

DC Solar for All:

Implementation Plan to Scale Low- and Moderate-Income Community Solar + Storage Resilience Hubs in the District of Columbia

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For more information about the Inclusive Shared Solar Initiative, please visit <u>https://naseo.org/issues/solar/issi</u>.

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Executive Summary

The District of Columbia's Department of Energy and Environment (DOEE) has demonstrated that it can deliver solar benefits to low- and moderate-income (LMI) residents either with solar panels on their roof, through community solar subscriptions, or through in-kind or other direct benefits paid for with revenue generated by solar systems. So far, over 6,800 District residents have received benefits of around \$500 annually from the District's signature Solar for All (SfA) program since its inception in 2016 from over 25 MW of installed solar capacity.

In the SfA program, DOEE partners with organizations across the District to install solar on single family homes and develop community solar projects to benefit primarily renters and residents in multi-family buildings. All SfA participants should expect to see 50% savings on their electricity bill over 15 years and can be proud to have gone solar. In order to be eligible, one must be a District resident who earns at or below 80% of the Area Median Income (AMI). The program is considered a national leader and model but needs to scale substantially to reach its goal of bringing the benefits of solar energy to 100,000 LMI families in the District of Columbia by 2032. Key challenges stand in the way of such expansion, including administrative and enrollment burdens for subscribers, disincentives impeding full participation and benefits for residents of master-metered multifamily housing, and the need for grid upgrades to accommodate new solar interconnections to meet District goals.

The question DOEE now faces is how to scale the program to serve more residents, more easily, and in innovative ways that help the District adapt to climate change, providing multi-faceted benefits to LMI residents of the District. To do so will require DOEE to pursue two key objectives:

- 1. *Reducing administrative program barriers to entry for residents*. Achieving this goal will require DOEE to leverage key planning processes and explore program design adjustments across District and DOEE programs and divisions, including the SfA Program overseen by the Energy Administration and the Low Income Home Energy Assistance Program (LIHEAP) overseen by the Utility Affordability Administration; and
- 2. *Piloting resilience technologies like battery storage in community solar projects*. When paired with solar, such technologies provide a clean way to provide power even when the grid is down due to climate or other events, which are forecast to become more frequent in the years to come. These pilots are expected to inform the future creation of a "Storage for All" program for the District.

Through the technical and financial support offered by the Inclusive Shared Solar Initiative and building on extensive stakeholder engagement in LMI neighborhoods around the District, the District of Columbia team expects to reduce energy burdens for LMI residents, address barriers to and streamline SfA program enrollment, and support the development of innovative benefit delivery models, including a community solar-supported climate resilience center.

Inclusive Shared Solar Initiative

DOEE's efforts in this plan are supported by the Inclusive Shared Solar Initiative (ISSI), a multistate partnership coordinated by the National Association of State Energy Officials (NASEO) and the National Energy Assistance Directors Association (NEADA) with the goal of making community solar more accessible to LMI households through innovative partnerships between State Energy Offices, Low Income Home Energy Assistance Program (LIHEAP) offices, solar providers, utilities, community-based organizations, and other key stakeholders.

With support from the U.S. Department of Energy Solar Energy Technologies Office and guidance from an expert Advisory Group, ISSI provides a flexible framework, inspired by the New York Solar for All program, through which states can explore new, more inclusive, and more affordable models for community solar deployment in underserved communities. In addition to the Energy Administration and Utility Affordability Administration teams in the District of Columbia, teams of State Energy Offices and LIHEAP Offices from Wisconsin and Minnesota also participate in ISSI. Key activities to be undertaken by ISSI's state partners include:

- The formation of State Energy Office-LIHEAP Office partnerships focused on LMI community solar deployment;
- Thorough planning and stakeholder engagement to inform strategies to expand LMI access to community solar generation;
- The oversight and build-out of community solar pilot projects in each partner state to test new models for expanding LMI access and participation in community solar programs; and
- Dissemination of information, successes, and lessons learned to other states interested in advancing LMI community solar.

To learn more, visit <u>https://naseo.org/issues/solar/issi</u>.

DC's Community Solar Market and Policy Landscape

The District of Columbia's community solar landscape is marked by key strengths, including a strong policy and regulatory foundation from DOEE and other government stakeholders; dedicated public funding in the form of the Renewable Energy Development Fund; strong partnerships with stakeholders and organizations, thanks to dedicated DOEE staffing focused on liaising with communities and neighborhoods; and lower financial barriers for LMI residents to participate in the program (which is free of cost).

Enabling Laws

A suite of bills has supported the development of community solar development in the District, particularly through the Solar For All (SfA) Program. On January 18, 2000, the Retail Electric Competition and Consumer Protection Act of 1999¹ was signed into law, establishing net energy

¹ <u>https://code.dccouncil.us/dc/council/laws/13-107.html#%C2%A7118</u>

metering in the District. Its provisions were updated by the Community Renewable Energy Amendment Act of 2013,² which also allowed for community solar.

On July 25, 2016, the Renewable Portfolio Standard Expansion Amendment Act of 2016³ was signed into law. It established the SfA program to increase access to solar, particularly to low-income residents with high energy burdens, and to ultimately serve 100,000 District households using solar to reduce their electric bills by 50%.

On January 18, 2019, the CleanEnergy DC Omnibus Amendment Act of 2018⁴ was signed into law. It revised the Renewable Portfolio Standard (RPS) for the District to require electricity be sourced from 100% renewable energy by 2032, and 10% from locally generated solar by 2041. The RPS is the primary incentive encouraging solar development in the District, including the SfA program.

The Renewable Energy Portfolio Standard Act of 2004 established the Renewable Energy Development Fund (REDF),⁵ the primary funding source for the SfA program. It is funded primarily from the collection of payments from energy suppliers for complying with the RPS. These payments generate on average between \$10-20 million per year.

Solar for All: Program Basics and Processes

The SfA Program enables many LMI District residents to access clean solar power options.

Subscription Processes

There are two main pathways to subscribe to SfA. First, recipients of LIHEAP benefits as well as current recipients of Clean Rivers Impervious Area Charge Relief (CRIAC), a District water assistance program, receive a mailer asking them to sign onto the terms and conditions of the program and provide their Pepco account information. If they return that mailer, they are enrolled in the program. Second, through a more complex process, a resident can apply to the program separately through DOEE's online application, or by sending a completed application by mail, email, or fax. If the resident who completed the application participates in a government benefit program like SNAP or TANF, lives in an income-qualified property, or receives utility assistance, they are qualified and enrolled once their qualifications are verified. If participation in a qualifying program cannot be verified, the applicant must complete the LIHEAP income qualification process. This process is being streamlined as DOEE is implementing a new application system for LIHEAP and all of its assistance programs this year that allows residents who apply for another assistance program to check a box indicating that they also want to enroll in SfA. Once the SfA module of that application system is complete, the residents who check that box will be directed to complete the additional steps necessary in the application to apply for SfA

² <u>https://lims.dccouncil.us/downloads/LIMS/29213/Signed_Act/B20-0057-SignedAct.pdf</u>

³ <u>https://lims.dccouncil.us/Legislation/B21-0650</u>

⁴ https://code.dccouncil.us/dc/council/laws/22-257.html

⁵ <u>https://code.dccouncil.us/dc/council/code/sections/34-1436.html</u>

benefits as well. In the interim, SfA will contact the residents directly to complete those additional steps.

An SfA benefit stays with the Pepco account as this is how Pepco allocates the benefit. If the subscriber moves to another address in the District, they can contact DOEE and be re-enrolled under their new account number. To cancel the subscription, the resident simply contacts DOEE or Groundswell (a program grantee) and requests to have their subscription terminated and their request is processed within the next billing cycle.

Customer Qualification, Recruitment, and Enrollment

DOEE administers the recruitment process for SfA. The primary means of recruiting and enrolling subscribers is through a direct mail campaign to existing LIHEAP participants. As the recipients of the direct mail campaign already meet the income qualifications for SfA, they just have to sign their name agreeing to the terms and conditions and provide their electric company account number so that the benefits can be provided on their electric bill. If a resident is not an existing LIHEAP participant, they must complete an SfA application, provide their electric company account information, provide a copy of their driver's license to demonstrate residency and identity, and demonstrate income eligibility through participation in a utility discount program, TANF, SNAP, LIHEAP, or reside in an income-covenant or income-restricted property. If an applicant cannot prove income qualification through those means, they must complete the LIHEAP benefit application. Once a resident is subscribed to SfA, DOEE transfers their name to program grantee Groundswell, who is charged with subscription management. Groundswell connects the resident's electric company account to a specific community solar project, and then allocates to that account a share of the energy from that project. Once that process is completed, DOEE enrolls that account in the community solar project through the electric company's online portal/webpage for managing community solar subscriptions. Enrollment complexity is a barrier to participation and will be one of the focus areas of DOEE's involvement in ISSI.

Costs and Funding

SfA is free to all income-qualified District residents who pay their own utility bill. DOEE also has a four-person outreach and engagement team that works to make it as easy as possible for residents to sign up for the program. Additionally, DOEE has worked closely with partner organizations that serve LMI residents to help spread the word about the benefits of SfA.

SfA is funded by the District's Renewable Energy Development Fund (REDF). Alternative Compliance Payments (ACP) paid by energy suppliers that operate in the District are deposited into the REDF. ACP payments must be made by energy suppliers if they do not meet their requirements under the District's Renewable Portfolio Standard (RPS) to purchase a certain amount of their energy each year from renewable sources, including solar located within the District. Funds collected into the REDF vary year-to-year and so far have ranged between \$10 and \$20 million per year.

LMI Participation, Targets, and Challenges

Utility Roles and Involvement

The Electric Company (Pepco) is responsible for interconnecting solar (and solar + storage) facilities onto the electric distribution grid and can impose costs and technical parameters for doing so in accordance with interconnection regulations set by the DC Public Service Commission (DCPSC). Pepco also allocates the "Community Net-Metering" (CNM) credits to subscribed residents, which is how the benefit from community solar systems is distributed for the SfA program. These credits appear on subscribed residents' bills on a monthly basis and account for their share of a community solar project. There have been issues with ensuring reliable and timely allocation of community solar benefits by the utility. These issues are being addressed in filings before the DCPSC.

Integration and Ownership of Renewable Energy Credits (RECs)

Solar Renewable Energy Credits (SRECs) are a key incentive for solar developers to build in the District. Under the current contract DOEE has with the DC Sustainable Energy Utility (DCSEU) to develop solar systems for SfA, the SRECs are retained by the developer as part of the developer's incentive to build the system and assign the energy generated to DOEE at no cost to deliver to SfA subscribers. Currently, DC's SREC prices at over \$400 are the most generous in the country.

Complementary Programs, Legislation, and Efforts

The District has been implementing its community solar program for several years. In addition to the above-mentioned SfA legislation establishing net metering and virtual net metering, a District-wide RPS, and a system of renewable energy credits, there are District laws, regulations and programs that provide for the following:

- A Property Assessed Clean Energy (PACE) financing program;⁶
- A property tax exemption for solar systems;⁷
- DC's recently established Green Bank,⁸ which has already funded an SfA project⁹

Additionally, the District continues to refine its interconnection rules through ongoing proceedings at the DCPSC and is particularly focused on improving connection timelines, cost transparency, and the implementation of the IEEE 1547-2018 Standard to expand hosting capacity. The District is also looking at implementing flexible interconnection agreements by using advanced inverter capabilities to increase hosting capacity and reduce the need for and cost of distribution system upgrades. Moreover, the District has aggressively worked to streamline its building permitting process for solar systems and typically completes the approval process within 10 days of receipt.

⁶ <u>https://dcpace.com/</u>

⁷ https://code.dccouncil.us/dc/council/code/sections/47-1508.html

⁸ <u>https://dcgreenbank.org/</u>

⁹ <u>https://dcgreenbank.org/construction-begins-on-walter-reed-solar-project-financed-by-the-dc-green-bank/</u>

LMI Access and Challenges to Community Solar

Since the inception of SfA, the program has leveraged the LIHEAP income-verification process. Through this process, the LIHEAP Office pre-qualifies households for the SfA program, either through verification of categorical eligibility or income verification. This has reduced the burden on potential applicants who are seeking utility assistance as they can be qualified for direct energy assistance, utility bill discounts, community solar credits, and weatherization at the same time. The LIHEAP program is situated within the Affordability and Efficiency Division which, in addition to energy assistance, also aids with water bills and the replacement of lead water service lines. As some of these programs have income guidelines as high as 100% AMI, the SfA program can also leverage these programs to identify potential clients.

To date, there are a little over 5,000 households enrolled in the SfA community solar program. All of these subscribers must have a household income of 80% of the AMI or less.

The target established in the statute for the SfA program is to have 100,000 District residents enrolled in the program by 2032. This number is roughly based on 85% of the total number of current District residents who earn 80% of the AMI or less. Achieving this goal would mean that the vast majority of LMI District residents would be subscribed to the program and receive the benefits of solar energy. Reaching this population is important for the District to meet its equity commitments and to help build a pathway to the middle class for all District residents. SfA can help increase the resiliency of District residents who currently have low and moderate incomes both from financial shocks and high energy burdens. The program can also provide them with access to the benefits of distributed solar energy, which serves a valuable climate adaptation function that can help blunt the effects of more frequent blackouts due to more extreme weather. That is why the pilot project to develop a climate resilience center in the District as part of the ISSI is such an important part of the future of the SfA program.

DOEE has addressed key challenges to LMI participation in SfA: for instance, initially, lack of adequate funds was the most significant challenge for LMI households to overcome for going solar. As a result, SfA is free for qualified residents.

Yet, other challenges persist. A significant number of residents in the target population live in buildings that are master-metered, so providing benefits to those residents requires creativity. DOEE provided innovation grants to several organizations to propose and implement different benefit delivery models, including direct cash payments and providing additional building amenities like a security guard or shuttle bus. Those models are now being implemented, and DOEE will continue to glean from them the best ways to provide benefits to households who do not receive an electric bill.

Many LMI residents receive Department of Housing and Urban Development (HUD) assistance, and the rent subsidies they receive can be impacted by how the SfA benefit is accounted for. Currently, housing providers who implement the housing assistance rules have communicated to DOEE that the reduction in utility costs as a result of SfA participation would affect residents' rent and utility allowance calculations, and they may have to pay more per month for rent and utilities if SfA credits are included in those calculations. DOEE would be interested in receiving technical assistance in order to find a benefit delivery model that works with HUD's rules, similar to how California's SOMAH program – which received a waiver from HUD – works, so residents are not penalized.

Additionally, there are some structural factors that affect solar development in the District generally and as such also apply to SfA. Those include the need for a modernized electric grid in the District to host the significant amounts of distributed solar that is planned (SfA could host as much as 300 MW of solar in the next decade) and the fact that there is a limited amount of real estate that can host solar in the District. The costs both in learning about solar and in forgoing the opportunity for other use and the complexities that owners of that real estate have to overcome can limit the amount of solar developed in the District and thus the amount available to SfA.

Finally, as a targeted government benefit program, SfA must connect with its target population to get them subscribed. This subscription process involves an administrative burden that requires work on both DOEE and the subscriber's part to overcome. DOEE's commitment is to make that burden as manageable as possible in order to attract subscribers while still complying with SfA's legislative mandate. DOEE employs a four-person team to conduct outreach and engagement with potential subscribers and is looking at adjusting administrative processes around income verification to make the sign-up process even easier and more accessible to a larger pool of households.

Strategies for Expanding LMI Access to Community Solar and Storage

DOEE is exploring different means of improving how and what types of benefits SfA delivers to LMI District residents. The following strategies will guide the ISSI-supported pilot projects seeking to expand access for LMI residents to the benefits of community solar.

Strategy 1: Advance Community Solar in DC Community Resilience Hub Program

The DC team will focus its efforts on a pilot project to develop a Community Resilience Center, which will combine solar and battery back-up systems to provide both community solar benefits during normal times and battery back-up services to allow for essential services such as phone-charging and medication refrigeration during emergencies and power-outages. This site would be placed in a location selected with community input and would be targeted to a community in the District with an identified need for such resilience services and a population of LMI residents that can receive the solar benefits during normal operations.

This strategy will also advance technical innovations. In particular, DOEE seeks to pilot advanced inverter-based solar systems combined with energy storage to increase solar hosting capacity and reduce the cost of interconnection, enabling more flexible solar interconnection that limits the need for distribution upgrades and expensive communications equipment currently being

required for most community solar projects. The capabilities of advanced inverter-based systems will increase solar capacity by allowing more flexible interconnection to the distribution system, while simultaneously providing more visibility to the distribution utility. Pairing solar with storage allows systems to be configured for limited or non-export back to the grid, reducing the impact on the distribution system. Lastly, DOEE is also interested in piloting non-wires alternatives, aggregating customer-sited solar systems so as to defer or displace the need for upgrades to the distribution system.

A target pilot project that DOEE will pursue with ISSI support will involve combining photovoltaic systems with batteries that would serve as a back-up energy source and provide greater resiliency for residents during electric outages, particularly during natural disasters. Climate Ready DC, the District of Columbia's plan to adapt to changing climate, calls on the District to create Community Resilience Hubs (CRHs). CRHs are community-serving facilities that provide information and services to communities before, during, and after emergency events. As climate change brings more flooding, heat waves, and severe storms, CRHs will complement existing emergency response services, and critically, serve the community year-round by promoting health, providing meeting spaces, educating the community about climate risks and how to prepare for them, and supporting workforce development. Resilient power systems are critical since the CRH will need to operate and provide services such as refrigeration, cell phone charging, and communications during outages.

DOEE is particularly interested in equipping community-serving facilities that are located at affordable housing developments to serve as CRHs. This would allow the District to provide residents access to affordable energy while benefiting the larger community. DOEE has held extensive discussions in Ward 7 in the District, the Ward most at risk from future climate impacts and most prone currently to power outages, about setting up a community resilience hub to serve the residents of Ward 7 to meet their current and future needs for access to resilient power. Through that process the residents identified the Faunteroy Community Enrichment Center (FCEC), a non-profit providing a variety of direct services to Ward 7 residents, as their preferred site for such a hub in Ward 7. DOEE has worked with the FCEC to help them secure funding through the federal appropriations earmark process to set up such a hub.¹⁰ DOEE also engaged American Microgrid Solutions to conduct a feasibility analysis of the FCEC site for the installation of a solar and battery storage system. DOEE has learned a lot from working on this effort with FCEC and will ultimately award funds for the construction of a solar and battery storage system to serve the needs of a community resilience hub to a site host that can both meet the needs and fulfill the trust of the surrounding community through use of the resilient power provided by the battery and storage system.

¹⁰ <u>https://norton.house.gov/media-center/press-releases/norton-announces-selections-for-community-project-funding-requests</u>

Strategy 2: Reduce Barriers to Entry for LMI Subscribers

As the State Energy Office and LIHEAP Office, respectively, DOEE's Energy Administration and Utility Affordability Administration will collaborate to investigate and reduce participation burdens that may impede LMI subscribers' access and full enjoyment of community solar benefits in the District. Specifically, the partnership will be critical in order to leverage the LIHEAP program and other District energy and utility assistance programs in combination with the SfA program to reduce energy burdens for LMI residents. The DC team will also address barriers to the SfA program enrollment, such as the HUD housing benefit program rules, to ensure broad access to solar energy benefits amongst LMI District residents.

The DOEE team will also engage other District agencies to develop a simpler enrollment process for qualified District residents to participate in the SfA program. In particular, DOEE has been in discussions with the DC Office of Tax and Revenue (OTR) about using tax records to qualify residents without them having to provide detailed proof of income. This will make it easier to sign up more District households, particularly residents who do not currently participate in another government benefit program. Currently, the District's SfA relies on income verification from LIHEAP and other government and utility bill assistance programs. Working with the tax office would provide income verification for the largest possible pool of District residents and make it easier for eligible residents to access the SfA program. OTR estimates that updating their database to allow DOEE to verify potential qualified subscribers in a batch format would cost \$120,000.

Strategy 3: Address Barriers for Master-Metered Multifamily Housing Residents

DOEE has received a waiver from HUD preventing rental increases or adjustments to utility allowances for SfA beneficiaries that either receive specific HUD benefits or live in housing that receives specific HUD subsidies. In the coming months, the DOEE team will be exploring program delivery and design adjustments needed to ensure positive outcomes and experiences for lowincome multifamily participants and will seek to receive technical assistance and share developments through ISSI and other peer-exchange channels.

Key Stakeholder Roles

DOEE employs four full-time staff whose job is to engage underserved and underrepresented communities and sign up residents from those communities for community solar. DOEE has targeted residents in Wards 7 and 8, where DC's most economically under-resourced communities live, and as a result, the majority of SfA subscribers live in those two Wards. DOEE has targeted those residents through address sorting for targeted direct mail, and prior to the pandemic through direct outreach. Discussion with residents at government benefit centers, where residents were already conducting business with the government, also occurred regularly prior to the pandemic. DOEE plans to continue these efforts and has formed strategic partnerships with organizations and other District agencies that serve these communities, such as churches, affordable housing providers, food banks, schools, and organizations that represent

or serve the Latino community. DOEE has advertised on the radio and in print media and conducted a mail campaign targeted to LIHEAP and CRIAC beneficiaries. DOEE has had all of their materials translated into the 8 primary foreign languages spoken in the District.

In addition to its continuous engagement of LMI stakeholders in target communities, DOEE's efforts to implement the strategies detailed in this plan will include a wide variety of strategic partners and stakeholders, whose roles are synthesized in the following table.

Implementing Partners	
DC Sustainable Energy Utility	• Develop SfA community solar and single -family solar facilities by sub- contracting with solar installers. Recruit and income-qualify single-family solar recipients
Groundswell (SfA Subscription Management Grantee)	Manage community solar subscriptions for SfA program
Pepco (Local Utility)	• Interconnect solar systems to the grid, and distributes benefits through billing system either through net-metering for single-family recipients or with bill credits for community solar recipients
DC Government Agency	v Partners
DC Public Service Commission	Utility regulator
Department of Employment Services (DOES)	Partner on Solar Works DC
Weatherization Assistance Program (WAP)	Funnel clients to SfA
Department of General Services (DGS)	Host SfA community solar installations
District of Columbia Public Library	 Host SfA community solar installations and provide information to customers on program
District of Columbia Housing Authority (DCHA)	Host SfA community solar installations and distribute in-kind benefits to residents
University of the District of Columbia (UDC)	 Host SfA community solar installations and distribute in-kind benefits to students
DC Office of Tax and Revenue (OTR)	Partner on addressing administrative burdens
Department of Human Services (DHS)	Help ease administrative burdens and recruit SNAP and TANF recipients
Department of Parks and Recreation (DPR)	Host recruitment events
DC Green Bank	Help finance SfA projects
Office of the Peoples' Counsel (OPC)	Ensure SfA customer benefits are received as they should be
Department of Consumer and Regulatory Affairs (DCRA)	 Issue permits for SfA projects, and ensure that SfA projects move through permitting expeditiously
Mayor's Office of Latino Affairs (MOLA)	Help with recruitment of Spanish-speaking District residents

Community Partners	
Chesapeake Solar & Storage Association (CHESSA)	Local solar and storage industry group
DC Solar Uniter Neighbors (DCSUN)	• SfA grantee and advocate organization for solar in the District
Faunteroy Community Enrichment Center (FCEC)	Community Resilience Hub Partner

Expected Project Outcomes and Future Plans

Should the CRH project be a success and should its development help to create a replicable model for the future development of other such projects, DOEE's goal in the Climate Ready DC plan is to have a CRH within walking distance of every District resident. The plan would be to continue to focus the development of CRHs in parts of the District most at risk from climate events, particularly Ward 7. DOEE is already engaged with our partners at DPR to work on developing potential projects at existing District recreation facilities and will continue that partnership and look to form others to build more CRHs, which helps both deploy more solar and battery resources but also increase the capacity of our communities to deal with emergencies and climate events.

With regard to the efforts to reduce administrative burdens for residents, DOEE's success working with HUD on the waiver for SfA beneficiaries that receive HUD assistance will materially reduce the administrative burden experienced by those beneficiaries. DOEE will continue to work with OTR and other parts of the District government to find ways to simplify the SfA application process. This will allow DOEE to continue to bring significant numbers of residents into the program into the future.