will serve and benefit Indiana's low-income and disadvantaged households and communities. With guidance from ISEFAA, Solar Opportunities Indiana will ensure environmental justice and racial, economic, and social equity in program design, outreach, engagement, outcomes, and governance, in alignment with President Biden's Justice40 Initiative and EO 14091.

Maximize the breadth and diversity of the communities served

Equitable access and meaningful involvement will be informed by (a) the deep ties coalition partners have built over decades in low-income and disadvantaged communities and (b) the myriad of successful engagement strategies they have utilized to reach and connect with urban, suburban, and rural communities, and historically underserved groups in culturally responsive ways. Acknowledging and responding to Indiana's history with fossil fuels, the coalition will be able to approach traditional energy communities with respect, sensitivity, and a spirit of inclusion. Led by ISEFAA, and supported by

Asociación Latinoamericana del Sur de Indiana (ALASI), NETWORK Indiana Advocates Team, and nearly a dozen Indiana branches of the NAACP, Solar Opportunities Indiana will address various non-financial barriers to solar energy adoption and/or participation and maximize solar deployment.

Indiana residents come from all walks of life, and the coalition has intentionally devised strategies to ensure that all residents—in urban, rural, and suburban areas; residents who do not speak English as a first language; residents in low-income and disadvantaged communities, and residents living in a variety of homes, from single family to multifamily and manufactured homes—do not face unjust barriers impacting their ability to participate in, benefit from, and exercise leadership within the Solar Opportunities Indiana program. To remove barriers to participation and ensure culturally appropriate and responsive outreach and engagement, the coalition will:

- **Inform residents about meetings and participation opportunities through trusted and diverse communication channels (e.g., local media sources such as community newspapers, cultural events, houses of worship, Spanish-language radio and publications, and community flyers).** In addition, the coalition will distribute press releases to local news stations and make social media posts targeted towards LIDACs; All media will be designed in a culturally competent and inclusive manner. Earth Charter Indiana (ECI) will serve as the designated media point of contact.
- **Host accessible community meetings.** To make meetings as accessible as possible for Indiana's diverse residents, the coalition will:
    - Ensure meeting sites are geographically distributed across the state, easily navigable and near major roadways, and ADA-compliant.
    - Host meetings at various days/times.
    - Post streaming meeting content on the Solar Opportunities Indiana website to maximize participation and transparency.
    - Provide free translation and interpretation services in commonly spoken languages, including Spanish and American Sign Language.
- **Structure program delivery to eliminate unjust barriers to access.** The coalition will reduce unnecessary or intimidating paperwork, including specific instructions on how to proceed through each step of the program, and provide culturally appropriate educational resources in print and spoken (or signed) in person to aid residents with varied backgrounds and literacy and learning styles. In addition, the coalition will use jargon-free language understandable to the general population and frame the benefits of solar energy above and beyond reductions in greenhouse gas emissions, such as energy bill savings, resilience during disasters and outages, and cleaner air and improved health outcomes. The coalition will also provide web and digital materials in an accessible way for those with visual or hearing impairments and provide Spanish language translation for digital and web materials.
- **Connect residents with "someone like them."** Social networks can be a powerful lever in encouraging solar energy adoption. The coalition will work with local organizations and governments in planning and promoting community meetings. As noted in the Budget Narrative, the expansion of Faith in Place Green Teams is rooted in recruiting and hiring residents from the communities that they will serve.
- **Support the participation of people and communities in the Solar Opportunities Indiana program.** As noted in the Budget Narrative, Participant Support Costs (PSC) have been budgeted to compensate residents who participate and contribute to the program's design, operations, governance and evaluation activities. Each of the twelve resident advisory board members will receive $1,000 per year for five years plus travel costs to facilitate their involvement.

In implementing the above activities, the coalition affirms that it will not discriminate on the basis of race, color, national origin, sex, age or disability and thus will not distribute EPA financial assistance based solely or partially upon any of these factors, in compliance with federal laws.

Participatory governance

The Solar Opportunities Indiana governance model (below) demonstrates the coalition's commitment to an equitable and democratic form of decision making and governance.

To ensure Indiana residents of diverse backgrounds play an active role in the design, delivery, and governance of the Solar Opportunities Indiana program, the coalition includes:

- **An Advisory Committee:** Indiana residents of diverse backgrounds and circumstances will serve on a resident-led Advisory Committee. Through this committee, these residents will inform, engage, question, and advise the coalition on topics relevant to the successful operations of the program. Advisory Committee members will be recruited in partnership with trusted community organizations like IN-CAA, ISEFAA, Faith in Place, SUN, ECI, and others. As noted in the Budget Narrative, Advisory Committee members will receive stipends for their participation and reimbursement of any incurred travel costs. Residents will be recruited to serve on the Advisory Committee during Y1 for the program and will serve for a term of one year at a time.
- **An ongoing, participatory design, delivery and evaluation strategy:** During Y1, IN-CAA will contract with an external evaluator to develop a comprehensive evaluation plan which authentically engages low-income and disadvantaged community residents. The five-year evaluation will:
    - Actively engage a broad and diverse population of residents and community-based organizations across Indiana that represent the populations being served to capture necessary and ongoing feedback for the coalition.
    - With the leadership of IN-CAA's Solar for All Program Director (see page 6), create a regular meeting cadence that allows for continuous engagement of residents, community-based organizations, and communities in program implementation in Y1. Meetings will be held in accordance with accessibility strategies described on pages 20-21. As the Solar Opportunities Indiana program scales to serve additional communities across the state over time, the information shared during these initial (and ongoing) engagement sessions will prove invaluable to the coalition in documenting lessons learned that can inform future efforts. Through these meetings, community members will have the opportunity to participate in the continuing design of the SOI program, and later, its delivery and evaluation.
    - To maximize transparency and participation, meeting notes, best practices, and reports will be shared on the Solar Opportunities Indiana website.
    - The evaluation plan, to be completed in Y1, will support feedback on the effectiveness of program implementation across Indiana and measure progress towards objectives on key performance metrics. Data collection will consist of quantitative measures capturing target outputs and outcomes as well as qualitative data collection to capture community experiences with the SOI program and inform the program's goal to meaningfully serve low-income and disadvantaged community residents. The resident-led Advisory Committee will play an active role in this process.

- The contracted evaluator will use culturally relevant methods aligned to the demographics and needs of the communities served by Solar Opportunities Indiana (such as local data collectors and incentivized, flexible, accessible, and varied data collection methods).
- The coalition is developing equity principles to inform the design and delivery of Solar Opportunities Indiana; each coalition subcommittee will be responsible for exemplifying these principles and evaluating its success each year for accountability.

Education, outreach, and community engagement

Without intentional, culturally relevant community engagement through trusted sources, the goals of Solar for All will be difficult to realize. To address these barriers, the coalition will:

- **Provide extensive public outreach and education:** Targeted, strategic outreach and engagement is a critical component of any successful Solar for All program. As such, the coalition has assembled an experienced team of outreach and engagement leaders across the state to ensure that every low-income and disadvantaged Indiana resident in Gary, Columbus, Fort Wayne, Indianapolis, and beyond has an opportunity to participate in Solar Opportunities Indiana. With specific strategies designed to serve Indiana's diverse population, the coalition partners will:
  - Leverage existing outreach and engagement opportunities, such as those that are led by the city governments in each SOI geography, those that occur through existing weatherization programs offered by local CDCs and others, and those that are offered through grassroots organizations and others to explain this new form of solar access and the financing models that support it.
  - Harness the deep network and proven expertise of the Indiana Solar Equity for All Alliance and network of NAACP branches in reaching out to residents of color.
  - Build on the network of houses of worship organized by Faith in Place to meet residents where they are while engaging them in the program, including through solar installations and design and program delivery workshops. Recently, Faith in Place partnered with the Illinois Solar for All initiative and educated 3,000 residents of Environmental Justice communities about that initiative through workshops, events tabling, and one-on-one conversations with those interested in adopting solar energy. Faith in Place will replicate this success in Indiana.
  - Utilize the experience and expertise of SUN in engaging and enrolling low-income and disadvantaged Indiana residents into solar energy cooperatives and guiding residents through the solar energy installation, activation, and maintenance processes.
  - Build upon ECI's 22 years of experience in outreach and organizing for climate action across the state and utilize its network of Resiliency Coordinators throughout the state.
  - Ensure language is not a barrier, using the strategies described in Section 6a of original proposal: Maximize the breadth and diversity of the communities served.
  - Build additional partnerships for outreach, education, and engagement over the five years of the federal funding period. The coalition plans to cultivate relationships across the state with housing and community development agencies, LIDAC-facing nonprofits, K-12 educational institutions, and justice-based organizations who often serve at the periphery of tackling energy burden to incorporate a more holistic and visionary approach to solar as a resource for providing energy assistance. The coalition plans to seek alignment with organizations who are working to address food access and other

basic needs to expand the resources available to the LIDACs they serve. Additionally, the coalition will seek to create a durable Solar Opportunities Indiana movement by seeking additional funding for future projects outside of Solar for All and providing technical assistance and educational support beyond the five-year term of Solar for All.

Customer acquisition and program management

With IN-CAA's leadership in place, the coalition will expand partnerships with community-based organizations across the state. The coalition has engaged an array of trusted community-based organizations serving diverse communities in Gary, Columbus, Fort Wayne, Indianapolis, and beyond. Many of these partners provide existing need-based federal, state, or utility assistance programs such as WAP, SNAP, TANF, Lifeline, and LIHEAP and are skilled in performing robust income verification above and beyond attestation, including through categorical eligibility, while minimizing burdens on households. Households participating in these programs will be referred, as the need and interest arises, to participate as customers in the Solar Opportunities Indiana program.

The coalition plans to expand these partnerships to serve the state's urban, suburban, and rural residents more broadly as the Solar Opportunities Indiana program scales over time, reaching these residents and including communities with limited English proficiency and residents living in a variety of types of residential buildings, including single-family, multi-family, and manufactured homes. Each of these partners will play a critical role, engaging the low-income and disadvantaged residents they serve; advising on outreach, education, and engagement strategies; creating pathways for inclusion in program design and governance; and ensuring that the programs to be provided will successfully meet the needs of the communities in which they operate. Collectively, the partners will help the coalition to acquire thousands of low-income and disadvantaged customers and to maximize solar deployment across the state. IN-CAA will leverage their experience with low-income resources and utility customer safety nets along with their current connections throughout the entire state to acquire customers, direct customers to coalition partners, and monitor the coalition's administration of the income verification process for customers in the Solar Opportunities Indiana program.

The coalition, monitored by IN-CAA, will perform robust income verification for Geographically Dispersed Low-Income Households. To minimize burdens on households, the coalition will consider two options for income verification:

1) Income verification through existing means-tested programs, such as federal assistance programs (LIHEAP, WAP, food stamps, TANF, etc.) or state-regulated income-qualified programs. Both sets of programs are subject to strict regulatory scrutiny and therefore offer a high level of confidence in their accuracy. In addition, these programs conform with the low-income definition in the EPA Terms and Conditions: Low-income individuals and households living in Metropolitan Areas with incomes not more than 80% AMI or 200% FPL (whichever is higher), and low-income individuals and households living in Non-Metropolitan Areas with incomes not more than 80% AMI, 200% FPL, or 80% Statewide Non-Metropolitan Area AMI (whichever is highest). Federal Poverty Level (FPL) is defined using the latest publicly available figures from the U.S. Department of Health and Human Services. Area Median Income (AMI) is defined using the latest publicly available figures from the U.S. Department of Housing and Urban Development. Metropolitan Area and Non-Metropolitan Area are defined using the latest publicly available figures for county-level designations from the Office of Management and Budget. Statewide Non-Metropolitan Area AMI is defined using the latest publicly available

figures from the U.S. Department of the Treasury's CDFI Fund, with an adjustment for household size using the U.S. Department of Housing Development's Family Size Adjustment factor.)

If this option is unavailable, the coalition will conduct a standard income verification process using data points such as a Social Security award letter, pay stub, tax return, or bank statement. These documents will be securely stored through the verification process until program eligibility is validated. Households located in CEJST-Identified Disadvantaged Communities or EJScreen-Identified Disadvantaged Communities will not require further verification beyond confirmation the household is located in such a community; rather, applicants will be asked to self-attest their household income. Tenants residing in Properties Providing Affordable Housing will not require further verification beyond confirmation they reside in such property; these households will also be asked to self-attest their income. A comprehensive customer retention plan will be developed during Y1 planning, during which time the coalition will also develop a comprehensive strategy to ensure SOI prioritizes serving the most overburdened and low-income households in geographically-defined LIDACs. SOI does not intend to serve a more specific subset of the definition of low-income and disadvantaged communities provided in the Terms and Conditions but rather will serve any household that meets the above qualification criteria.

SECTION 3: FISCAL STEWARDSHIP PLAN

IN-CAA will serve in the role of nonprofit fiscal manager for the Solar for All Indiana coalition. To reduce waste, fraud, and abuse of funds, IN-CAA is building robust governance structures and policies designed specifically to oversee the sound provision of financial assistance for clean energy projects.

Program Oversight Plans and Policies

Key policies governing IN-CAA's operations are codified across IN-CAA's Bylaws and Fiscal Policies and Procedures and include the following:

- A Conflict of Interest Policy that IN-CAA directors and officers annually review and sign.
- Work Program and Budget processes requiring annual approval by the Board.
- A Procurement Policy that governs approvals for entering into contracts with vendors.
- Annual audited financial statements developed with an independent certified public accountant and overseen by the Finance Committee.
- The Board meets six times per year, with board committees meeting on off-months, and the CEO reports quarterly to the Board on budget vs. actuals.
- Employee Personnel Policies adopted by the Board that includes policies on diversity, equal opportunity employment, conflicts of interest, confidential reporting (including whistleblower protections), and non-disclosure of confidential information.

IN-CAA plans to administer subgrants, vendor contracts, and Participant Support Costs in compliance with the requirements in 2 CFR § 200.303 and 2 CFR § 200.332(b) and (d). For subawards, IN-CAA will conduct an assessment prior to making a subaward to determine the risk of noncompliance with federal and state laws and subaward terms. IN-CAA will require subrecipients to submit regular reports (in accordance with the Terms and Conditions of the Award) with performance and fiscal information and information demonstrating compliance with applicable federal and state requirements. IN-CAA plans to administer subgrant payments in compliance with EPA requirements, requiring submission of correct

and complete source documentation for expenditures to ensure funds are only utilized for authorized purposes. IN-CAA will annually review Single Audit Reports for appropriate subrecipients.

At this time, SOI is not planning on a revolving loan fund. However, if, during Year 1 Planning, SOI determines any of the subawardees will utilize a revolving loan fund, SOI will seek the assistance of IEIF to capitalize a revolving loan fund. In doing so, IEIF will work with IN-CAA to establish a financial management plan for program income, which includes, but is not limited to, repayments of the principal on loans, interest on loans, asset sales, and loan origination fees. In accordance with 2 CFR 1500.8, IEIF will retain and reuse program income for additional capital deployment under a close out agreement after the period of performance ends. IN-CAA will not have a revolving loan fund, and, therefore, will not have program income.

Consumer Protections Plan:

The coalition will ensure that all program participants are afforded the full measure of consumer protection possible in Indiana. All vendors, subrecipients, and potential project partners interacting with consumers through Solar for All-funded activities will be evaluated on their consumer protection policies and procedures prior to selection or the provision of financial assistance. IN-CAA will also implement annual consumer protection training for all employees, vendors, subrecipients, and project partners who interact directly with consumers as part of Solar for All-funded program activities. Consumer-facing SOI content published by IN-CAA jurisdictions the program will serve. IN-CAA will additionally ensure that subrecipients have appropriate procedures in place for ensuring consumer-facing SOI content published by the subrecipients is reviewed for consumer protection compliance with all federal laws and all laws in the jurisdictions the program will serve.

IN-CAA recognizes that rooftop solar contractors will have the most interaction with consumers. IN-CAA collaborates with coalition partners to evaluate contractor consumer protection practices prior to the selection of contractors into the contractor network. This includes ensuring contractors are licensed and in good standing in the state of Indiana, have policies and practices that comply with federal and state consumer protection laws, insurance requirements, and industry best practices, and are in good standing with the Better Business Bureau and other platforms. After a contractor is accepted into the SOI vetted contractor network, there will be an established process for the coalition to review each solar project and contract prior to project installation, after project installation, and before disbursing funds. IN-CAA will also provide all IN-CAA consumers with the opportunity to provide feedback via a standardized survey process that includes questions about compliance with consumer protection laws and standards.

Consumer complaints can be made (confidentially or otherwise) directly to IN-CAA and/or coalition partners via email or phone. If a consumer protection violation is discovered, either from a consumer complaint or through IN-CAA's regular monitoring practices, remediation steps may include, (1) delivering a warning to a contractor in violation of consumer protection procedures and working with the contractor to remediate the violation and put in place processes for avoiding violations in the future; (2) placing a contractor on probation, which triggers additional IN-CAA reviews, including more frequent audits and spot checks; (3) If the contractor cannot remediate the issue and/or the contractor made multiple violations, then the contractor may be expelled from the IN-CAA program and held responsible for "making consumers whole" in instances of negligence resulting in a financial loss to the consumer related to the program.

SECTION 4: TIMELINE AND MILESTONES

The unique strength of the coalition lies in its collective experience and expertise with low-income and disadvantaged communities – across the state; in rural, suburban, and urban areas; and in environmental justice and poverty alleviation. Acknowledging that strength, the coalition recognizes the need for an in-depth and focused Y1 planning phase. This Y1 work will ensure that the coalition's impact assessments for distributed solar deployment and associated financial strategies and technical assistance; workforce development and wraparound services; and customer acquisition through community engagement, outreach, and education have been thoroughly considered and the target goals for all are both robust and realistic. With funds budgeted (travel, hospitality, honoraria, translators, etc.) to support full participation across Indiana of all vested stakeholders, Y1 work will also ensure that the coalition has identified all vested stakeholders and fulfills the requirements of EO 14091 and Justice40.

The coalition's work priorities, timelines and milestones are illustrated in the chart below:

	Y1	Y2	Y3	Y4	Y5
Evaluation & Reporting	Hire Data Manager. Design and issue RFP for external evaluator; Contract with evaluator; Co-design evaluation plan; Review of extant data; Collect baseline data and refine targets; Semi-annual reports completed & submitted to EPA along with transaction-level and project-level data; Incorporate forthcoming EPA guidance on Build America, Buy America and Davis-Bacon Act	Data collection and analysis; Semi-annual reports completed & submitted to EPA along with transaction-level and project-level data; Initial publication of findings and impact	Data collection and analysis; Semi-annual reports completed & submitted to EPA along with transaction-level and project-level data; Ongoing publication of findings and impact	Data collection and analysis; Semi-annual reports completed & submitted to EPA along with transaction-level and project-level data; Ongoing publication of findings and impact	Final data collection and analysis; Final Report completed & submitted to EPA along with transaction-level and project-level data; Final publication of findings and impact

	prevailing wage requirements				
Meaningful Benefits	Survey of Indiana Household Energy Insecurity; Review inefficient utility processes; With EPA, refine estimates for household savings inclusive of any costs the program beneficiary incurs for participating in the program.; Education/ Training for all Coalition members in equitable solar policy principles; Activate networks of supporting organizations; Develop "stacked funding" models; Develop comprehensive statewide solar-focused workforce initiative and small business supports; Determine operations and maintenance plan strategy;	Education /Training for Phase II cities in equitable solar policy principles; Public outreach with supporting organizations	Education/ Training for rural communities in equitable solar policy principles; Public outreach with supporting organizations	Education/ Training for rural communities in equitable solar policy principles; Public outreach with supporting organizations	Survey of Indiana Household Energy Insecurity; Education/ Training for rural communities in equitable solar policy principles; Public outreach with supporting organizations

	Create resource guide for participants; Develop a Community Benefits Plan and draft template CBA's; Develop robust strategies to ensure that households that don't have individual meters will realize savings benefits; Develop strategies to provide protections against unintended impacts of solar development, particularly housing cost increases				
Distributed Solar Market Strategy	Develop utility coordination structure; Work with utilities and the IURC to create efficiencies for program deployment, address need for grid upgrades, and refine financial subsidies with input from industry; Refine strategy for public policy education;	Work with Phase II cities on solar deployment projects; Public policy education; Work with utilities and the IURC for project deployment; Provide public benchmarking.	Work with rural communities on solar deployment projects; Public policy education; Work with utilities and the IURC for project deployment; Provide public benchmarking.	Public policy education; Work with utilities and the IURC for project deployment; Provide public benchmarking.	Public policy education; Work with utilities and the IURC for project deployment; Provide public benchmarking.

	Provide public benchmarking.				
Financial Assistance	Ongoing review of financing available through federal, state, or other sources; Ongoing collaboration with CDFIs and Indiana's Green Bank; Policy reviews and research on state solar policies; Ongoing review of nationwide resources for Solar for All deployment	~85% of funds deployed; Ongoing review of financing available through federal, state, or other sources; Ongoing collaboration with CDFIs and Indiana's Green Bank; Policy reviews and research on Indiana's policies; Ongoing review of nationwide resources for Solar for All deployment	~98% of funds deployed Ongoing review of financing available through federal, state, or other sources; Ongoing collaboration with CDFIs and Indiana's Green Bank; Ongoing review of nationwide resources for Solar for All deployment	~99% of funds deployed Ongoing review of financing available through federal, state, or other sources; Ongoing collaboration with CDFIs and Indiana's Green Bank; Ongoing review of nationwide resources for Solar for All deployment	~100% of funds deployed Ongoing review of financing available through federal, state, or other sources; Ongoing collaboration with CDFIs and Indiana's Green Bank; Ongoing review of nationwide resources for Solar for All deployment
Project-Deployment Technical Assistance	Information sessions; Occupational needs assessment for statewide solar industry; Inter-connection technical assistance; Technical assistance for resilient project siting, land-use, permitting, building codes, inspection, and	Information sessions; Rollouts of investments in solar deployment workforce; Inter-connection technical assistance; Technical assistance for resilient project siting, land-use, permitting, building codes,	Information sessions; Ongoing investments in solar deployment workforce; Inter-connection technical assistance; Technical assistance for resilient project siting, land-use, permitting, building codes,	Information sessions; Ongoing investments in solar deployment workforce; Inter-connection technical assistance; Technical assistance for resilient project siting, land-use, permitting, building codes,	Information sessions; Ongoing investments in solar deployment workforce; Inter-connection technical assistance; Technical assistance for resilient project siting, land-use, permitting, building codes,

	quality control; general project refinement	inspection, and quality control	inspection, and quality control	inspection, and quality control	inspection, and quality control
Equitable Access and Meaningful Involvement	Convenings & workshops for Coalition & Phase II cities; Launch program website; Faith in Place Green Team rollouts; Recruit and convene Advisory Committee; Begin public engagement in design and evaluation; Market strategy for maximum customer acquisition	Convenings & workshops for Phase II cities; Green Team network; Advisory Committee meetings; Customer acquisition activities	Convenings & workshops for rural communities; Green Team network; Advisory Committee meetings; Customer acquisition activities	Convenings & workshops for rural communities; Green Team network; Advisory Committee meetings; Customer acquisition activities	Convenings & workshops for rural communities; Green Team network; Advisory Committee meetings

Specifically in Y1, the coalition intends to complete planning work using the following timeline:

The coalition intends to deliver a revised workplan within 365 calendar days of the receipt of funding for Y1 planning from EPA. Throughout the planning period, the coalition will leverage the DOE technical assistance to expand SolSmart, address interconnection issues, and connect with others working to expand solar access to low income and disadvantaged communities. This could include encouraging utility partners to activate the tools and expert resources available from the Department of Energy's i2x Technical Assistance program to improve their data collection, interconnection queues, and understanding of their challenges while innovating solutions to common interconnection challenges for distributed solar.

SECTION 5: REPORTING REQUIREMENTS

To meet reporting requirements as stated in the Terms & Conditions as well as to ensure a continuous feedback loop for overall improvement, the coalition will use the Y1 Planning Period to post a Request for Information (RFI) and/or RFP for a contracted external evaluator. Due to the complex nature of a Solar for All evaluation (i.e., measurement of program activities, climate and air pollution benefits, and market transformation) and the coalition's need to create robust and compliant (1) performance reports and (2) transaction-level and project-level data, the RFI process will allow the coalition to better articulate a subsequent RFP (and perhaps see if the evaluation should be split into multiple contracts). IN-CAA will develop and release the RFI and RFP and adhere to all EPA procurement requirements, and the RFP process will follow standard procedures. Respondents will be asked to submit a Technical Proposal (i.e., a preliminary evaluation plan for Solar Opportunities Indiana) and Cost Proposal.

The coalition will submit the following information as part of its reporting:

- **Administration Reporting:** In coordination with IN-CAA, the coalition will submit detailed financial reports in accordance with contract Terms and Conditions upon award. These reports will cover the expenditures of IN-CAA and all subrecipients, contractors, and program beneficiaries. Additionally, the project team will secure an audit of its financial records from an independent auditor when the project expends $750,000. The team will submit Form SF-SAC and Single Report package within nine months of the conclusion of the fiscal year or within 30 days of the completion of the external audit. Both the audit and from SF-AC will be submitted via the Federal Audit Clearinghouse's Internet Data System.
- **Financial Records Retention:** The coalition will retain all necessary financial and statistical records in accordance with 2-CFR 200.334, along with pertinent supporting documents, and all other non-federal entity records for a period of no less than three years following the final expenditure report.
- **MBE/MWE Utilization:** If required, the project team will submit an MBE/MWE "Utilization Under Federal Grants and Cooperative Agreements" form 5700-52A form on an annual basis.
- **Real Property Status Report:** The project team will submit a "Real Property Status Report" (SF-249) to report real property or request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e., purchased or constructed) in whole or in part under a federal financial assistance award.

Program Evaluation: The evaluation plan will adhere to EPA's Policy for Evaluations and Other Evidence-Building Activities, utilizing a two-pronged approach:

- First, it will assess the success of the four program strategies: 1) comprehensive, statewide workforce development, 2) small business support, 3) extensive public outreach, and 4) coordination with utilities.
- Second, the evaluation will also assess the extent that the program achieves the target outcomes and outputs across three areas: 1) Climate and Air Pollution Benefits, 2) Equity and Community Benefits, and 3) Market and Transformation Benefits

All data will be collected in accordance with the EPA's Enterprise Data Management Policy, emphasizing that data are discoverable, understandable, accessible, usable, and reusable by internal and external users. Prior to gathering data from potential and current grantees, the evaluator will receive confirmation that all data are qualified as exempt research (as it will be used for program improvement) by the EPA Human Subjects Research Review Official (HSRRO) before any work involving human subjects research can begin. If HSRRO determines any evaluation activities are non-exempt, the evaluator will submit the appropriate application for human subjects research approvals. Lastly, all data and dissemination activities will be in alignment to the EPA's Scientific Integrity Policy. The evaluation team will consult with the EPA to ensure appropriate and accurate measurement and reporting of required outputs and outcomes as described in the notice of funding opportunity.

Though the detailed scope of the evaluation plan will be determined by the contracted evaluator in discussion with the coalition, the evaluation will include a census of all SOI applicants, continuing through the duration of the grant. The census will survey household needs and characteristics (i.e., race/ethnicity, income, number of household members, dwelling type, etc.), ensuring that any grants or assistance reach diverse households in urban, suburban, and rural areas. Additionally, the coalition will develop a comprehensive strategy to calculate household savings during Y1, taking into account the varying types and needs of the households to be served, including those without individual electricity bills. The program team will benefit from the expertise of SUN and IEIF to collect and report average energy costs across targeted census tracts to assess the reduction in dependence on fossil fuels for energy production and the extent to which neighborhoods are able to benefit from community solar projects. The evaluation plan will provide valuable insights for continuous improvement, accountability, and informed decision-making.

In service to data transparency, dissemination, and rapid-cycle adjustment of strategies (when data indicate that implementation may necessitate adjustment), the coalition will develop a data dashboard that serves as a real-time tracker of both required outcomes and outputs (detailed in Section H of the NOFO)—reported quarterly when possible or at least yearly depending on the availability of data. As part of reporting requirements, coalition partners will provide data for the dashboard and the evaluator will be responsible for creating data visualizations and data tools in a publicly digestible format. To support reporting requirements, the evaluator will submit semi-annual and annual reports to the coalition that detail the outcomes and impact of SOI financial assistance and program activities.

One of the key distinctions of the coalition is its focus on local collaboration with community members and relevant community-based organizations. Subsequently, the qualitative part of the evaluation will focus on gathering implementation experiences with respect to the four program strategies. We will draw on a variety of data sources, including community meeting notes and attendance, experiences with other outreach channels such as the Indiana Solar Equity for All Alliance (including NAACP), ECI, and

SUN to name a few. Following best practices for community-focused data collection, the evaluation team will collect feedback on residents' experiences in navigating the SOI program, accessing solar in their communities and households, as well as the reach and effectiveness of workforce development programs.

1. Performance Reports

Semi-Annual Report

The recipient agrees to submit semi-annual performance reports electronically to the EPA Project Officer within 30 calendar days after the semi-annual reporting period ends. The semi-annual reporting periods are as follows: July 1 to December 31; January 1 to June 30. The semi-annual performance report should cover activities from the preceding two quarters.

Final Report

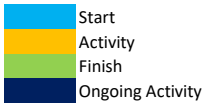
IN-CAA agrees to submit a final report in a format conducive for immediate public consumption. IN-CAA acknowledges that the final report must contain detailed narratives describing program performance for the entire period of performance, representing an overall assessment of the implementation of this EPA-approved Solar for All Workplan, supported with qualitative discussions and quantitative metrics. Additionally, IN-CAA acknowledges it will detail its program strategy and plans for performance reporting under the Closeout Agreement. IN-CAA acknowledges that it must include the following broad, non-exhaustive elements in its final report:

- Progress towards objectives on key performance metrics over the entire period of performance;
- Summary of key activities completed in the entire period of performance, including case studies across different types of financial assistance and project-deployment technical assistance undertaken to enable low-income and disadvantaged communities to deploy or benefit from zero-emissions technologies;
- Geographic coverage of financial assistance and project-deployment technical assistance deployed in the entire period of performance;
- Descriptions and examples of actions the program took over the entire period of performance to meaningfully involve the communities the program serves in program design and operations;
- Plans for key activities (including current transaction pipeline) to be completed as well as outputs and outcomes to be achieved under the Closeout Agreement.

IN-CAA agrees to submit the final performance report electronically to the EPA Project Officer no later than 120 calendar days after the end date of the period of performance.

2. Transaction-Level and Project-Level Data

IN-CAA agrees to submit semi-annual transaction-level and project-level data in accordance with information collection instruments approved through GGRF Accomplishment Reporting (EPA ICR Number 2783.01, OMB Control Number 2090-NEW). IN-CAA agrees to submit the transaction-level and project-level data electronically to the EPA Project Officer within 30 calendar days after the semi-annual reporting period ends. The semi-annual reporting periods are July 1 to December 31 and January 1 to June 30. The semi-annual transaction-level and project-level reports should cover transactions originated in the preceding two quarters.

Activity	Responsible Party	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25
Revise Workplan	Coalition																
Subawardee Agreements	Coalition																
Form and Convene Subcommittees	Coalition																
Inform Stakeholder Groups	Coalition																
Survey of Indiana Household Energy Insecurity	Coalition																
Develop a Customer Retention Plan	Coalition																
Convene Phase II Cities	Budget/Finance																
Determine Plan for Rural Communities	Budget/Finance																
Research Additional Financing Opportunities	Budget/Finance																
Develop Community Benefits Plan and Draft Template Community Benefits Agreements	Community Solar																
Develop Plan for Training on Equitable Solar Policy Principles	Equity/Justice																
Develop Outreach Plan	Outreach/Communications																
Develop and Launch Program Website	Outreach/Communications																
Green Team Rollouts	Outreach/Communications and Faith in Place																
Develop Requests for Proposals to Leverage Resources	Procurement																
Develop Operations and Maintenance Plan	Procurement																
Develop Evaluation Plan, Select Evaluator, Refine Targets and Collect Baseline Data	Quality Assurance/Compliance																
Develop Resident-led Advisory Board	Resident-led Advisory Board																
Develop Strategy for Necessary Regulatory Activities (Including Interconnection Issues and Utility Coordination)	State Regulatory																
Subawardee Project Refinement*	Subawardees																
Design a Comprehensive Workforce Development Initiative with Small Business Support Services	Workforce Development																
Determine Workforce Development Project(s)	Workforce Development																
Occupational Needs Assessment	Workforce Development																

*Includes items such as staffing, scope refinement, feasiblity studies, grid capacity assessments, household savings calculations, refinement of financial subsidies, and site readiness activities