



# **Program Guide for Solar Electric Allies**

**Developed by Energy Trust of Oregon**

## **Part 6: Equitable Solar Initiative**

## 6.1

### Overview

#### *Diversity, Equity and Inclusion*

Energy Trust believes it has a responsibility to ensure that all customers can directly benefit from its services, including people with low and moderate incomes, communities of color, and rural communities. This program guide chapter describes efforts that are part of a larger strategy to improve and enhance offerings for underserved customers across the state. For more information, and to view Energy Trust's *Diversity, Equity and Inclusion (DEI) Plan*, please visit our [website](#).

In support of Energy Trust's DEI Plan, the Solar Program formalized the **Equitable Solar Initiative** in 2019. Utilizing several approaches (detailed below), the initiative supports our goals of fostering an equitable solar market and striving to ensure that all ratepayers in Oregon benefit from solar.

- **Community Engagement:** Program initiatives and strategies have been informed by input from Energy Trust's Diversity and Renewable Advisory Councils, strategic interviews and focus groups, working groups, engagement workshops, and federal grant participation. Energy Trust has established ongoing relationships with various community-based organizations to continue to guide work in this space. We value input from these important partners.
- **Education and Outreach:** Energy Trust conducts regular education, marketing, and outreach to provide information and potential solutions to stakeholders and customers. As the solar market continues to evolve and customer audiences become more focused, Energy Trust continues to evolve the necessary messaging and outreach strategy to reach customers most effectively. The unbiased role we play in the industry supports all ratepayers.
- **Consumer Protection:** Energy Trust's closed network of qualified Solar Trade Allies and the program's design review and installation verification procedures help ensure that our customers' solar installations perform as expected for the life of their systems. Such measures are even more important when they are applied to underserved or vulnerable populations.
- **Focused Incentives:** By acknowledging institutional inequities and in service of organizational goals, Energy Trust can offer additional focused incentives to help reduce the barriers to going solar for certain customers. These include low- and moderate-income customers, communities of color, rural communities, and those serving them.

#### 6.1.1 Trade Ally Eligibility and Expectations

Except where otherwise noted, all Solar Electric Trade Allies are eligible to offer increased incentives as part of the Equitable Solar Initiative. In addition to adhering to all requirements set forth in [Part 2 of the Program Guide for Solar Electric Trade Allies](#), Trade Allies accessing incentives offered through the Equitable Solar Initiative are expected to model the highest standards as ambassadors of Energy Trust. The increased incentive funding supporting the Equitable Solar Initiative has been intentionally allocated from Energy Trust's budget in support of our organizational DEI goals, and is specifically targeted at expanding access and the benefits of solar to

communities that have not previously had access to it. It is important for participating Trade Allies to understand and model these goals.

Consistent with [Part 2 of the Program Guide for Solar Electric Trade Allies](#), the Trade Ally must remain a Solar Electric Trade Ally in good standing. Energy Trust may suspend eligibility to participate in accessing increased incentives, or other offers at any time for failure to abide by program requirements, or for any other reason in its sole discretion by providing written notice to the Trade Ally.

In addition to standard customer service expectations, Energy Trust requires all participating Solar Electric Trade Allies offering increased incentives as part of the Equitable Solar Initiative to comply with the following additional customer service standards:

- Trade Ally must respond to Energy Trust or customer requests in a timely manner and resolve application revisions and installation corrections within required timelines.
- Trade Allies must focus solar recommendations on what is most cost-effective for the customer;
- Trade Allies must show courtesy, honesty, integrity, objectivity, and fairness when interacting with customers and Energy Trust staff;
- Trade allies must not apply undue sales pressure or high-pressure sales techniques, and;
- If marketing door-to-door, Trade Allies must train individuals going door-to-door in local, state, and federal laws governing solicitation and obtain a local permit for solicitations, if required by the city or county.

## **6.2 Residential Incentives**

### **6.2.1 Solar Within Reach Overview**

House Bill 3141, the public-purpose charge modernization bill passed by the Oregon legislature in 2021, requires that 25% of the funding allocated to Energy Trust's renewable energy programs benefits customers with low and moderate incomes. In support of this requirement and to improve access to solar, Energy Trust offers higher **Solar Within Reach** (SWR) incentives for homeowners at or below 120% of state median income.

Solar Within Reach is ideal for customers who own homes in good condition, but for whom an investment in solar is financially just out of reach. It can also be a valuable component for new homebuilders who work with lower-income communities. This incentive offer was developed with expert input from more than a dozen community-based organizations, local governments, and others.

Solar Within Reach has three key features:

- Higher incentives to offset a greater portion of the upfront cost of a project;
- A subset of the highest-performing Solar Trade Allies who receive training and agree to higher service standards; and at times,

- Targeted marketing campaigns and collaboration with community-based organizations or new community developments.

Participating Solar Within Reach Trade Allies (see **Section 6.2.2** below) can submit applications for the higher-than-standard Solar Within Reach incentive rate for a residential project for a customer that meets the Solar Within Reach eligibility criteria outlined in **Section 6.2.3** below.

See **Section 6.2.4** below for additional Solar Within Reach application details. The final determination of eligibility for Solar Within Reach incentives rests with Energy Trust.

## **6.2.2 Solar Within Reach Trade Ally Participation Requirements**

In addition to adhering to the requirements described in **Section 6.1.1**, this section outlines additional Trade Ally eligibility requirements for Solar Within Reach participation. Only Solar Trade Allies that have applied and been approved by Energy Trust specifically for Solar Within Reach participation are eligible to offer Solar Within Reach incentives to qualifying customers. Current Solar Within Reach Trade Ally participation requirements include:

- 5-star Trade Ally rating (Trade Ally must maintain a rating of 5-stars to remain eligible to submit Solar Within Reach applications), or written approval from the Solar Program
- Complete a Solar Within Reach training. Sign and return the Solar Within Reach Contractor Participation Agreement and adhere to all stated customer service standards (Form 200SWR) for review and receive written Energy Trust approval for participation
- Confirm income eligibility of participating Solar Within Reach customers (see **Section 6.2.3**)
- Provide at least a 7-year full system workmanship warranty for eligible Solar Within Reach projects

## **6.2.3 Solar Within Reach Customer Eligibility Requirements**

Solar Within Reach incentives are intended to support moderate-income homeowners. Moderate-income is defined as earning 80-120% of state median income. Qualifying income levels are updated annually. Trade Ally contractors can access Solar Within Reach incentives on behalf of qualifying homeowners and builders of new residential construction for qualifying future homeowners. The home may be a single-family home, manufactured home, floating home, or multifamily residence that is either an attached side-by-side unit or a duplex, triplex or fourplex.

### *Homeowners*

Prior to performing any Solar Within Reach work or assessments, the approved Solar Within Reach Trade Ally must confirm income eligibility of the customer using Energy Trust's Solar Within Reach Income Verification (Form 210SWR). In addition, the customer must own their home to qualify for Solar Within Reach incentives. Only income-qualified customers are eligible to receive Solar Within Reach incentives. All other Energy Trust eligibility requirements for residential incentive program participation continue to apply.

### *Builders and New Residential Construction*

Prior to performing any Solar Within Reach work or assessments, the approved Solar Within Reach Trade Ally must confirm with the Builder representative the income eligibility of the end customer and future homeowner of the new residential construction using the Solar Within Reach for Builders Qualification Verification (Form 210B).

#### **6.2.4 Process and Required Documentation**

All Solar Within Reach projects must adhere to Energy Trust's [Solar Electric Installation Requirements](#), and a detailed list of required design documentation can be found there.

To apply for incentives, follow the standard incentive application instructions outlined in [Part 4 of the Program Guide for Solar Electric Trade Allies](#), and check the box for Solar Within Reach. This will enable the correct incentive rate and forms to be accessible in PowerClerk. Before an incentive can be reserved, a signed copy of the customer's Solar Within Reach Income Verification (Form 210SWR) **OR** Solar Within Reach for Builders Qualification Verification (Form 210B) must be submitted to Energy Trust, along with all other required incentive application documentation, as a part of the standard application process in PowerClerk.

The Solar Within Reach Trade Ally must itemize the Solar Within Reach incentive on the customer's invoice and provide it as an upfront discount on the customer's invoice. Energy Trust reserves the right to change incentives at any time.

## **6.3 Nonresidential, Institutional, and Multifamily Incentives**

### **6.3.1 Overview**

Helping the entities that serve and support lower-income customers, communities of color, and rural communities is an important way to overcome awareness barriers and foster access. As part of the **Equitable Solar Initiative**, Energy Trust offers increased incentives for eligible customers as a way of combatting some of the additional financial and market barriers to installing solar.

Solar Electric Trade Allies can submit applications for a higher-than-standard **Equitable Solar Initiative** incentive rate for a new solar project for an eligible nonresidential, institutional, or multifamily host customer that meets the Equitable Solar Initiative eligibility criteria outlined in **Section 6.3.2** below.

All of Energy Trust's program procedures for project application submission, review, installation, and verification apply for Equitable Solar Initiative projects. To access the increased incentive for an eligible customer project, Trade Allies must additionally submit an Equitable Solar Initiative Eligibility Attestation (Form 210SE), signed by the customer, with the application package. This form must be included at the time of incentive application submission and kept with the project record.

### **6.3.2 Additional Equitable Solar Initiative Customer Eligibility Requirements**

To qualify for increased incentives, the nonresidential, institutional, or multifamily customer (*System Owner if submitting a Form 220C, or Host if submitting a Form*

2207) must satisfy one of the additional eligibility criteria below, as indicated on the customer's signed Equitable Solar Initiative Eligibility Attestation (Form 210SE).

- **Tribal:** Owned and operated by one of the nine federally recognized tribes of Oregon
- **Affordable Multifamily Property:** An affordable multifamily property where at least 50% of the property's dwelling units associated with the project, are and shall remain dedicated for residents who are at or below 80% Area Median Income (AMI) for at least 10 years after project completion
- **Eligible Nonprofit Organization:** Owned and operated by a 501(c)(3) nonprofit organization that (i) is registered with the Oregon Secretary of State, Corporation Division, (ii) is not identified on the Oregon Department of Justice list of "Disqualified Charities," and (iii) has a stated mission and track record of delivering programs directly benefiting communities and individuals including, but not limited to, Black, Indigenous, and other communities of color, communities experiencing lower incomes, federally recognized Indian tribes, rural communities, coastal communities, communities with limited infrastructure, and other communities and individuals traditionally underrepresented in public processes and programs to incent and advance solar energy installations

Other eligibility requirements for program participation include:

- Electric utility must be Portland General Electric or Pacific Power
- Maximum project size: <360 kW-AC (about 480 kW-DC)
- Project cannot have an existing incentive reservation with Energy Trust
- Installation site may be existing or new construction
- Maximum incentive provided by Energy Trust shall not exceed 75% of the eligible Total Project Cost

### 6.3.3 Incentive Allocations and Availability

Nonresidential, Institutional and Multifamily Equitable Solar Initiative incentives are available on a first-come first-served basis and are subject to change and availability. Incentive rates will follow standard program procedures and will gradually reduce over time, however, due to Energy Trust's limited budget, these increased Equitable Solar Initiative incentives may not remain available year-round. Energy Trust will announce all available incentive allocations, rates, and project caps for increased incentives at the beginning of each calendar year.

Energy Trust will not maintain a waitlist. Trade Allies can monitor all incentive rates and availability by viewing the [Solar Status Report](#), which is updated weekly.

### 6.3.4 Process and Required Documentation

All Equitable Solar Initiative projects must adhere to Energy Trust's [Solar Electric Installation Requirements](#), and a detailed list of required design documentation can be found there.

To apply for incentives, follow the standard incentive application instructions outlined in [Part 4 of the Program Guide for Solar Electric Trade Allies](#), and check the box for Equitable Solar Initiative Incentives. This will enable the correct incentive rate and forms to be accessible in PowerClerk. Before an incentive can be reserved, a signed copy of the customer's Equitable Solar Initiative Eligibility Attestation (Form 210SE) must be submitted to Energy Trust, along with all other required application documentation, as a part of the standard application process in PowerClerk.