INCLUSIVE SHARED SOLAR INITIATIVE

Equitable Solar Access Project: Implementation Plan for Low- and Moderate-Income Community Solar Deployment in Minnesota

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This report was prepared in 2022 by Kellye Rose of the Energy Equity Program within the Minnesota Department of Commerce, in collaboration with Lissa Pawlisch of the University of Minnesota's Clean Energy Resource Teams. It functions as a plan of action to guide the development of an innovative community solar model which will be accessible to and inclusive of low- and moderate-income Minnesotans. It is developed with support from the U.S. Department of Energy Office of Energy Efficiency and Renewable Energy's Solar Energy Technologies Office through the Inclusive Shared Solar Initiative, a joint initiative among the National Association of State Energy Officials (NASEO), the National Energy Assistance Directors Association, and agencies in Minnesota, Wisconsin, and Washington, D.C. overseeing low-income clean energy programs.

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

Table of Contents

Executive Summary

Minnesota is a national leader in community solar garden (CSG) capacity and projects. CSG programs are offered by the state's main investor-owned utility, Xcel Energy, as well as by electric cooperatives and municipal utilities. However, challenges exist which hinder meaningful levels of participation by low- and moderate-income (LMI) households, such as program participation costs, eligibility and payment processes, and misalignment between CSG programs and the state's Energy Assistance Program (EAP).[1]

These dynamics have created an opportunity to make program changes and process adjustments that can create a lasting impact for LMI households' access to CSG across the state of Minnesota. Launched in early 2021, the Equitable Solar Access project has a goal of developing an innovative CSG model relying on the state's EAP network, structure, and client relationships to provide EAP-eligible LMI customers with greater and more affordable access to solar power options. Key aspects of this goal include:

- Improving LMI access by enabling any EAP-eligible customer to be eligible to receive energy credits from a CSG;
- Reducing developer/utility risk by positioning EAP-eligible households as the "anchor tenant" for a CSG project;
- Protecting consumers by having enrollment/subscription handled by the trusted EAP service providers and eliminating the need to engage with a new entity such as a third-party CSG developer; and
- Creating savings for EAP by introducing EAP payment changes that would lower billed taxes and fees and thus allow LIHEAP funds to reach more Minnesotans.

The strategy outlined in this *Implementation Plan* describes the current state of community solar in Minnesota and identifies a plan of action for achieving the above goal and objectives. Key next steps, which will ultimately inform the development of two LMI CSG pilot projects in underserved communities in Minnesota, include:

- Site identification and selection for the LMI CSG pilot projects;
- Identification and development of funding and financing options for LMI CSG projects;
- Determination of policy and process changes needed to cover CSG subscription costs with EAP benefits and update the utility billing process; and
- Oversight and tracking of CSG projects and LMI provisions and protections.

Additionally, as a participant in the Inclusive Shared Solar Initiative, the Minnesota team[2] will share its experiences, guidance, and findings with the Equitable Solar Access project with other State Energy Offices and LIHEAP agencies around the country.

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[1] This program is funded by U.S. Health and Human Services as part of the Federal Low Income Home Energy Assistance Program (LIHEAP).

[2] Minnesota's core project team includes the Minnesota State Energy Office, Minnesota Energy Assistance Program, Clean Energy Resource Teams (CERTs), EAP Service Providers and Community Action Partnerships, and the University of Minnesota Chan Lab. A description of the roles and responsibilities of each team member is described in the "Next Steps and Partner Roles" section of this report.

Inclusive Shared Solar Initiative

The Equitable Solar Access project is supported by the Inclusive Shared Solar Initiative (ISSI), a multi-state partnership coordinated by the National Association of State Energy Officials (NASEO) and the National Energy Assistance Directors Association (NEADA). The goal of ISSI is to make community solar more accessible to LMI households through innovative partnerships among State Energy Offices, 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 State Energy Office and EAP teams in the state of Minnesota, teams of State Energy Offices and LIHEAP Offices from Washington, D.C. and Wisconsin 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 two ISSI 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 https://naseo.org/issues/solar/issi.

Stakeholder Engagement Process

The *Implementation Plan* is based on extensive stakeholder engagement and informed by an examination of state- and locally specific barriers and opportunities to advance LMI CSG. The kick-off phase of stakeholder engagement began in 2021 with a series of five virtual meetings promoted to:

- Cities and tribal nations who participate in Green Step, a Minnesota sustainability best practice program (approximately 120 cities and native nations);
- Tribal nation governmental staff;
- Solar developers and interested solar actors, including advocates, researchers, and state agencies;
- Minnesota utility contacts including distribution cooperatives and municipal utilities as well as generation and transmission utilities, joint action agencies, and investor-owned utilities (about 100 individual utilities);
- All Minnesota Weatherization Assistance and Energy Assistance service providers (about 28 distinct Community Action Agencies, County Development Authorities, Tribal nation agencies, or non-profit agencies); and

- Community-based organizations and non-profits (about 75 contacts).

The initial full stakeholder group meeting on September 17, 2021, included a presentation to explain the ISSI Initiative and the EAP-Centric CSG model proposal and included discussions around guiding principles to be used in project development, project goals, development plan, and stakeholder involvement opportunities. The initial "all-call" group meeting was followed by a series of four focus-group meetings to allow further dialog between the core development team and stakeholders. These meetings helped further refine the team's strategy and were used to solidify commitments, participation, and responsibilities from stakeholders interested in being part of the development team moving forward. The focus group meetings were organized around four key stakeholder groupings:

- Community Action Agencies, Weatherization Assistance Providers, and Energy Assistance Providers
- Utilities and Solar Developers
- Community-based Organizations and Non-profit Organizations
- Tribal Nations, Cities, Counties, State Agencies

The team has also continued to hold "localized" calls with stakeholders who are interested in seeing a pilot project built at a specific location. These stakeholder engagements have informed how the Minnesota development team plans to assess sites for its ISSI pilot projects, namely, with the goal of locating CSGs in areas where there is not only strong support from the utility, EAP Service Provider, and local stakeholders, but also where there is high need for the assistance and access to CSG. The methodology used to categorize need in specific locations is discussed further on page 10, under Strategy 3 (*Strategies for Expanding LMI Access to CSG*).

Minnesota's Community Solar Market Landscape

Utility deployment of CSG in Minnesota is significant, positioning the state as a national leader in community solar. Yet, by generation capacity and by number of gardens, deployment is primarily concentrated within the territory of Xcel Energy, which is required by statute to operate a CSG program. Minnesota Power has opted to offer CSGs, and currently has two gardens (1MW and 40kW, respectively.) Consumer-owned utilities, such as cooperatives (co-ops) or municipal utilities, representing 18% of Minnesota's retail electric service and covering the vast majority (85%) of the state's geographic territory, may develop their own CSG programs under local authority. In total, 40 of Minnesota's more than 180 electric utilities have developed CSG programs.

Xcel Energy's Programs

The Xcel Energy CSG program model is unique compared to the other CSG programs deployed in Minnesota. Xcel Energy's CSG programs limit participation to gardens within the customer's county or an adjacent county. Nearly all the gardens in Xcel Energy territory are owned and managed by separate, third-party CSG companies. These companies develop the gardens and secure their own financing. There are no stipulations or restrictions on the overall maximum garden capacity that can be built (individual gardens cannot be larger than 1 MW), but Xcel Energy must approve the interconnection of the garden to the system, ensuring the system has

the capacity to absorb this generation. In addition to siting approval for interconnection purposes, Xcel Energy's primary role is to administer the bill credits on the customer's bill and ensure payment to the CSG-developer, with payment based upon the CSG's energy production. Subscribers enter into a separate agreement with the CSG company and pay CSG subscription fees direct to the CSG company. Subscriptions are generally a 25-year term, and specific subscription terms are determined by each of the individual third-party developers. Rates paid to CSG subscribers in Xcel territory are either Applicable Retail Rate (until 2017) or Value of Solar (after 2017). Rates paid are administered by Xcel Energy with oversight provided by the Department of Commerce and the Public Utilities Commission.

Contract terms vary across developers, but all CSG companies typically include provisions addressing the items delineated below (associated fees vary by program):

- Transfer of subscription to another subscriber (may include a fee)
- Subscriber moving to a new address within Xcel Energy territory (likely no fee attached)
- Subscriber moving out of the utility territory (varies, but may include a fee)
- Exit terms will vary by the specific CSG-development company:
    - Death of subscriber (no fee)
    - Early cancellation of subscription (will likely include a fee)

Subscribers in Xcel gardens receive, and need to manage, separate utility and CSG bill statements, with savings accruing to the subscribers when the CSG subscription bill credit is greater than the CSG subscription fee. This approach was designed to deliver immediate savings to a participating customer, and it largely does so, but subscribers must be cognizant of the potential for savings degradation to occur over time if the customer's subscription fee escalates faster than the production benefits.

Non-Xcel Programs

Programs at all other utilities are developed, governed, and administered by the specific utility itself, with these programs designed to be "premium priced" products. The utility in a specific territory determines whether or not to offer a CSG program. While these programs may benefit from third-party ownership as part of the financial model, they are only nominally owned by external parties for a set number of years (generally seven) until ownership is transferred to the utility at the defined fair market value.

Cooperative and municipal utility CSG programs are designed primarily for residential customers, while Minnesota Power offers the CSG program to both residential and institutional customers. Subscriptions to cooperative-owned CSG programs are typically 20-year terms, while the subscription terms offered by municipal utilities vary greatly, from one to 20 years, depending on the age of the garden. Some municipal utility owned programs allow subscribers to annually opt in or out of a CSG subscription. Customers and members in non-Xcel programs see both the CSG subscription charge and the production credit on their electric utility bill. Renewable energy credits or attributes are typically acquired by the subscriber, and consumer protections are in place to allow customers to transfer subscriptions, whether to a new address within the territory, back to the utility, or to another customer in the same territory.

LMI Provisions and Considerations

In 2019, Xcel Energy announced the Income-Qualified Solar*Rewards Community program to increase low-income households' access to community solar. Included in the new program was a provision to incentivize community solar developers to serve low-income customers on new gardens by offering a $.50/W upfront payment and $.06/kWh production incentive for subscribers. This new rule allows accrual of benefits to both residential subscribers and entities aiding LMI households. Participating organizations must prove their operational focus is low-income assistance and that at least 50% of the organization's constituents meet LIHEAP or WAP eligibility criteria.

Among non-Xcel programs, aside from Minnesota Power, few CSG programs include provisions to encourage low-income subscriber participation. As premium price programs, most of the municipal or cooperatively owned CSG subscriptions are not accessible to low-income Minnesotans. However, some cooperative utilities, in a few programs, do offer subscriptions to low-income households for no cost. Minnesota Power is unique amongst all utilities, in that they have established a grant program to support development of solar installations by community organizations, which can then pass the net metering credits, or energy cost savings, to LMI-focused organizations or households within the community. This program is not targeted solely on CSG but has, and will continue to, offer funding to LMI CSG. Funding for this program has just been re-authorized until 2024.

The largest number of Minnesota's operating CSGs are in Xcel Energy territory, and the bulk of these projects rely on outside financing. These CSG developers require credit score checks for potential subscribers, creating a barrier for LMI participation. One CSG developer has developed a model to work around this challenge though the use of back-up subscribers, but this approach is limited, and the additional complication dampens developer interest in targeting increased LMI participation. Developers face higher administrative and marketing costs needed to secure residential subscribers in the first place, and their fear that low-income subscribers may carry a higher-risk of turn-over creates a disincentive for developers to focus their efforts on income-eligible households. Challenges having to do with the methodology of the LIHEAP benefits calculation, and the timing of those payments, have also created barriers to an increased low-income participation rate in CSG. For cooperative and municipal utility owned CSG, the limited size and scope of projects are key challenges as is their premium price structure.

Policy and Regulatory Landscape

Net metering, or other energy compensation for excess generation from Qualifying Facilities, is regulated by the Public Utilities Commission, and policies are filed in each utility's specific tariff. Minnesota has a net metering policy in place for all utilities. Compensation rates paid to subscribers vary by program and depend on several factors, including the size of the system, specific costs and retail rates for the governing utility, and the type of utility (cooperative, municipal, or investor-owned). Minnesota Power and a few municipal and cooperative utilities

offer options to provide compensation to CSG subscribers as a kWh credit, rather than a dollar credit, based on the subscriber's share of energy generation.

Certain restrictions on CSG development have caused some organizations to develop alternative approaches to CSG as workarounds to the existing policy. For example, while only the utility can develop a program within the territory of a cooperative or municipal utility, some of these utilities have not demonstrated a desire or plan to do so. Non-utility organizations, instead, have developed behind-the-meter net-metered systems (40kW) and use the annual true-up to cash-out the excess bill credits and then allocate the funds as energy assistance payments for qualified households. Two tribal nations, the Leech Lake Band of Ojibwe and the White Earth Nation have utilized this approach.

There were several legislative proposals under consideration during the 2021 legislative session which aimed to increase consumer protections in the Minnesota CSG marketplace and remove operating restrictions on CSG within Xcel Energy territory, making participation more accessible to Minnesotans overall. The proposed bills, if passed, would have:

- Implemented a basic Solar Customer Bill of Rights;
- Eliminated the contiguous county requirement for CSGs within Xcel Energy territory;
- Altered the compensation rate for CSGs within Xcel Energy territory;
- Increased the 1MW size-restriction for CSG within Xcel Energy territory; and
- Circumvented or removed the barriers for development on closed landfills due to General Obligation bond requirements.

With the 2022 legislative session just beginning, it is unknown at this point if the CSG-related proposals will be re-introduced for consideration.

Strategies for Expanding LMI Access to CSG

Minnesota's unique market landscape and the stakeholder engagements conducted by the Minnesota team have shed light on key strategies that can help expand LMI access to CSG projects and programs around the state:

Strategy 1: Leverage the EAP network and resources to reduce burdens and barriers on LMI CSG participants

In the ISSI-supported CSG pilot projects, the Minnesota team will design a system whereby EAP-eligible households in proposed CSG territory will automatically qualify as eligible low-income CSG participants. Community Action Partnership (CAP) agencies who are currently EAP service providers will identify, enroll, and manage EAP-eligible households in the CSG program, and manage the distribution of the energy credits to these participants. EAP Service Providers are already in a trusted relationship with EAP-eligible clients. Building on this trust relationship increases the likelihood of EAP-eligible clients understanding and participating in what could be viewed as a complicated, hard-to-understand program. Having EAP Service Providers manage enrollment and subscription allows CSG developers and utilities to consider the EAP-eligible participants (as a group) to be an "anchor tenant," reducing the acquisition costs for the CSG

owners and eliminating the perceived "turnover risk" that prevent many garden developers from ensuring LMI accessibility to their CSG offering. The "anchor tenant" role would come into play if one or both of the pilot projects utilize a "carve-out" approach where a certain amount of capacity from a large utility-scale garden would be fulfilled by the EAP-client group. In a scenario where a smaller CSG is built specifically for this project, the associated generation would be fully dedicated to the target EAP-eligible market.

Strategy 2: Adjust EAP policy to include CSG subscription cost as a household energy cost factored into the calculation of Energy Assistance benefit payments.

In July of 2021, and because of the early discussions surrounding the ISSI project development, the EAP policy was modified in two ways:

1) The policy now allows LIHEAP funds to cover CSG subscription costs on behalf of EAP-eligible households. To implement this change, EAP Service Providers will facilitate the payment of EAP benefit-payments to CSG developers to cover subscription costs.
2) The policy now allows the inclusion of CSG subscription costs as a cost of energy-purchase, when calculating the energy assistance benefit payments to EAP program participants.

These two changes will have the most effect in Xcel Energy service territory, where CSG subscribers and participants receive bills from both the utility and the CSG operator. Prior to these policy changes, a household's electric bill would have appeared low because of the CSG credit, but the cost of achieving those lower usage numbers would not have been fully accounted for in calculation of the energy assistance benefit payments. Low-income CSG subscribers in the Xcel service territory were at risk of reduced energy assistance payments, as benefits calculations where set based off utility bills without consideration of the CSG subscription costs.

While the on-going Minnesota ISSI-project development work is centered on siting and locating the ISSI pilot projects in non-Xcel service territory (see Strategy 3 below), this EAP policy change is a direct result of the ISSI project already benefitting low-income CSG participants in Xcel Energy service territory.

Strategy 3: Focus Efforts in Non-Xcel Territory

In Xcel Energy territory, projects are developed, owned, and managed by third parties. Outside of Xcel Energy territory, utilities control the development of gardens within their territory. The team intends to focus on working with cooperative and municipal utilities. These utilities do not have to file tariff changes with the Public Utilities Commission, a barrier cited in initial conversations with investor-owned utilities, and therefore pilots will be able to move forward more quickly once local decisionmakers are on-board.

Local development teams will include utility and EAP Service Provider representatives and may also include representatives from the following, as appropriate for the site: local or tribal governments, economic development agencies, solar developers, and community-based

organizations. As the list of potential sites for pilot projects is narrowed down, a series of meetings will be scheduled for core and local team members to explore financing possibilities and options. The series of meetings will include conversations with financial experts participating on the ISSI Technical Team, staff from utilities, both in Minnesota and other states, who have developed low-income focused CSG; and solar developers and other financial capital firms working in the low-income or non-profit solar market.

Strategy 4: Credit CSG-Participation Benefits as a kWh Credit Rather than a Dollar Credit.

Equitable Solar Access CSG-subscriber households will receive benefits from production as a kWh credit, rather than a dollar credit, on their electric bill. This adjustment would apply the credit to the kWh usage on the bill, prior to the addition of taxes and fees, an approach which would eliminate the taxes and fees charged on the dollar value of the credited kWh. EAP dollars would therefore not be used to pay taxes or fees and could be reassigned to cover energy assistance benefit payments for additional Minnesotans.

Strategy 5: Assess ISSI CSG Pilot Site Options Based on Local Priorities and Needs

Within this non-Xcel territory focus, the Minnesota site development team will examine potential sites for the ISSI-supported CSG projects based on not only local interest and buy-in, but also on need, evaluating the following matrix of metrics and factors:

- Opportunity Zone classification (used as an overall indicator of need);
- Social Vulnerability Index (used as an overall indicator of need);
- Percent BIPOC (Black, Indigenous, People of Color) population;
- Percent of population in poverty (at or below 100% of Federal Poverty Level);
- Household energy burden for households in poverty;
- Percent of population qualified for EAP participation (at or below 200% Federal Poverty Level); and
- The number of manufactured homes in the census tracts. (Residents of manufactured homes are normally unable to add residential solar to their households, and siting garden projects near these parks would increase these residents' access to solar energy.)

Strategy 6: Pursue Opportunities for Broader Impact

In addition to the important work of testing new LMI participation models through the two pilot projects, the Minnesota team will pursue opportunities for broader applicability and impact of their work on the Equitable Solar Access project, beyond the pilot projects that will be developed in the coming months. Potential avenues include:

- Informing utilities of lessons learned, such as: opportunities to streamline customer bills, alternatives to credit checks or fees, and ways to utilize CSGs in support of EAP-eligible households.
- Engaging financial institutions through ISSI to discuss Minnesota's efforts to mitigate perceived risk in LMI CSG projects, which may in turn attract more capital to future projects; and
- Disseminating experiences and informing other states' efforts through ISSI, to advance more LMI CSG efforts nationally.

Partner Roles and Next Steps

To execute the strategies described above, the Minnesota team includes multiple important partners tasked with developing analyses, making program and policy adjustments, engaging stakeholders, and overseeing the build-out of the ISSI pilot projects, as well as a broader stakeholder network that will be tapped to inform implementation throughout the course of the project.

A breakdown of roles and responsibilities is synthesized in the table below:

Core Team of the Equitable Solar Access Project

Minnesota State Energy Office (SEO)	• Oversee and guide work necessary to accomplish goals of project in accordance with project timeline; Create stakeholder awareness of project and goals, build appropriate project team • Develop, in conjunction with other team members, the processes needed to offer this model(s) • Work with utilities, EAP, and other partners to facilitate the use of virtual net metering for CSG subscribers, and address processing of kWh credits on utility billing system • Assist in siting CSGs, working with other partners/state agencies as needed; Develop/offer input on development of appropriate educational materials and processes to reach and educate potential program participants • Work through requirements relating to "public good" and bond funding for any development on public lands, as necessary • Seek/build alignment and coordination between ISSI pilot projects and any current solar PV / CSG undertakings planned by other state agencies
Minnesota Energy Assistance Program (EAP)	• Delineate analysis needs to support decision-making regarding how program should be structured • Implement EAP policy changes necessary to cover CSG subscription costs with LIHEAP benefit payments and reduce energy costs of EAP-eligible households • Develop/offer input on creation of appropriate educational materials and processes to reach and educate potential program participants • Work with SEO/utilities on any potential changes to utility billing process to credit CSG benefits as kwh credits
Clean Energy Resource Teams (CERTs)	• Develop and test appropriate education materials and process to reach and educate potential program participants in conjunction with CAPs, other assistance providers, and SEO • Coordinate and facilitate team meetings • Assist with efforts to directly engage low-income households • Communicate and coordinate with Chan Lab regarding analysis needs • Assist with development of the process needed to offer this model
Assistance Providers (EAP Service Providers, Community Action Partnerships, etc.)	• Develop/offer input on development of appropriate educational materials and processes to reach and educate potential program participants • Determine eligibility and enrollment for CSG subscriptions benefits while maintaining client confidentiality • Manage CSG subscriptions • Potential as CSG owner and/or host-site

University of Minnesota Chan Lab	• Undertake analysis and modeling to support these processes and understand proposed organization structures, ownership and financing pathways, and potential criteria for targeting household participation in the pilots • Assist with development of the process needed to offer this model

Key Stakeholders of the Equitable Solar Access Project

Community-based Organizations (low-income-focused)	• Provide input on the needs and interest of the target low-income (LI) audience • Develop/offer input on development of appropriate educational materials and processes to reach and educate potential program participants
Government (Tribal, County, City, Township, other State Agencies)	• Provide input on the needs and interest of the target LI audience • Develop/offer input on development of appropriate educational materials and processes to reach and educate potential program participants • Assist in determining host-site and ownership of pilot project(s) • Assist with addressing local governmental regulations or stipulations, if needed
Utilities	• Work with the project team to inform model development for future scalability • Assist in development of innovative financing paths, ownership structure or PPA structure for sustainability of the model • Work with the solar developer (as appropriate) to develop and implement the project • Track energy produced from array and allocate to participants • Implement bill adjustments necessary to apply CSG shares as kWh credits to bill (pre-tax and fees), rather than as dollar credits on gross bill • Fund or assist in acquisition of funding for pilot project development
Solar Developers	• Assist in development of innovative and sustainable financing paths, ownership structure & PPA structure • Develop and implement CSG pilot projects once site is determined • Fund or assist in acquisition of funding for pilot project development
Other interested parties (third-party investors, etc.)	• Assist in development of innovative financing paths, ownership structure or PPA structure for sustainability of the model • Fund or assist in acquisition of funding for pilot project development • Assist in siting of pilot project(s) • Assist with addressing local governmental regulations or stipulations, if needed