



August 18, 2023

Acting Director Jahi Wise
Greenhouse Gas Reduction Fund
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 1101 A
Washington, DC 20460

Re: Clarification Requested: “Enabling Infrastructure” Meaning in Distributed Generation and Storage Priority Project Type, National Climate Investment Fund (NCIF) and Clean Communities Investment Accelerator (CCIA)

Note: *The Alliance to Save Energy does not anticipate competing for a GGRF award*

Dear Acting Director Wise:

Thank you for your continued leadership in the development and implementation of the Greenhouse Gas Reduction Fund (GGRF or Fund). The Alliance to Save Energy is looking forward to the application and award process, and the outsized impact that Fund investments will have in low-income and disadvantaged communities. As a clarifying question related to the term “*enabling infrastructure*” as that term is used in the *Priority Project Categories* under *Distributed Energy Generation and Storage*, in the National Clean Investment Fund (NCIF), and the Clean Communities Investment Accelerator (CCIA), the Alliance writes to seek clarification that the term has the same or similar meaning as the term “*Enabling Upgrade*”, as provided in the *Solar for All* Program.

Under the *Solar for All* program, “*Enabling Upgrades*” are defined as “Investments in energy and building infrastructure that are necessary to deploy and/or maximize the benefits of a residential rooftop and residential-serving community solar project. Enabling upgrades can include, but are not limited to, electrical system upgrades, structural building repairs and ***energy efficiency***.”¹

A similar term, “enabling infrastructure” is provided in NCIF and CCIA, specific to the priority project category *Distributed Generation and Storage*, however the Request for Application (RFA) does not provide the term’s meaning.² According to the NCIF and CCIA RFA, *Distributed Energy Generation and Storage* are “[p]rojects, activities, and technologies that deploy small-scale power generation

¹ Environmental Protection Agency, Office of the Greenhouse Gas Reduction Fund, Funding Opportunity Title: Solar for All, p. 9, *emphasis added*.

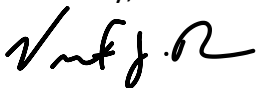
² See U.S. Environmental Protection Agency, Office of the Greenhouse Gas Reduction Fund, Funding Opportunity Title: National Clean Investment Fund (NCIF) p. 10; and Funding Opportunity Title: Clean Communities Investment Accelerator, p. 11.

and/or storage technologies (typically from 1 kW to 10,000 kW), **plus enabling infrastructure necessary for deployment of such generation and/or storage technologies.**³

“Enabling Upgrades” in *Solar for All* specifically include energy efficiency, and in NCIF and CCIA, EPA explains that the *Distributed Energy Generation and Storage* “priority project category is intended to make an outsized impact on delivering clean energy **and energy efficiency** benefits to low-income and disadvantaged communities.”⁴ The Alliance request that EPA clarify that energy efficiency is included as “enabling infrastructure,” similar to how energy efficiency is defined as an “Enabling Upgrade” in *Solar for All*, but necessarily expanded to include all built environment project types relevant to the priority category, including residential, commercial, industrial, and others.

Thank you for the opportunity to present this clarification question for consideration. The Alliance greatly appreciates your leadership on these important issues, and we look forward to working with you on the Greenhouse Gas Reduction Fund going forward. Please let me know if you have questions or need additional information.

Sincerely,



Vincent J. Barnes

Senior Vice President, Policy Research, and Analysis
Alliance to Save Energy

³ *Id.* *Emphasis added.*

⁴ *Id.* at Funding Opportunity Title: National Clean Investment Fund (NCIF) p. 11; Funding Opportunity Title: Clean Communities Investment Accelerator, p. 12, *emphasis added*).