CONNECTICUT GREEN BANK℠

Joint Committee of the CT EE Board & CGB Board of Directors

Meeting Date

June 21, 2023

JOINT CGB/EEB COMMITTEE MEMBERS

Brenda Watson
Chair
Executive Director
Operation Fuel
(Green Bank Designee)

John Harrity
Chair
CT Roundtable on Climate and Jobs
(Green Bank Designee)

Melissa Kops
Project Manager, Architect
City of New Haven
Department of Engineering

Hank Webster
Vice Chair
CT Department of Energy and
Environmental Protection (DEEP)
(Ex Officio)

John Viglione
Office of Consumer Counsel
(EEB Designee)

AGENDA

Joint Committee of the CT Energy Efficiency Board and the Connecticut Green Bank Board of Directors

Online

June 21, 2023
1:30 pm – 3:00 pm

1. Call to Order
2. Public Comments (5 min)
3. Review and Approval of Minutes for December 21, 2022 (5 min)
4. Update on the 2023 Legislative Session (10 min)
5. C&LM Plan and Green Bank Comprehensive Plan – Reviews and Input (15 min)
    a. FY24 Green Bank Comprehensive Plan
    b. CY24 C&LM Plan
6. Opportunities and Challenges (30 min)
    a. Healthy Housing
        i. LIHEAP
        ii. Inflation Reduction Act
7. Other Business (20 min)
    a. Research and Development
        i. Clean Energy Jobs Study
        ii. Heat Pump – Market Assessment
    b. Other Business
8. Public Comments (5 min)
9. Adjourn

Join the meeting online at https://meet.goto.com/478217341

Or dial in using your telephone:
Dial: 1 (571) 317-3112 / Access Code: 478-217-341

RESOLUTIONS

Joint Committee of the CT Energy Efficiency Board and the Connecticut Green Bank Board of Directors

Online

June 21, 2023
1:30 pm – 3:00 pm

1. Call to Order

2. Public Comments (5 min)

3. Review and Approval of Minutes for December 21, 2022 (5 min)

Resolution #1

Motion to approve the meeting minutes of the Joint Committee for December 21, 2022

4. Update on the 2023 Legislative Session (10 min)

5. C&LM Plan and Green Bank Comprehensive Plan – Reviews and Input (15 min)

    a. FY24 Green Bank Comprehensive Plan
    b. CY24 C&LM Plan

6. Opportunities and Challenges (30 min)

    a. Healthy Housing
        i. LIHEAP
        ii. Inflation Reduction Act

7. Other Business (20 min)

    a. Research and Development
        i. Clean Energy Jobs Study
        ii. Heat Pump – Market Assessment
    b. Other Business

8. Public Comments (5 min)

9. Adjourn

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ANNOUNCEMENTS

- **Mute Microphone** – in order to prevent background noise that disturbs the meeting, if you aren't talking, please mute your microphone or phone.

- **Chat Box** – if you aren't being heard, please use the chat box to raise your hand and ask a question.

- **Recording Meeting** – we continue to record and post the board meetings.

- **State Your Name** – for those talking, please state your name for the record.

Empowering you to make smart energy choices

Joint Committee

Connecticut Energy Efficiency Board and the Connecticut Green Bank Board of Directors

Online
June 21, 2023

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Empowering you to make smart energy choices

Agenda Item #1

Call to Order

Empowering you to make smart energy choices

Agenda Item #2
Public Comments

Empowering you to make smart energy choices

Agenda Item #3

Approval of Meeting Minutes for December 21, 2022

Resolution #1

<u>Resolution #1</u>

Motion to approve the meeting minutes of the Joint Committee for December 21, 2022

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Empowering you to make smart energy choices

Agenda Item #4

Update on the 2023 Legislative Session

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Agenda Item #5a

C&LM Plan and Green Bank Comprehensive Plan

FY24 Green Bank Comprehensive Plan

Connecticut Green Bank
Comprehensive Plan – Green Bonds US

- **Focused Implementation**
  - RSIP – from target (CGS 16-245ff) to cost recovery (CGS 16-245gg)
  - Energy Storage Solutions
  - Residential Renewable Energy Solutions – “affordable housing”
  - Environmental Infrastructure scope expansion (e.g., Smart-E, C-PACE)
- **Inflation Reduction Act**
  - Implementing “Dream Bigger” strategy to realize greater investment tax credits with focus on vulnerable communities
  - DOE LPO – State Energy Financing Institutions
  - EPA – Greenhouse Gas Reduction Fund
- **Governance**
  - New member integration (i.e., Deputy Commissioners Hotaling and Webster) with loss of Hoydick, Chandy, and Hackett

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Connecticut Green Bank #1 Federal Priority
Greenhouse Gas Reduction Fund

- **Inflation Reduction Act** – provides $27 billion to the U.S. Environmental Protection Agency (EPA) to administer the Greenhouse Gas Reduction Fund (GGRF)
- **Implementation Framework** – EPA recently released a three-part implementation framework for the GGRF, including:
  - **National Clean Investment Fund** (NCIF) – $14 billion competition that will fund 2-3 national nonprofits that will partner with private capital providers to deliver financing at scale to businesses, communities, community lenders, and others
  - **Clean Communities Investment Accelerator** (CCIA) – $6 billion competition that will fund 2-7 hub nonprofits with the plans and capabilities to rapidly build the clean financing capacity of specific networks of public, quasi-public, and nonprofit community lenders to ensure that households, small businesses, schools, and community institutions in low-income and disadvantaged communities have access to financing
  - **Solar for All** - $7 billion competition that will provide up to 60 grants to states, tribes, municipalities and nonprofits to expand the number of low-income and disadvantaged communities for investment in residential and community solar

Greenhouse Gas Reduction Fund
Recent Filings

CONNECTICUT GREEN BANK

May 12, 2023

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004
ggrf@epa.gov

SUBJECT: Public Comments from the Connecticut Green Bank – Written Comment: Greenhouse Gas Reduction Fund Implementation Framework Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

The Connecticut Green Bank ("Green Bank") values the U.S. Environmental Protection Agency's ("EPA") invitation to provide comments regarding the Implementation Framework ("Framework") for the Greenhouse Gas Reduction Fund ("GGRF"). The Framework invites written technical feedback and comments on the design and implementation of the GGRF.

As the nation's first state-level green bank, the Green Bank leverages the limited public resources it receives to attract multiples of private investment to scale up clean energy deployment. Since its inception, the Green Bank has mobilized $2.26 billion of investment into Connecticut's clean energy economy at a 7 to 1 leverage ratio of private to public funds. The Green Bank has supported the creation of 27,720 direct, indirect and induced jobs, reduced the energy burden on over 66,500 families and businesses, deployed nearly 510 MW of clean renewable energy, helped avoid 10.4 million tons of CO2 emissions over the life of the projects, and generated $113.6 million in individual income, corporate, and sales tax revenues to the State of Connecticut.

For a more complete overview of the green bank model and the impact of the Green Bank – see Attachments A and B.

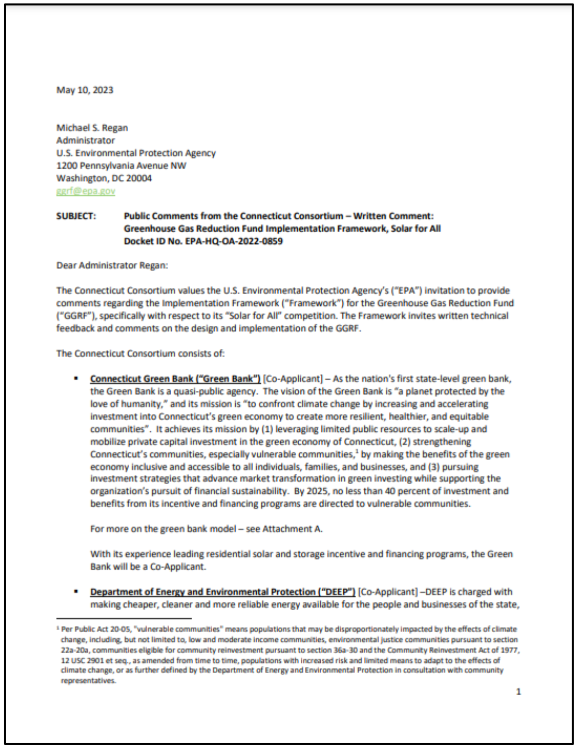
As a tool to support the increased and accelerated development of the state's green economy, the Green Bank's efforts assist the implementation of public policy for the State of Connecticut, including:

- **Reducing Greenhouse Gas Emissions** – no less than 45 percent reduction from 2001 levels by 2030,[1] 100% decarbonized electric sector by 2040, and no less than 80% reduction from 2001 levels by 2050;

[1] Consistent with the Nationally Determined Contribution of 50-52 percent reduction of 2005 levels by 2030

1

Implementation Framework
NCIF and CCIA
Connecticut Green Bank



May 10, 2023

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004
ggrf@epa.gov

SUBJECT: Public Comments from the Connecticut Consortium – Written Comment: Greenhouse Gas Reduction Fund Implementation Framework, Solar for All Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

The Connecticut Consortium values the U.S. Environmental Protection Agency's ("EPA") invitation to provide comments regarding the Implementation Framework ("Framework") for the Greenhouse Gas Reduction Fund ("GGRF"), specifically with respect to its "Solar for All" competition. The Framework invites written technical feedback and comments on the design and implementation of the GGRF.

The Connecticut Consortium consists of:

- **Connecticut Green Bank ("Green Bank")** [Co-Applicant] – As the nation's first state-level green bank, the Green Bank is a quasi-public agency. The vision of the Green Bank is "a planet protected by the love of humanity," and its mission is "to confront climate change by increasing and accelerating investment into Connecticut's green economy to create more resilient, healthier, and equitable communities". It achieves its mission by (1) leveraging limited public resources to scale-up and mobilize private capital investment in the green economy of Connecticut, (2) strengthening Connecticut's communities, especially vulnerable communities,[1] by making the benefits of the green economy inclusive and accessible to all individuals, families, and businesses, and (3) pursuing investment strategies that advance market transformation in green investing while supporting the organization's pursuit of financial sustainability. By 2025, no less than 40 percent of investment and benefits from its incentive and financing programs are directed to vulnerable communities.

  For more on the green bank model – see Attachment A.

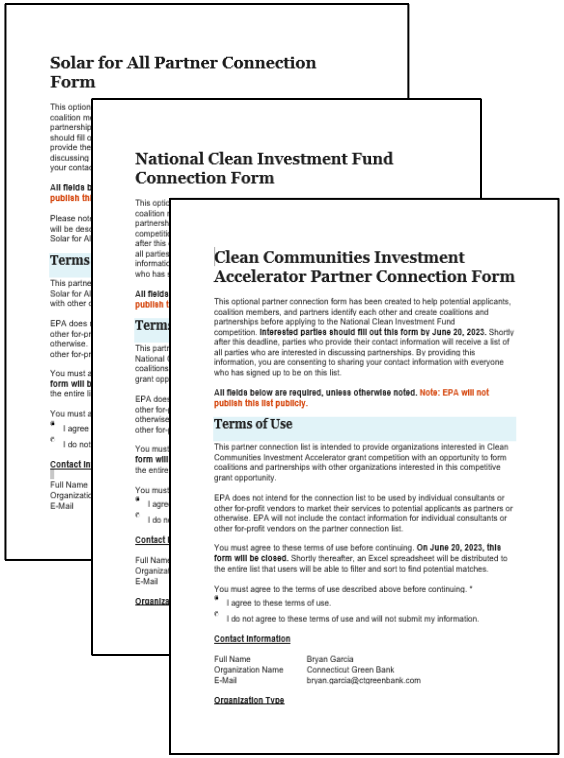
  With its experience leading residential solar and storage incentive and financing programs, the Green Bank will be a Co-Applicant.

- **Department of Energy and Environmental Protection ("DEEP")** [Co-Applicant] –DEEP is charged with making cheaper, cleaner and more reliable energy available for the people and businesses of the state,

[1] Per Public Act 20-05, "vulnerable communities" means populations that may be disproportionately impacted by the effects of climate change, including, but not limited to, low and moderate income communities, environmental justice communities pursuant to section 22a-20a, communities eligible for community reinvestment pursuant to section 36a-30 and the Community Reinvestment Act of 1977, 12 USC 2901 et seq., as amended from time to time, populations with increased risk and limited means to adapt to the effects of climate change, or as further defined by the Department of Energy and Environmental Protection in consultation with community representatives.

1

Implementation Framework
Solar for All
Connecticut Consortium



Solar for All Partner Connection Form

National Clean Investment Fund Connection Form

Clean Communities Investment Accelerator Partner Connection Form

This optional partner connection form has been created to help potential applicants, coalition members, and partners identify each other and create coalitions and partnerships before applying to the National Clean Investment Fund competition. **Interested parties should fill out this form by June 20, 2023.** Shortly after this deadline, parties who provide their contact information will receive a list of all parties who are interested in discussing partnerships. By providing this information, you are consenting to sharing your contact information with everyone who has signed up to be on this list.

All fields below are required, unless otherwise noted. Note: EPA will not publish this list publicly.

Terms of Use

This partner connection list is intended to provide organizations interested in Clean Communities Investment Accelerator grant competition with an opportunity to form coalitions and partnerships with other organizations interested in this competitive grant opportunity.

EPA does not intend for the connection list to be used by individual consultants or other for-profit vendors to market their services to potential applicants as partners or otherwise. EPA will not include the contact information for individual consultants or other for-profit vendors on the partner connection list.

You must agree to these terms of use before continuing. **On June 20, 2023, this form will be closed.** Shortly thereafter, an Excel spreadsheet will be distributed to the entire list that users will be able to filter and sort to find potential matches.

You must agree to the terms of use described above before continuing. *

- I agree to these terms of use.
- I do not agree to these terms of use and will not submit my information.

Contact Information

Full Name	Bryan Garcia
Organization Name	Connecticut Green Bank
E-Mail	bryan.garcia@ctgreenbank.com

Organization Type

Connection Forms
Solar for All, NCIF, CCIA
CTGB, Connecticut Consortium

For all information, please visit www.ctgreenbank.com/ggrf

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Agenda Item #5b

C&LM Plan and Green Bank Comprehensive Plan

CY24 C&LM Plan

2022-2024 Plan Updates

- **Filed 2023 Plan Update and 2023 Program Savings Document manual on November 1, 2022**
  - Awaiting draft conditions from DEEP
- **Annual Planning Meeting on June 28, 2023**
- **Beginning 2024 Plan Update Process for filing by November 1, 2023**

Timeline for 2024 Plan Update

June

- Develop timeline
- Develop Plan Update text outline, draft Budget tables and 2024 PSD
- June 28 EEB Annual meeting
- Jun 30: Deadline for evaluation inclusion in 2024 PSD

July

- Finalize outline
- Develop initial drafts of Plan Update text, Budget/Savings tables and 2024 PSD
- Integrate edits and feedback from EEB consultants and Companies

August

- Develop draft Plan Update text, Budget/ Savings tables and 2024 PSD
- Aug. 2: distribute draft Budget/Savings tables to EEB
- Aug. 9 EEB Meeting
- Integrate edits and feedback from EEB consultants and Companies

September

- Sep. 6: distribute draft Plan Update text, Budget/ Savings tables, and 2024 PSD to EEB
- Sep.13 EEB Mtg
- Sep.13: EEB votes on Budget/Savings tables
- Integrate edits and feedback from EEB consultants and Companies

October / November

- Oct. 4: Final documents to EEB
- Oct.11: EEB Meeting
- Oct.11: EEB votes on Plan Update text and 2024 PSD
- Prep documents for filing once approved
- Nov.1: File 2024 Plan Update and 2024 PSD

Empowering you to make smart energy choices

Agenda Item #6ai

Opportunities and Challenges

Healthy Housing

LIHEAP

"Healthy Housing"
Overview of September and December of 2022

- **State Incentive Overview** – reviewed incentive programs through C&LM Programs (i.e., HES-IE including Services and Rebates and Incentives, Residential Heat Pump Incentives), EDCs (i.e., Residential Renewable Energy Solutions, Shared Clean Energy Facilities), and Green Bank (i.e., Energy Storage Solutions)

- **Federal Incentive Overview** – reviewed Inflation Reduction Act incentives (i.e., EE (e.g., 25C) and RE (e.g., 25D) tax credits, and rebates (i.e., HOMES, High EE Home Rebate Program)) and adders (i.e., domestic content, energy communities, low-income, labor)

- **Navigate Incentive Maze** – harness all the tax credits, rebates and incentive programs, and utilize financing products to design holistic approaches to help customers navigate the incentive maze – with a focus on "affordable housing"

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"Healthy Housing"
Ongoing Discussion

1. **<u>Housing Priority</u>** – how much does the Joint Committee want to focus on housing (i.e., residential market segment) as a priority?
2. **<u>Healthy Housing</u>** – how should we think about a definition for healthy housing (i.e., energy and beyond energy)?
3. **<u>Community Resilience</u>** – when housing is lost as a result of a climate change related event, how should we think about community resilience (e.g., resilience hubs)?
4. **<u>LIHEAP</u>** – beyond heating, how can LIHEAP funds be used (e.g., cooling, HES-IE)?

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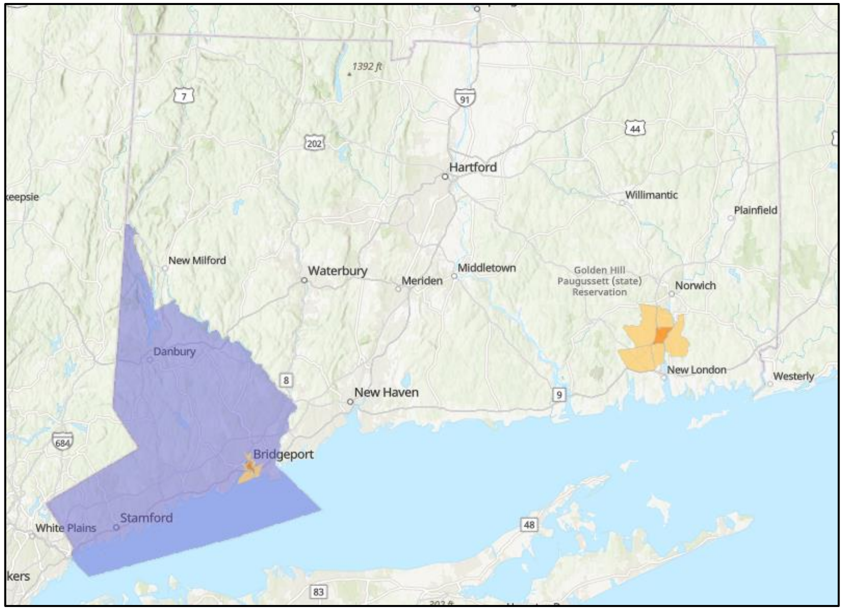
Agenda Item #6aii

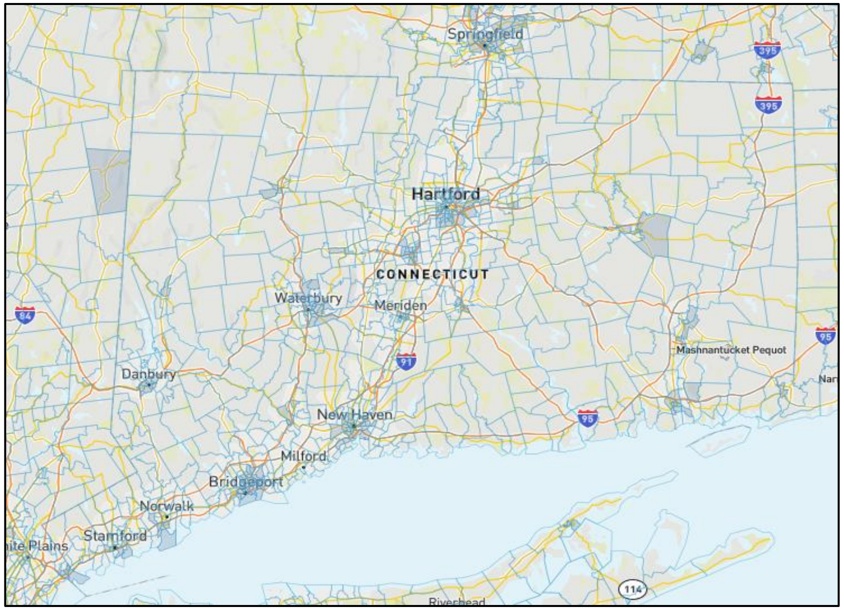
Opportunities and Challenges

Healthy Housing

Inflation Reduction Act

Inflation Reduction Act
Section 48 Investment Tax Credit Adders





Energy Communities

10% Adder

MSA, Retired Coal Fired Power Plant, and Brownfields

Low-Income Communities

10-20% Adder

1.8 GW per year

wind and solar (+ storage)

Ownership and Location are Priority

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REFERENCES

https://arcgis.netl.doe.gov/portal/apps/experiencebuilder/experience/?id=a2ce47d4721a477a8701bd0e08495e1d

https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5

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Agenda Item #7ai

Other Business

Research and Development

Clean Energy Jobs Study

Connecticut Clean Energy Industry Report
Completed 2022 Report

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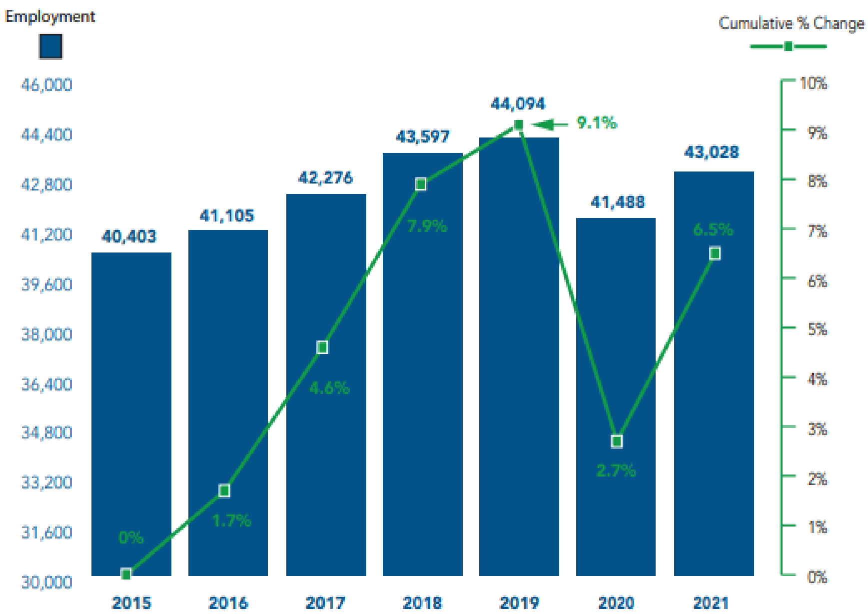
Connecticut Clean Energy Industry Report
2022 Report Findings



Workforce Demographic	Connecticut Clean Energy, 2020	Connecticut Clean Energy, 2021	Connecticut Overall, 2021	US Clean Energy, 2021	US Overall, 2021
Male	72.3%	72.6%	48.9%	72.5%	53.0%
Female	27.7%	27.4%	51.1%	27.5%	47.0%
Hispanic or Latino	11.1%	12.1%	14.5%	16.6%	18.0%
Not Hispanic or Latino	88.9%	87.9%	85.5%	83.4%	82.0%
American Indian or Alaska Native	<1%	<1%	<1%	1.4%	1.0%
Asian	6.3%	6.4%	5.3%	8.1%	6.6%
Black or African American	6.3%	6.8%	13.1%	8.4%	12.3%
Native Hawaiian or other Pacific Islander	<1%	<1%	<1%	1.0%	<1%
White	80.8%	79.7%	79.0%	73.3%	77.5%
Two or more races	5.1%	5.5%	1.9%	7.7%	1.9%
Veterans	9.9%	9.3%	4.4%	9.0%	5.6%
55 and over	14.1%	13.5%	27.6%	13.5%	23.6%

Connecticut rebounding from COVID impacts in 2020,
while slowly increasing Black and Brown people in the workforce

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Connecticut Clean Energy Industry
From Looking Back to Planning Ahead

- **Interest Raised** – Melissa Kop (EEB) and Adrienne Farrar Houël (CTGB) seeking information that is future oriented instead of looking back

- **Sought Information** – provided an example proposal by bW Research Partnerships to conduct a "[State] Clean Energy Workforce Needs Assessment" to inform investments in clean energy workforce programming, including needs of employers to meet state's 2030 GHG reduction targets – recommend combination of Tasks 2, 4, and 5:

  - **Task 1** – Kick-Off Meeting and Project Mgt.
  - **Task 2** – Assessment of Current Workforce
    A. Current Workforce Analysis
    B. Occupation Level Data Assessment
    C. Employer Workforce Needs Assessment
    D. Current Employee Workforce Needs Assessment
    E. Training Gap Analysis and Inventory
    F. Workforce Development Entities Inventory
  - **Task 3** – Two-Month Process Check-In
  - **Task 4** – Future Projected Workforce Analysis and Workforce Development Needs Assessment
  - **Task 5** – Assessment of Workforce Development Best Practice Examples
    A. Assessment of Workforce Development Best Practice – EJ Populations and Women and Minority Owned Businesses
    B. Current and Projected Fossil Fuel Worker Analysis
    C. Gap Analysis, Stakeholder Strategy Sessions
    D. Workforce Awareness and Promotion Assessment
  - **Task 6** – Presentation of Research and Final Cumulative Report Delivery

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Agenda Item #7aii

Other Business

Research and Development

Heat Pump – Market Assessment

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Agenda Item #7b

Other Business

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Agenda Item #8

Public Comments

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Agenda Item #9

Adjourn

Draft MINUTES

Joint Committee of the CT Energy Efficiency Board and the Connecticut Green Bank Board of Directors

Wednesday, December 21, 2022
1:30 - 3:00 p.m.

Due to COVID-19, all participants joined via the conference call.

In Attendance

Voting Members: John Harrity, Melissa Kops, Lonnie Reed, Brenda Watson, Claire Sickinger, Victoria Hackett (DEEP)

Non-Voting Members: Stephen Bruno, Brian Farnen, Bryan Garcia

Members Absent: John Viglione

Others: Mackey Dykes, Richard Faesy, Cheryl Lumpkin, Shubhada Kambli, Ralph Mesite, Madeline Priest, Larry Rush, Ariel Schneider, Stacy Sherwood

Unnamed Callers: 01

1. Call to Order

   - Brenda Watson called the meeting to order at 1:34 pm.

2. Public Comments

   - None

Brenda Watson introduced Melissa Kops as a new member of the Joint Committee.

3. Review and approval of Meeting Minutes from the September 21, 2022 meeting.

Resolution #1

Motion to approve the meeting minutes of the Joint Committee for September 21, 2022.

Upon a motion made by Victoria Hackett and seconded by John Harrity, the Joint Committee voted to approve Resolution 1. None opposed or abstained. Motion approved unanimously.

4. Joint Committee – Regular Meeting Schedule for 2023

- Bryan Garcia reviewed the schedule which is March 22, June 21, September 27, and December 20 for 2023.

Resolution #2

Motion to approve the regular meeting schedule of the Joint Committee for 2023.

Upon a motion made by John Harrity and seconded by Brenda Watson, the Joint Committee voted to approve Resolution 2. None opposed or abstained. Motion approved.

5. Clean Energy Jobs Report 2022 – Update

- Bryan Garcia gave an update to the report for 2022 which has a timeline to be deliverable in 1-2 months for the 2021 data, with an additional 1-2 months required to include data from 2022 once the USEER data is available.
    - John Harrity asked if press will be notified once the report is released and Bryan Garcia stated a press release and webinar is typically held.
    - Brenda Watson asked if the report can be used as a means to present at the upcoming CT Energy Conference and Expo in October. Bryan Garcia agreed and offered some panel ideas.
    - Melissa Kops asked if there are any reports that are future-oriented since this report looks back. Victoria Hackett responded that coordination on the narrative for the report would help and that DEEP can assist in making sure all opportunities available are being leveraged to benefit Connecticut. Bryan Garcia stated that OWS may be able to look at the last 2 years of reports and reflect back on how its tone could change, given their perspective, and apply those changes to the 2023 report.
    - Melissa Kops asked if there are any equity metrics involved in this report and Brenda Watson responded that yes, especially in reflection of previous reports. Victoria Hackett suggested highlighting the program that has been running to increase equitable workforce development.

6. Plan Coordination
    a. Input to FY 2023 Connecticut Green Bank Comprehensive Plan (Revisions)

- Bryan Garcia updated the progress to the Green Bank Comprehensive Plan. The Green Bank continues its transition in several ways including for Energy Storage Solutions, Residential Renewable Energy Solutions (i.e., affordable housing), Environmental Infrastructure, and more. He summarized the creation of the Environmental Infrastructure Fund which separates out funds for it from what is meant to be used for clean energy and from the Regional Greenhouse Gas Initiative proceeds. He then discussed the $27 billion Greenhouse Gas Reduction Fund which was created within the Inflation Reduction Act and then the recent Public Comment and Engagement period for the EPA.
    - Brenda Watson asked if the timing for the funding distribution is known. Bryan Garcia responded that the language within the IRA speaks to the EPA releasing funding 180 days after the signing of the Act, so the anticipation is mid to late February 2023 for solicitations, but the exact timing is not currently known.

Victoria Hackett added DEEP also added comments in coordination with the Green Bank and highlighted some of the points mentioned.

- John Harrity asked if the State passed enabling legislation to broaden the Green Bank's mandate to encompass the new areas of concentration but didn't allocate any funds for it. Bryan Garcia responded that yes, that is correct, but at the time the Green Bank was pushing for the expansion to be passed at the federal level for funds to come to Connecticut. He elaborated more on the funding sources currently available and future opportunities, including potential contracts that will become available in 2024 through the Greenhouse Gas Reduction Fund.
- Melissa Kops asked who is eligible to apply to the Green House Gas Reduction Fund. Bryan Garcia answered that the Zero Emissions Technologies part of the bill focuses on Low Income and Disadvantaged Communities focuses on states, municipalities, tribes, and other eligible entities which is complicated as it is a specific definition but broadly includes non-profits. Most of the debate is focused on the National Climate Band Provisions because of views if recipients should be a single or multiple climate banks and financial institutions.

b. 2022-2024 Conservation and Load Management Plan

- Stephen Bruno gave an update to the 2022-2024 Plan. DEEP provided Conditions of Approval in response to what was filed on November 1, 2022. He reviewed the responses to the Conditions of Approval then summarized the 2023 Decarbonization efforts including the inclusion of new technologies to the Capital 4 Change savings calculator to promote those technologies. He reviewed the 2023 Approved Prescriptive Retrofit Incentives and 2023 2023 Approved New Construction Incentives. In terms of 2022 reports, the 2022 Annual Legislative Report is being drafted with a planned filing by March 1, 2023 and work is being done with the Green Bank for the 2022 CT Clean Industry Energy Report.
  - Brenda Watson asked if moving forward, more definition could be included for "per ton" for everyday users. Stephen Bruno agreed.

7. Opportunities and Challenges
   a. Healthy Housing

- Bryan Garcia summarized the Healthy Housing opportunity history including overviews at the State and Federal levels for incentives. He discussed the efforts being made to help customers navigate the "incentive maze" to realize as many opportunities as possible for Connecticut to receive funding and reach deployment targets. He presented Affordable Housing as a use case, addressing key points such as state and federal properties, energy efficiency, renewable incentives, storage, EV recharging, and financing products.
  - Brenda Watson asked if in addition to the State Incentives for storage, are customers eligible for an additional 50% tax credit. Bryan Garcia answered that yes, typically State incentives are applied first then whatever is remaining is applied to the Federal tax credit at the 50% rate (i.e., tax credit plus adders – low income, energy communities). However, each of the use cases will require more research to determine the most economic proposition. He stated he believes nearly all clean energy projects will have positive economic conditions, but the challenge is to make the process easy for consumers to act and take advantage of those options. Victoria Hackett added that navigating the maze will be difficult

but there is also a need to understand how to best leverage the existing programs to unlock the federal funding and possibly redirect some program money to best distribute it to benefit all programs. She stated DEEP is also internally developing lists of all programs available to LMI customers to reduce concerns about shifting energy systems to maximize benefits, as that can change what becomes available to them, and that there is a need to take a wholistic approach.

- Richard Faesy commented there is a need to make a communication path to be able to present a "One Stop Shop" to customers, developers, and contractors. He asked is there is an opportunity here to develop a web platform to do so. Victoria Hackett responded there is the Energize CT platform which does include information beyond what the EEB and CL&M funds, so leveraging that existing platform makes sense. Other tools may be needed for contractors to determine eligibility for customers at a glance which could be added. Brenda Watson noted the difficulty to understand things as an everyday consumer and so there is a plan for a webinar series for providers. She noted an example from Michigan for those seeking LIHEAP assistance to then apply for other forms of assistance.
- Melissa Kops noted some municipalities that are not officially "distressed" but have high populations below the poverty level, such as New Haven, may not be eligible for benefits and may need closer examination. Victoria Hackett agreed to flag that topic to advocate for. Bryan Garcia commented some clarification of the PURA ruling may be needed then expanded on a part of it that may make them eligible because of previous participation in affordable housing programs. There is some flexibility beyond census tracks.
- John Harrity asked if any of the federal funds can be used to develop an ad campaign or communications program about everything. Victoria Hackett responded that it may be possible as guidance is released and may be an opportunity to redirect some State funding once Federal funds are received.

8. Plans for the 2023 Legislative Session

- Melissa Kops discussed some priorities and plans for the upcoming legislative session for the Green Building Council. There are many organizations looking for energy transparency and move away from energy labelling to transparency for consumers and their protections. She noted the CT Green Building Council's other priorities in addition to energy transparency are an energy stretch code, buy clean low carbon state procurement, CT high performance building standards, and additional funding to HES-IE (potentially directed toward neighborhood-scale EJ interventions).
- John Harrity commented that the roundtable on Climate and Jobs is looking to introduce legislation to extend the carbon-neutral healthy air renewable energy schools in Bridgeport to become statewide.
- Victoria Hackett noted that proposals will be needed to determine how to best administer the funds from a federal energy efficiency revolving loan fund.
- John Harrity highlighted that utility rates in Connecticut will be nearly doubled soon for many residents and wanted to make sure it is addressed in future discussions. Victoria Hackett responded the increase is due to an increase in the standard service generation rate and those that are not hardship customers have the option to switch to an electric supplier, which should offer a lower rate, and that the generation rate increases every 6 months though switching providers is always possible. This increase is partly due to Connecticut's reliance on natural gas and the war in the Ukraine and that the standard service generation rate is directly affected by world events outside of the utility

companies' control. She recognized that it does create an affordability crisis and that work is being done to address it through organizations like Operation Fuel to increase funding to help customers. Brenda Watson noted work is being done with Operation Fuel and DEEP to get assistance to customers who would not normally qualify for support. Brian Farnen added in to be skeptical of third-party suppliers due to potential customer service issues and to be thorough with research before making a decision.

9. Other Business
    a. C&I – Government

- Mackey Dykes gave a brief update to the municipal and state government projects, including the resolution of a legal issue with a financing offer through the SBEA program, increased Municipal Loan terms, and that companies now have the ability to qualify Municipal Loans at an increased amount. Stephen Bruno added it is on the State to agree with the loan documents but the Green Bank has made the infrastructure to do so easy.

    b. C&I – Small & Medium/Large Businesses

- Stephen Bruno gave an update to the integration of electric vehicle chargers into SBEA and Municipal loan offerings. Companies coordinating with SBEA vendors to train them on financing terms to promote more comprehensive projects and streamlining some of the financing procedures.

    c. Residential – Single & Multi-Family Homes

- Ralph Mesite summarized the newest Smart-E Summer Special Offer. It resulted in 225 projects for a total of over $5.1 million financed with a total IRB spent of $586,572.
    - Brenda Watson asked if the rates would stay the same in 2023 and Ralph Mesite responded no, the offer expired on October 31, 2022 and will go back to the standard rate of 4.49% to 6.29% depending on the term length.
- Ralph Mesite summarized the review of heat pump projects deployed since the program's inception, the total financing of heat pump projects over time, geothermal installations financed by Smart-E by location in Connecticut, and the top 25 towns with heat pump installations. He also reviewed the installations of fossil fuel HVAC vs heat pump HVAC systems since 2013 which shows that heat pump installations have been increasing over time.
    - John Harrity asked if there is an average cost for residential heat pump installation. Ralph Mesite responded that much is dependent on house layout and size but for an approximately 2000-2500 sq ft house, it could cost $20,000 to $25,000 for a full conversion to a ductless mini-split system, but many factors will determine the estimate as contractors will want to properly analyze each house for what is required.
    - Melissa Kops asked if the Green Bank has an offer to move away from fossil fuels through financing offers. Bryan Garcia responded that the special offer is being consistently applied to the decarbonization wedges that the State has and is very climate-change focused (e.g., air source heat pumps, EV rechargers, battery storage).

    d. Shared Clean Energy Facilities – Potential Opportunity for Additional Energy Efficiency

- Bryan Garcia summarized the Shared Clean Energy Facilities proposal updates from the last few months including the 75MW of projects procured and the PURA Final Decision which was issued on December 7, 2022. He then reviewed the Green Bank's proposal and redline edits submitted. The next SCEF annual review is in August 2023. Victoria Hackett added there is so many opportunities to coordinate on funding sources and agreed with Bryan Garcia about where to drive focus. Brenda Watson acknowledged this point, but also wanted to see continued progress on the SCEF concept proposed by the Green Bank.

e. Other Business

- None

10. Public Comments

- None.

11. Adjourn

Brenda Watson adjourned the Joint Committee Meeting at 3:08 pm.

Respectfully submitted,

____
Brenda Watson, Chairperson

May 10, 2023

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004
ggrf@epa.gov

SUBJECT: Public Comments from the Connecticut Consortium – Written Comment: Greenhouse Gas Reduction Fund Implementation Framework, Solar for All Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

The Connecticut Consortium values the U.S. Environmental Protection Agency's ("EPA") invitation to provide comments regarding the Implementation Framework ("Framework") for the Greenhouse Gas Reduction Fund ("GGRF"), specifically with respect to its "Solar for All" competition. The Framework invites written technical feedback and comments on the design and implementation of the GGRF.

The Connecticut Consortium consists of:

- **Connecticut Green Bank ("Green Bank")** [Co-Applicant] – As the nation's first state-level green bank, the Green Bank is a quasi-public agency. The vision of the Green Bank is "a planet protected by the love of humanity," and its mission is "to confront climate change by increasing and accelerating investment into Connecticut's green economy to create more resilient, healthier, and equitable communities". It achieves its mission by (1) leveraging limited public resources to scale-up and mobilize private capital investment in the green economy of Connecticut, (2) strengthening Connecticut's communities, especially vulnerable communities,[1] by making the benefits of the green economy inclusive and accessible to all individuals, families, and businesses, and (3) pursuing investment strategies that advance market transformation in green investing while supporting the organization's pursuit of financial sustainability. By 2025, no less than 40 percent of investment and benefits from its incentive and financing programs are directed to vulnerable communities.

  For more on the green bank model – see Attachment A.

  With its experience leading residential solar and storage incentive and financing programs, the Green Bank will be a Co-Applicant.

- **Department of Energy and Environmental Protection ("DEEP")** [Co-Applicant] –DEEP is charged with making cheaper, cleaner and more reliable energy available for the people and businesses of the state,

[1] Per Public Act 20-05, "vulnerable communities" means populations that may be disproportionately impacted by the effects of climate change, including, but not limited to, low and moderate income communities, environmental justice communities pursuant to section 22a-20a, communities eligible for community reinvestment pursuant to section 36a-30 and the Community Reinvestment Act of 1977, 12 USC 2901 et seq., as amended from time to time, populations with increased risk and limited means to adapt to the effects of climate change, or as further defined by the Department of Energy and Environmental Protection in consultation with community representatives.

in addition to conserving, improving, and protecting the state's natural resources and environment. The agency is committed to playing a positive role in building Connecticut's economy and creating jobs, all with the incentive of fostering a sustainable and prosperous economic future for the state. Since the agency's inception, DEEP has made great environmental strides including, but not limited to, cleaning up the land and waters of Long Island Sound, improving air quality, beautifying Connecticut's landscape, protecting natural resources, expanding the network of state parks and forests, and restoring terrestrial wildlife and aquatic life in the state's waterways. Work at DEEP has also helped support Connecticut's achievement of over 75% of our state-wide electric load being firmly contracted with zero-emission technologies.

With its leadership in overseeing climate change and clean energy policy, DEEP will be a Co-Applicant.

- **<u>Public Utilities Regulatory Authority ("PURA")</u>** [Co-Applicant] – PURA is Connecticut's regulatory agency that oversees the rates and services of electricity, natural gas, water and telecommunications companies, and manages franchises for the state's cable television companies. PURA is statutorily-charged with ensuring that Connecticut's investor-owned utilities, including the state's electric, natural gas, water, and telecommunications companies, provide safe, clean, reliable, and affordable utility service and infrastructure. A quasi-judicial agency that interprets and applies the statutes and regulations governing all aspects of Connecticut's utility sector, PURA's role encompasses many responsibilities. This includes setting the rates charged by investor-owned utilities, advancing modernization of the electric distribution system, regulating the retail electric supplier market, implementing federal requirements for natural gas pipeline safety, fostering adequate water system infrastructure investments, providing education and outreach for consumers, and regulating the expansion of telecommunications infrastructure.

  With its leadership overseeing the implementation of residential solar, community solar, and battery storage incentive programs and policy, PURA will be a Co-Applicant.

- **<u>Connecticut Housing and Finance Authority ("CHFA")</u>** – Another essential quasi-public agency, CHFA's mission is to alleviate the shortage of housing for low- to moderate-income families and persons in this state and, when appropriate, to promote or maintain the economic development of this state through employer-assisted housing efforts. All 169 Connecticut towns have benefited from financing by the self-funded agency which lends more than $500 million dollars each year for affordable housing. CHFA leverages its financial strength in partnership with public and private investors resulting in nearly 147,000 Connecticut residents having purchased their first homes with a CHFA below-market interest rate mortgage thus far. Not only has it afforded Connecticut residents the ability to begin building their financial futures, CHFA's investments have built or renovated the more than 58,000 affordable multifamily apartments that hundreds of thousands of state residents call home.

  As a quasi-public organization focused on housing and finance, CHFA is an instrumental part of the interagency team working on residential solar and storage investment and deployment on affordable housing.

- **<u>Department of Banking ("DOB")</u>** – DOB regulates the financial services industry in Connecticut. The agency is the primary state regulator for securities, consumer credit and state-chartered banks and credit unions. The DOB's mission is rooted in advocacy for consumer and investors and they are responsible for financial implementations including, but not limited to, licensing and regulation of individuals and businesses that fall under their jurisdiction. The agency's necessary enforcement actions can result in administrative orders and settlement agreements pertinent to the ongoing development and security of Connecticut's finances.

With its leadership regulating the banking industry, DOB will use its authority that federal law provides (e.g., Community Reinvestment Act) to encourage regulated financial institutions to support and expand lending efforts to low-income and disadvantaged communities so that they may have the necessary capital to benefit from solar and storage.

- **Department of Housing ("DOH")** – DOH works together with municipal leaders, public agencies, community groups, local housing authorities, and other housing developers in the planning and development of affordable homeownership and rental housing units, the preservation of existing multi-family housing developments, community revitalization, and financial and other support for Connecticut's most vulnerable residents through their specialized funding and technical support programs. DOH annually invests $200M in bonds to produce and preserve affordable housing. As the State's lead agency for all matters relating to housing, DOH provides leadership for all aspects of policy and planning relating to the development, redevelopment, preservation, maintenance and improvement of housing serving low- and moderate-income individuals and families. DOH is also responsible for overseeing compliance with applicable statutes, regulations, and financial assistance agreements for funded activities through long-term program compliance monitoring. Their mission is to eliminate homelessness and to catalyze the creation and preservation of quality, affordable housing to meet the needs of all individuals and families statewide to ensure that Connecticut continues to be a great place to live and work.

  With its leadership overseeing housing policy, DOH is an instrumental part of the interagency team working on residential solar and storage investment and deployment on affordable housing.

The State of Connecticut has taken several leading public policy positions in the green economy transition, including:

- **Reducing Greenhouse Gas Emissions** – targeting no less than a 45 percent reduction from 2001 levels by 2030,[2] 100% decarbonization of the electric sector by 2040, and no less than an 80% reduction from 2001 levels by 2050[3];

- **Justice 40** – within various incentive programs,[4] establishing residential solar and battery storage targets of no less than 40 percent of investment and benefits directed towards low-income families, distressed communities, and vulnerable communities; and

- **Just Transition** – enabling workforce development programs, including pre-apprenticeship and apprenticeship training, paying prevailing wages, and requiring community benefits agreements for certain type of renewable energy project.[5]

These important foundational public policies reduce greenhouse gas emissions while delivering benefits from mobilizing financing and private capital investment in and deployment of such projects in communities, particularly low-income and disadvantaged communities ("LIDACs").

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[2] Consistent with the Nationally Determined Contribution of 50-52 percent reduction of 2005 levels by 2030

[3] In the ongoing 2023 Connecticut General Assembly session, DEEP has submitted legislation that would, among other objectives, increase the state's 2050 target to net-zero and require the agency to establish sub-sector emissions reduction targets.

[4] Residential Renewable Energy Solutions and Energy Storage Solutions

[5] Public Act 21-43 – "An Act Concerning a Just Transition to Climate-Protective Energy Production and Community Investment"

The Connecticut Consortium intends to submit a response to the forthcoming Solar for All Notice of Intent ("NOI"), with the Green Bank, DEEP, and PURA as Co-Applicants. Beyond Solar for All, the Co-Applicants will closely monitor opportunities to engages with the National Clean Investment Fund ("NCIF") and Clean Communities Investment Accelerator ("CCIA") competitions. We encourage the EPA to clearly identify how states can productively engage in the governance of the NCIF and the CCIA in future guidance. The funding for these two competitions will significantly impact states' abilities to cost-effectively decarbonize. Therefore, decisions about which projects and programs are financed/funded over the long-term from these two competitions need to align, and remain aligned, with state policy goals.

For the Solar for All competition, the Connecticut Consortium intends to focus on expanding access to existing low-income solar and storage programs. The experience and expertise of the Connecticut Consortium in administering residential solar, community solar, and battery storage incentive and financing programs, especially for vulnerable communities,[6] will be brought to bear.

1. Residential Solar

Connecticut transitioned its residential solar policies from net metering (i.e., CGS 16-243h) and incentives (i.e., CGS 16-245ff), to a tariff-based compensation structure (i.e., CGS 16-244zz). Administered by the electric distribution companies ("EDCs"), the Residential Renewable Energy Solutions ("RRES") program is the successor program to the Residential Solar Investment Program ("RSIP"), which was administered by the Green Bank from 2012 through 2022. The implementation of the RSIP was among the Northeast region's most effective (e.g., W/capita), efficient (e.g., $/kWh), and equitable (i.e., reaching <80% AMI households and communities of color) residential solar programs.[7]

For more on the RSIP – see Attachment B.

RRES serves to provide two (2) different types of incentives for residential end-use customers, including (a) Buy-All Sell-All Tariff (i.e., $0.3243/kWh), or (b) monthly netting. PURA has established a policy target of no less than 40 percent of the benefits of RRES are directed to low-income families, families residing in distressed communities, or affordable housing.

2. Community Solar

Connecticut has two (2) community solar policies that encourage the investment in and deployment of solar PV, providing opportunities for low-income families as well as tenants within affordable housing to realize benefits from solar energy, including:

- **<u>Residential Renewable Energy Solutions</u>** – an onsite deployment program summarized above, that also serves multifamily affordable housing by requiring participating property owners to share no less than 20% of the economic benefit of a residential solar system from the "Buy-All Sell-All" tariff (i.e., $0.06486/kWh) for 20 years with individually metered tenants of affordable housing;[8] or

[6] Per Public Act 20-05, "vulnerable communities" means populations that may be disproportionately impacted by the effects of climate change, including, but not limited to, low and moderate income communities, environmental justice communities pursuant to section 22a-20a, communities eligible for community reinvestment pursuant to section 36a-30 and the Community Reinvestment Act of 1977, 12 USC 2901 et seq., as amended from time to time, populations with increased risk and limited means to adapt to the effects of climate change, or as further defined by the Department of Energy and Environmental Protection in consultation with community representatives.

[7] "Residential Solar Investment Program: 2012-2022 Program Impact Evaluation and Future Recommendations" by Slipstream (May 3, 2023) – click here

[8] It should be noted that the treatment of master metered multifamily affordable housing properties in terms of RRES is still in process through a regulatory proceeding and expected to be completed by the end of 2023.

- **Shared Clean Energy Facilities** – an offsite deployment program, Shared Clean Energy Facilities ("SCEF") prioritizes low-income families and tenants of affordable housing with a subscriber credit (i.e., $0.0250/kWh) for 20 years should they receive such credit through a random lottery process.

3. Associated Storage

Connecticut recently launched a residential storage incentive program called Energy Storage Solutions ("ESS"), which is being jointly administered by the Green Bank and the EDCs. ESS provides upfront and ongoing performance-based incentives to deploy 290 MW of behind the meter battery storage to (a) reduce peak demand (i.e., passive and active demand response or virtual power plant "VPP") to benefit all ratepayers, and (b) provide resiliency to the participant. PURA has established a policy target of no less than 40 percent of the benefits of ESS are directed to low-income families, families residing in distressed communities, or affordable housing. By combining solar with storage, low-income and disadvantaged communities can reduce energy burden and increase energy security.

4. **Enabling Upgrades**

It is great to see that the EPA has included enabling upgrades that support solar deployment, specifically investments in building infrastructure to support its deployment (e.g., electrical panel upgrades, roof repairs, access to the internet for system monitoring).

5. Other Comments

The Connecticut Consortium has the following comments for the EPA with respect to Solar for All:

- **Expansion of Enabling Upgrades** – beyond enabling upgrades for the "building infrastructure" to support residential solar deployment, there may also be need for "system infrastructure" (e.g., transformer upgrades) or "administrative support" (e.g., interconnection review by EDCs) to increase and accelerate solar + storage deployment, especially in LIDACs. The EPA should also consider allowing "enabling upgrades" to include weatherization, electrification, and energy efficiency, as well as removal of asbestos, lead, and mold,[9] as a component of "building infrastructure" to ensure that all barriers to solar + storage deployment on "system infrastructure" (e.g., overloading distribution system with solar) can be addressed in locations across the country. For example, within the Green Bank's existing "Solar for All" program with PosiGen, energy audits and weatherization are included with solar. By extending the definition of enabling upgrades to include these measures the GHGRF will significantly benefit low-income and disadvantaged communities – enhancing a buildings resilience by enabling efficient heating and cooling system electrification that could continue to operate with solar generation during a grid outage.

- **Equitable Allocation** – as the necessary level of investment in and deployment of residential and community solar in LIDACs is significant (e.g., estimate of $800 million in Connecticut by 2030),[10] in order for states to be able to submit an amount of funding they expect to apply for under the "Solar for All" competition, it will be important for the EPA to clarify what level of allocation states and territories can assume in order for the NOI to appropriately take into consideration the design of a state or territorial program. For planning purpose, the Connecticut Consortium would recommend that an equitable allocation of funds from the EPA to states, territories, and tribes per the recent Bipartisan Infrastructure Law ("BIL") for the Clean Water State Revolving Fund ("CWSRF") be considered as clarification for NOI applicants. For example, the BIL allocated

[9] "Affordable and Accessible Solar for All: Barries, Solutions, and On-Site Adoption Potential" Technical Report NREL/TP-6A20-80532 (September 2021)

[10] Assumes 75 MW of residential solar per year for 8 years (i.e., 600 MW total), with 40 percent of deployment in LIDACs (i.e., 240 MW), and assuming installed cost of residential solar (including for affordable housing) of $3.50/W

Connecticut 1.199% of the CWSRF allocation. If $7 billion were available through Solar for All, then Connecticut would submit a plan through the NOI for a maximum of $83.9 million. If there were no state or territorial equitable allocation, then Connecticut would seek greater funding to achieve the level of investment in and deployment of residential solar in the LIDACs of the state. Regardless of the allocation approach chosen, the EPA should leave flexibility to allow for funding to support existing state solar programs in ways that will reduce cost burdens on ratepayers.

- **Equity and Justice 40** – improving the lives of Americans, particularly those in LIDACs, is the impact the GGRF seeks to achieve. Alongside the EPA, many states, territories, municipalities, and nonprofit organizations share this perspective. The Framework indicates that the pending Notice of Funding Opportunity ("NOFO") will provide additional guidance on the definition of LIDACs located outside of geographies identified by the Climate and Economic Justice Screening Tool ("CEJST"). As recommended by eleven (11) states[11] and a territory[12] in public comments submitted to the EPA on December 5, 2022, to further support equitable funding deployment and to enable leveraging of existing programs and funding streams, the EPA should permit the use of state-specific definitions for "low income," "disadvantaged communities," and other related terms such as "environmental justice zones". The EPA could request NOI applicants to justify their respective state and/or territory definitions.

- **Technical Assistance from the EPA** – as technical assistance resources will be imperative to the success of Solar for All, within the NOFO, the EPA needs to be more specific about what sorts of technical assistance it will provide so that applicants can specify their own technical assistance needs within their NOI. For example, the Environmental Justice Thriving Communities Technical Assistance Centers ("EJ TCTAC") program is an excellent example of community-based technical assistance that the EPA can provide states, Tribal governments, municipalities, and others. Also, if the EPA were to continue its collaboration with the DOE, then tools available from the National Renewable Energy Laboratory ("NREL") like its Distributed Generation Market Demand Model,[13] would be useful technical assistance to provide states, Tribal governments, municipalities, and tribes, especially to assess market potential for solar for single-family owner-occupied and rental low-income, and multifamily rental low-income market segments.

- **Financial Assistance from the EPA and FEMA** – as financial assistance resources will be imperative to the success of Solar for All, especially as it pertains to not only reducing energy burden, but also increasing energy security, in an effort to continue to work across government, the EPA should work with the Federal Emergency Management Agency ("FEMA") to enter into agreements between the GGRF Solar for All program and the Safeguarding Tomorrow through Ongoing Risk Mitigation Act ("STORM Act")[14] with states and Tribal governments to make capitalization grants to establish hazard mitigation revolving loan funds. In an effort to address the short- and long-term solutions to LMI solar adoption barriers, as it applies to resiliency and recovery, increased efforts by stakeholders to ensure federal pre- and post-disaster funding is more readily available and used by low-income and disadvantaged communities is important to realizing all of the benefits from Solar for All and GGRF.[15]

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[11] Connecticut, Colorado, Illinois, Louisiana, Maine, Michigan, Nevada, New Jersey, New Mexico, Pennsylvania, and Vermont
[12] Puerto Rico
[13] https://www.nrel.gov/analysis/dgen/
[14] https://www.congress.gov/bill/116th-congress/senate-bill/3418/all-info
[15] "Affordable and Accessible Solar for All: Barries, Solutions, and On-Site Adoption Potential" Technical Report NREL/TP-6A20-80532 (September 2021)

- **Strategic Coordination** – to the extent that it is possible, there should be strategic coordination from Solar for All with the National Clean Investment Fund ("NCIF") and Clean Communities Investment Accelerator ("CCIA"). For example, recipients of funding for financial assistance and technical assistance through the NCIF and/or CCI should seek to work with standardized loan documents and securitization of assets as appropriate.

- **Webinar Series** – in an effort to share the "lessons learned" and "best practices" developing residential solar in Connecticut, the Green Bank is holding a multipart webinar series. The first webinar was held on May 4, 2023 and focused on "Residential Solar Investment and Deployment in Connecticut: An In-Depth Review of a 10-Year Incentive Program (2012-2022)". For access to the webinar, and a detailed story board – click here.

  There will be several webinars to follow, including:

  - **Webinar Two: Financing Residential Solar in Connecticut #1: Insights into Loan Programs** – will focus on the role of financing, delving deeper into the structure and benefits of two loan products: the CT Solar Loan and the Smart-E Loan. Using $8 million of repurposed American Recovery and Reinvestment Act ("ARRA") funds as credit enhancements, the Green Bank was able to use $25 million in state and federal funds to mobilize $180 million of private capital investment in residential clean energy deployment. In a venture with Sungage Financial, the Green Bank supported a clean energy finance entrepreneur in demonstrating the viability of a specific solar loan product. In collaboration with nine local community banks and credit unions, the Green Bank's Smart-E loan provides a second loan loss reserve for unsecured financing of clean energy projects, including residential solar.

    Monday, June 5, 2023 at 12:00 p.m. EDT

    Register at https://attendee.gotowebinar.com/register/6567252541191848026

  - **Webinar Three: Financing Residential Solar in Connecticut #2: Insights into Lease and Third-Party Ownership Programs** – will focus on two lease products: the CT Solar Lease and Solar for All. Through the leveraging of ARRA funds as credit enhancements, the Connecticut Green Bank provided access to lease financing for local contractors, in partnership with a syndicate of local lenders and tax equity providers. In recognition of the need to provide access to capital to low-income and vulnerable communities, in partnership with PosiGen, the Green Bank launched the Solar for All solar and energy efficiency lease product. This session will look at the structure of these lease financing products, including the various benefits that result from increasing easy and affordable access to residential solar, especially for vulnerable communities.

    Thursday, August 3, 2023 at 12:00 p.m. EDT

    Register at https://attendee.gotowebinar.com/register/2011784552298597467

  It is likely that there will be a fourth webinar series on the new residential solar and storage incentive programs in Connecticut, including a focus on single family homes and affordable housing in LIDACs. The Green Bank looks forward to engaging local and national stakeholders through this webinar series.

The Connecticut Consortium appreciates EPA's efforts to solicit public comment on its Framework for the GGRF.

Sincerely,

Katie Dykes
Katie Dykes
Commissioner
Department of Energy and Environmental Protection

Marissa Gillett
Marissa Gillet
Chair
Public Utilities Regulatory Authority

Seila Mosquera-Bruno
Seila Mosquera-Bruno
Commissioner
Department of Housing

Nandini Natarajan
Nandini Natarajan
Chief Executive Officer
Connecticut Housing and Finance Authority

Jorge Perez
Jorge Perez
Commissioner
Department of Banking

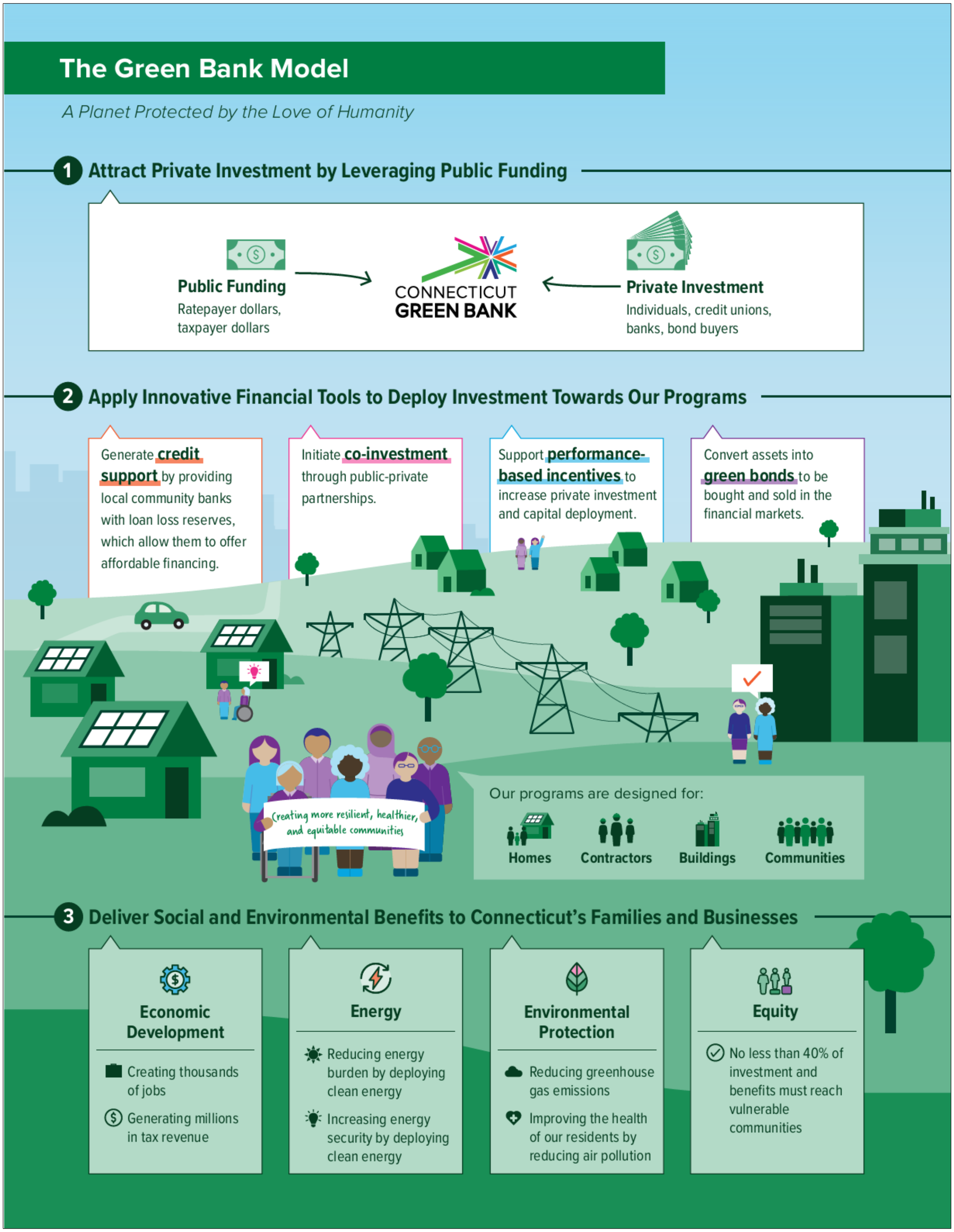
Bryan Garcia
Bryan Garcia
President and CEO
Connecticut Green Bank

cc: Dan DeSimone, Office of Governor Lamont

Attachments
Attachment A – Green Bank Model
Attachment B – Residential Solar Investment Program

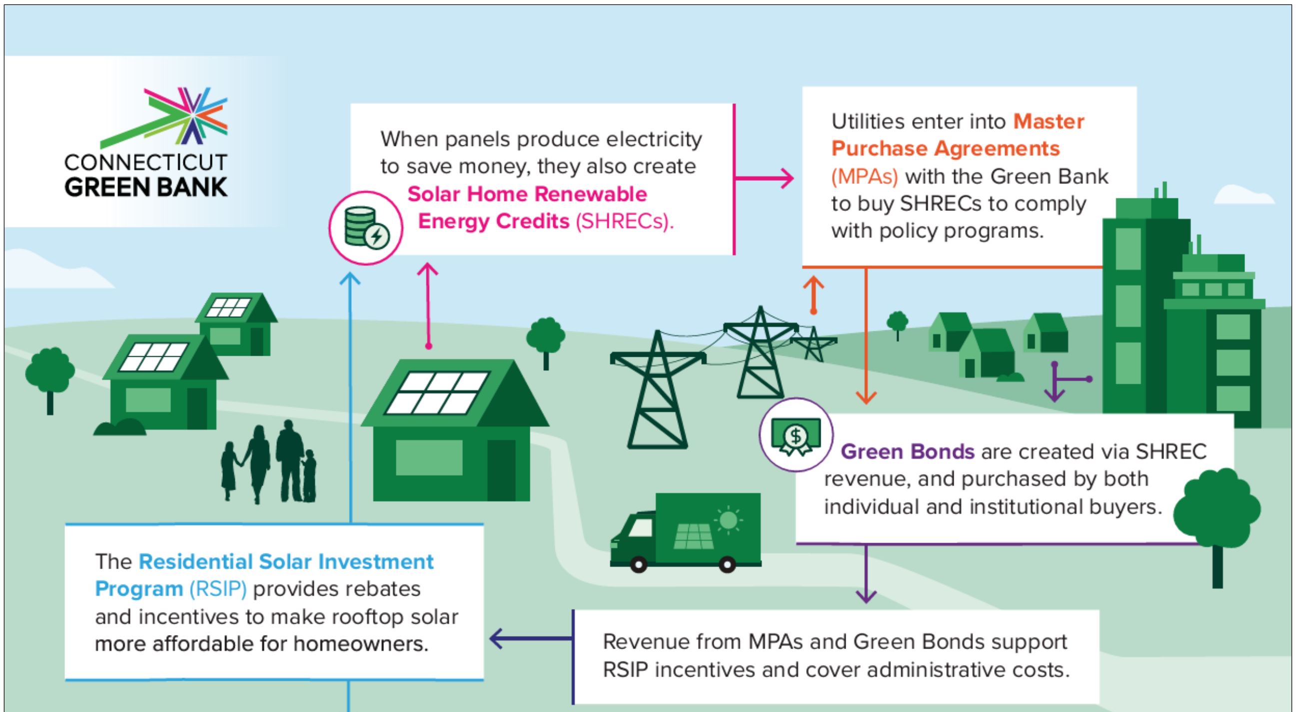
ATTACHMENT A

Green Bank Model



ATTACHMENT B

Residential Solar Investment Program



Residential Solar Investment Program (RSIP)

Through a network of contractors, the Green Bank helped **46,300 households** access solar energy since 2012, surpassing the statutory target of 350 MW one year ahead of the December 2022 deadline.

$1.43 billion Total investment

$156.4 million Total incentive

$0.41/W* Incentive ($33 per Zero Emission Renewable Energy Credit Equivalent)

$3.79/W Installed Cost

Solar Power Generation

378 MW Capacity

10,747,954 MWh Estimated lifetime generation

Solar and Energy Efficiency for All

- **50%** of RSIP projects have been deployed in **vulnerable communities**
- **98%** of RSIP projects had **energy audits** (i.e., Home Energy Solutions)

SHREC Backed Bonds

Consumer demand is greater than the supply of bonds, showing consumers' high interest in supporting investment to confront climate change in Connecticut.

Green bonds are certified and verified by a third-party for consumer protection.

Connecticut's Solar Industry

16,355 Jobs created

$44.8 million Tax revenue generated

6,688 Direct | **9,667** Indirect and induced

Environmental Impact

Through the production of zero emission renewable energy, the lifetime reduction of greenhouse gases is equivalent to:

5.9 million Tons of CO_2

653,862 Homes energy use

6.6 million Acres of forests

13.6 billion Miles driven

$425.1 million Public health cost reduction from cleaner air

*Average incentive over life of the program

May 12, 2023

Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004
ggrf@epa.gov

SUBJECT: Public Comments from the Connecticut Green Bank – Written Comment: Greenhouse Gas Reduction Fund Implementation Framework Docket ID No. EPA-HQ-OA-2022-0859

Dear Administrator Regan:

The Connecticut Green Bank ("Green Bank") values the U.S. Environmental Protection Agency's ("EPA") invitation to provide comments regarding the Implementation Framework ("Framework") for the Greenhouse Gas Reduction Fund ("GGRF"). The Framework invites written technical feedback and comments on the design and implementation of the GGRF.

As the nation's first state-level green bank, the Green Bank leverages the limited public resources it receives to attract multiples of private investment to scale up clean energy deployment. Since its inception, the Green Bank has mobilized $2.26 billion of investment into Connecticut's clean energy economy at a 7 to 1 leverage ratio of private to public funds. The Green Bank has supported the creation of 27,720 direct, indirect and induced jobs, reduced the energy burden on over 66,500 families and businesses, deployed nearly 510 MW of clean renewable energy, helped avoid 10.4 million tons of CO2 emissions over the life of the projects, and generated $113.6 million in individual income, corporate, and sales tax revenues to the State of Connecticut.

For a more complete overview of the green bank model and the impact of the Green Bank – see Attachments A and B.

As a tool to support the increased and accelerated development of the state's green economy, the Green Bank's efforts assist the implementation of public policy for the State of Connecticut, including:

- **Reducing Greenhouse Gas Emissions** – no less than 45 percent reduction from 2001 levels by 2030,[1] 100% decarbonized electric sector by 2040, and no less than 80% reduction from 2001 levels by 2050;

[1] Consistent with the Nationally Determined Contribution of 50-52 percent reduction of 2005 levels by 2030

- **Justice 40** – within various incentive programs,[2] as well as its incentive and financing programs for clean energy and environmental infrastructure, the Green Bank has established a goal of no less than 40 percent of investment and benefits directed towards vulnerable communities;[3] and

- **Just Transition** – enabling workforce development programs, including pre-apprenticeship and apprenticeship training, paying prevailing wages, and requiring community benefits agreements for certain type of renewable energy project.[4]

These important foundational public policies to reduce greenhouse gas emissions, while delivering benefits from mobilizing financing and private capital investment in and deployment of such projects in communities, particularly low-income and disadvantaged communities ("LIDACs"), is what the Green Bank does in collaboration with its public, quasi-public, nonprofit, and private partners.

Through the GGRF, the Green Bank supports the implementation of specific public policies in Connecticut – many of which are priority project areas[5] identified by the EPA – including, but not limited to:

- **Renewable Portfolio Standard** – customer sited distributed power generation (e.g., solar PV) to support Connecticut's 40 percent by 2030 Class I renewable portfolio standard, while reducing energy burden (i.e., reducing inflation) for participating families, businesses, and nonprofit organizations;

- **Battery Storage** – customer sited battery storage of 580 MW from zero-emissions power sources to support Connecticut's 1,000 MW by 2030 battery storage target, while increasing energy security (i.e., increasing resilience) for participating families, businesses, and nonprofit organizations;

- **Weatherization** – weatherizing 80 percent of residential housing units (i.e., over 1.1 million units) by 2030; and

- **School Buses** – enabling the deployment of 100 percent zero emission school buses within environmental justice communities by 2030, and all school districts by 2040.

These are the public comments of the Green Bank on the Framework, specifically with respect to the Executive Summary as well as the National Clean Investment Fund ("NCIF") and the Clean Communities Investment Accelerator ("CCIA").

Separately from these public comments, a Connecticut Consortium inclusive of the Green Bank, submitted comments on the "Solar for All" aspects of the GGRF Framework.

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[2] Residential Renewable Energy Solutions and Energy Storage Solutions

[3] Per Public Act 20-05, "vulnerable communities" means populations that may be disproportionately impacted by the effects of climate change, including, but not limited to, low and moderate income communities, environmental justice communities pursuant to section 22a-20a, communities eligible for community reinvestment pursuant to section 36a-30 and the Community Reinvestment Act of 1977, 12 USC 2901 et seq., as amended from time to time, populations with increased risk and limited means to adapt to the effects of climate change, or as further defined by the Department of Energy and Environmental Protection in consultation with community representatives.

[4] Public Act 21-43 – "An Act Concerning a Just Transition to Climate-Protective Energy Production and Community Investment"

[5] Distributed Power Generation and Storage, Decarbonization Retrofits of Existing Buildings, and Transportation Pollution Reduction

Table of Contents

Section 1: Comments on the Executive Summary

With respect to the Executive Summary, the Green Bank provides the following comments.

1. **Technologies vs. Projects and Activities**
   Throughout the Framework, the EPA prioritizes the investment in and deployment of clean energy technologies (e.g., Priority Project Categories). While certainly important, beyond technology, the EPA should acknowledge that there are other projects and activities that can achieve the GGRF program objectives and priorities as well. As a point of reference, the GGRF could draw upon the qualified projects noted in the Clean Energy and Sustainability Accelerator ("CESA") that also includes agriculture and forestry projects and climate resilient infrastructure.

2. **Community Roundtable Invitation**
   Beyond the important online listening sessions and written public comments being sought by the EPA, it is outstanding that it is meeting stakeholders in neighborhoods across the country (e.g., Houston, TX) to share the impact of the GGRF for renters and homeowners, small business owners, local government leaders, and others. On behalf of the State of Connecticut, the Green Bank would like to invite the EPA to host a roundtable in Bridgeport – an "energy community,"[6] vulnerable community, and Communities LEAP community[7] – to communicate the impact the GGRF can make and hear directly from our communities.

3. **Complementary Requirements**
   Beyond the GGRF's program objectives, it will advance the Biden-Harris Administration's other priorities, which the Green Bank supports, including:

   - **Build America, Buy America** ("BABA") – to bolster America's industrial base, protect national security, and support high paying jobs, BABA obligates projects to use iron, steel, manufactured products, and construction materials produced in the U.S. As key aspects of the investment tax credit adders for "domestic content," BABA presents unique opportunities for US manufactured materials deployed in communities across the country. The resource links provided by the EPA certainly help potential applicants understand the implications of BABA on projects,[8] but it would be useful if in the NOFO the EPA could apply BABA to a sample set of qualified projects (including "Priority Project Categories") from different end-user beneficiary perspectives (e.g., renter, homeowner, small business, municipal facility, non-governmental nonprofit facility) to speak to whether or not BABA applies. Perhaps this could be included in an FAQ.

   - **Labor and Good Quality Job** – workers indeed know the value of a good job that provides stability and security for them and their families. Allowing everyone to share in the prosperity that the green economy is creating will support local communities and the entire economy. The EPA, working across the federal government with the Department of Labor ("DOL"), and with state and municipal governments, should provide ongoing technical assistance for workforce development (e.g., successfully implementing the prevailing wage and apprenticeship requirements in the investment tax credit, enabling successful preparation and implementation of community benefit agreements). This would be an area of technical assistance from the EPA, with an across government DOL partner, that would be of value to Applicants and Sub-Awardees.

   - **Equity and Justice 40** – improving the lives of Americans, particularly in LIDACs, is the impact the GGRF seeks to achieve. Alongside the EPA, many states, territories, municipalities, and nonprofit

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[6] Per the 10% adder within the new investment tax credit provisions of the IRA for (1) retired coal-fired power plant, (2) likely statistical area, and (3) multiple brownfields

[7] https://www.energy.gov/communitiesLEAP/communities-leap

[8] https://www.epa.gov/system/files/documents/2023-02/OLEM_BABA_FAQs_Final-Feb_15_2023.pdf - see page 9.

organizations share this perspective. The Framework indicates that the pending Notice of Funding Opportunity ("NOFO") will provide additional guidance on the definition of LIDACs located outside of geographies identified by the Climate and Economic Justice Screening Tool ("CEJST"). As recommended by eleven (11) states[9] and a territory[10] in public comments submitted to the EPA on December 5, 2022, to further support equitable funding deployment and to enable leveraging of existing programs and funding streams, permit the use of state-specific definitions for "low income," "disadvantaged communities," and other related terms such as "environmental justice zones". The EPA could request NOFO and Notice of Intent ("NOI") applicants to justify their respective state and/or territory definitions if different from the CEJST.

- **Tribal Nations** – respecting the sovereignty and self-governance of 574 federally recognized tribes and ensuring that they have the opportunity to benefit from the GGRF, is important across all three of the $27 billion competitions. Beyond the financial assistance provided through the GGRF, the Green Bank would suggest that tribal nation support be another area of across government technical assistance (i.e., Department of Energy, Department of Interior, Department of Agriculture), including provision of public and/or subcontracted project development, legal, and financial expertise. Like LIDACs, the ability to stack investment tax credit adders (e.g., energy communities, low income, domestic content) and direct payment of such tax credits, presents a unique opportunity for tribal ownership of projects, potentially through community benefit agreements that could enable sharing in project equity by tribes. The EPA's collaboration with the DOE on the Environmental Justice Thriving Communities Technical Assistance Centers program is an excellent start! That collaboration could be further strengthened by the co-administration of Section 48(e) of the Internal Revenue Code (i.e., Low-Income Communities Bonus Credit Program) by DOE and Department of Treasury, especially through a permanent allocation within Category 2.

- **National Environmental Policy Act** – despite the importance of NEPA, the Green Bank acknowledges that it will not apply to the GGRF.

The Green Bank recognizes the importance of these complementary requirements. Since the Framework includes "Priority Project Categories," two of which are likely to lead to the deployment of clean energy in residential end-use sectors, it would be useful if the EPA were to (1) give examples of how the complementary requirements apply to such categories (or not) for residential end-use sectors, and (2) speak to the applicability of SEP Program Notice 10-008F revised by the DOE on November 10, 2020.[11]

4. Ensuring Justice 40

As detailed in the Framework of the GGRF, to align with the Justice40 Initiative, 40% of overall benefits from the programs must flow to disadvantaged communities. We recommend that the EPA provide additional clarity around how 'benefits' will be evaluated. As an example, the EPA could reference the eight policy priorities recommended to the DOE by the Office of Economic Impact and Diversity[12]. These policies clarify that while projects can decrease energy burden in disadvantaged communities other benefits, such as increasing energy resilience and clean energy job training, are also priority benefits.

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[9] Connecticut, Colorado, Illinois, Louisiana, Maine, Michigan, Nevada, New Jersey, New Mexico, Pennsylvania, and Vermont
[10] Puerto Rico
[11] https://www.energy.gov/scep/articles/sep-program-notice-10-008f-guidance-state-energy-program-grantees-financing-programs
[12] Justice40 Initiative | Department of Energy

Section 2: Comments Regarding the National Clean Investment Fund

The Framework does an outstanding job providing greater clarity with respect to the $20 billion allocated under Section 134(a)(2-3) of the Clean Air Act, specifically the $14 billion to the proposed NCIF. The Green Bank wants to acknowledge and thank the EPA for providing this additional guidance through the Framework. As the Framework notes that Applicants are permitted to participate in multiple applications within the NCIF, as well as across the other competitions,[13] and presumably applicable to Sub-Awardees as well, the Green Bank intends to join coalitions of community lenders, which include green banks, within the NCIF competition.

With respect to the NCIF, the Green Bank provides the following comments.

1. **Eligible Financial Assistance**

   The Framework makes it clear that the funds allocated to the NCIF are to be used for "financial assistance" that is consistent with the definition of "Federal Financial Assistance" in 2 CFR § 200.1[14] (i.e., grants are not considered as a financial product). However, the Framework also notes that the "EPA expects that these financial products will involve substantially better-than-market interest rates passed through to borrowers."[15] There are two things to note, including (a) the use of the term "substantially," which the EPA should provide further clarity on (e.g., provide an example), and (2) whom the lower interest rates must be directed (i.e., "passed through to borrowers" which the Green Bank presumes to benefit end-use customers (e.g., families and businesses) as opposed to Sub-Awardees or their private capital partners. This may need greater clarity from the EPA, as this point on "substantially better-than-market interest rates…," is noted throughout the Framework.

2. **Priority Project Categories and Qualified Projects**

   In the Framework of the GGRF, the EPA identifies "Priority Project Categories" within the NCIF, as well as noting that beyond technologies, other projects and/or activities must deliver benefits by alleviating two or more of the following categories of burdens: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. In June 2021, Connecticut Governor Ned Lamont led a bipartisan effort to expand the scope of the Green Bank beyond "clean energy" to include "environmental infrastructure"[16] through the passage of Public Act 21-115[17].

   In addition to the "qualified projects" included within the proposed CESA policy, and in support of "environmental infrastructure" to "confront climate change" within Connecticut, the Green Bank would recommend the following additional "qualified projects" be <u>at least noted or examples provided</u> (emphasis intentionally added) as eligible within the NOFO for the NCIF:

   - Agriculture projects that reduce net greenhouse gas emissions
   - Forestry projects that reduce net greenhouse gas emissions
   - Waste and recycling projects that reduce net greenhouse gas emissions
   - Climate resilient infrastructure

   Improving access to green community spaces in vulnerable communities, can restore brownfields and abandoned lots, reduce GHG emissions, increase resilience against the impacts of climate change (e.g.,

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[13] EPA GGRF Implementation Framework (Page 12)

[14] Including, but not limited to loans, equity investments, loan guarantees, credit enhancements, forgivable and partially forgivable loans, purchase of loans, lines of credit, and debt with equity features.

[15] EPA GGRF Implementation Framework (Page 14)

[16] "Environmental Infrastructure" means structures, facilities, systems, services, and improvement projects related to water, waste and recycling, climate adaptation and resiliency, agriculture, land conservation, parks and recreation, and environmental markets (e.g., carbon offsets, ecosystem services).

[17] "An Act Concerning Climate Change Adaptation" – click here

flooding, stormwater management), and improve health wellness.[18] There are a number of nature based solutions that have quantifiable measurement, reporting, and verification protocols that can demonstrate GHG emission reductions, that also deliver important public health benefits, especially in LIDACs.

> *"Spending time and living near green spaces have been associated with various improved mental health outcomes, including less depression, anxiety, and stress. Several studies have demonstrated a dose-response relationship between more time spent in green spaces and lower depression rates. Therefore, green space may be a potential buffer between inequitable neighborhood conditions and poor medical health outcomes."*[19]

Based on the outreach and engagement[20] we have undertaken to better understand the need in these areas, we feel confident that the same public-private partnerships tools for financing that we have successfully leveraged to increase and accelerate investment in clean energy technologies to benefit vulnerable communities, can be applied to meet the GGRF objectives through projects and activities involving environmental infrastructure.

3. **Application Components**
The Framework does an excellent job providing prospective applicants with information from which they can begin to assemble the components of their application once the EPA releases the NOFO in June of 2023.

4. **Transparency**
The Framework does an excellent job providing guidance on transparency in terms of the use of taxpayer dollars and the impact of those dollars on the GGRF program objectives.

5. **EPA Regional Office Contact**
For each of the competitions, the Framework indicates that "EPA staff will not meet directly with prospective applicants or their representatives to discuss this competition or otherwise provide any potential applicant with an unfair competitive advantage."[21] It also indicates "The plan [Program Linkages Plan] may include specific references to partnering with the EPA, such as the EPA Regional Offices in the region in which they intend to do business."[22] Beyond the "Priority Project Categories" noted in the Framework, there may be opportunities that the EPA's regional offices might want to pursue or encourage through partnerships with an Applicant and/or an Applicant's Sub-Awardees. The EPA should clarify in the NOFOs on whether or not Applicants, and/or their public, quasi-public, nonprofit, and/or private Sub-Awardee partners, can speak with EPA Regional Office officials about the GGRF and NCIF given the discouragement of contact with such officials, yet encouragement of partnerships with such regions noted in various places within the Framework.

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[18] https://www.ctgreenbank.com/wp-content/uploads/2023/01/Environmental-Infrastructure_Parks-and-Recreation_Oct-16-2022.pdf
[19] Effect of Greening Vacant Land on Mental Health of Community-Dwelling Adults by Eugenia C. South, et al. Jama Network Open (July 20, 2018)
[20] Planning - CT Green Bank | Accelerating Green Energy Adoption in CT
[21] EPA GGRF Implementation Framework (Page 12)
[22] Ibid (Page 20)

Section 3: Comments Regarding the Clean Communities Investment Accelerator
Again, the Framework does an outstanding job providing greater clarity with respect to the $20 billion allocated under Section 134(a)(2-3) of the Clean Air Act, specifically the $6 billion to the proposed CCIA. The Green Bank wants to acknowledge and thank the EPA for providing this additional guidance through the Framework, and note that there is a large and growing number of community lenders at various stages of development or existence that are excited about this support, including many in Connecticut. The Green Bank intends to join coalitions of community lenders, which include green banks, within the CCIA competition, and is considering applying itself as a nonprofit organization.

1. **Grant Activities**
   The Green Bank appreciates the EPA's efforts to build a robust network of nonprofit community lenders across the country, including community development financial institutions (CDFIs), credit unions (CUs), housing finance agencies, minority depository institutions (MDIs), green banks, and others. The Green Bank works closely with CDFIs, CUs, and housing agencies in Connecticut to advance our climate change and clean energy policy objectives. For the Green Bank, the capitalization funding of $5 million will enable us to start new programs to finance emissions- and air pollution-reducing projects in LIDACs. There are also a number of other Green Bank partner CDFIs, CUs, and housing agencies in Connecticut, that would benefit from these resources to further build on the state's ecosystem of community-based financing partners.

2. **Technical Assistance**
   The technical assistance allocation of 12.5% of $5 million capitalization funding, or $625,000, is likely to be sufficient for existing community lenders (e.g., green banks) with appropriate green products, but for new or start-up community lenders or existing lenders without green product experience, this level of technical assistance may be insufficient. In terms of the technical assistance that the EPA intends to provide, it will be important that it be specific (e.g., Environmental Justice Thriving Communities Technical Assistance Centers) and communicate to potential Applicants and Sub-Awardees its intentions so that they can plan accordingly. The EPA's efforts to work across government with the DOE presents an opportunity to leverage expertise and resources to increase impact.

3. **National Credit Enhancement**
   With respect to cross government engagement, the EPA might work with the Loan Programs Office ("LPO") of the DOE to establish a national loan loss reserve fund for community lenders, with a focus on the "Priority Project Categories". With the new State Energy Financing Institutions ("SEFI") provisions within Title 17 of the LPO, there is an opportunity to leverage DOE resources to provide loan guarantees for community lenders, especially those serving LIDACs and tribal communities. The Green Bank, as a SEFI, is willing to support the EPA and/or DOE with such an effort, as appropriate.

4. **Nonprofit Organization Definition**
   The Green Bank appreciated the additional guidance provided by the EPA with respect to the definition of a "nonprofit organization" as set forth in 2 CFR § 200.1, which:

   - "means any corporation, trust, association, cooperative, or other organization, not including Institutes of Higher Education,…" – the Green Bank is a quasi-public organization, public instrumentality and political subdivision of the state of Connecticut and therefore qualifies as an "other organization".[23]

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[23] The Connecticut Green Bank is hereby established and created as a body politic and corporate, constituting a public instrumentality and political subdivision of the state of Connecticut established and created for the performance of an essential public and

- "…that: (1) is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest;…" – the Green Bank certainly is operated primarily for service in the public interest, and whose purpose is consistent with the GGRF.[24]

- "…(2) is not organized primarily for profit;…" – the Green Bank is not organized for profit, but instead the mission is to "confront climate change by increasing and accelerating investment into Connecticut's green economy to create more resilient, healthier, and equitable communities."[25]

- "…and, (3) uses net proceeds to maintain, improve, or expand the operations of the organization." – the Green Bank invests all public revenues, including earned revenues (e.g., interest payments, renewable energy credit revenues), into programs and products that support its purpose and mission.

In addition to providing further clarity on "nonprofit organization" set forth in 2 CFR § 200.1, the additional factors of "eligible nonprofit recipient" under Section 134(c)(1) of the Clean Air Act are clearer for the Green Bank, including:

- "…(2) is designed to provide capital, leverage private capital, and provide other forms of financial assistance for the rapid deployment of low- and zero-emission products, technologies, and services;…" – the Green Bank is designed for this purpose.

- "…(3) does not take deposits other than deposits from repayments and other revenue received from financial assistance provided using grant funds under this program;…" – the Green Bank does not take such deposits.

- "…(4) is funded by public or charitable contributions;…" – the Green Bank is funded by both public and charitable contributions.

- "…and (5) invests in or finances projects alone or in conjunction with other investors." – the Green Bank invests in or finances projects alone, but preferably in conjunction with other private investors.

Based on the above, and the additional clarity provided by the EPA within the Framework, the Green Bank believes that it qualifies as a "nonprofit organization" and would be eligible to apply for the CCIA. The

governmental function. The Connecticut Green Bank shall not be construed to be a department, institution or agency of the state. Quasi-public agencies are independent government corporations that are created through legislation to perform a particular service or set of public functions.

[24] The purposes of the Green Bank pursuant to CGS 16-245n are within its Resolution of Purpose – click here and relevant language includes:

"The Connecticut General Assembly has found and determined that (i) stimulating, supporting and increasing the use of clean energy, investment in clean energy projects and sources, demand for clean energy, and the development of the state's energy-related economy are important state policy objectives and (ii) financing, supporting and promoting investment in environmental infrastructure and related enterprises are critical state policy objectives for adapting to a changing climate. To achieve those objectives, the General Assembly, among other things, created and empowered the Connecticut Green Bank.

Such purposes for clean energy include but are not limited to: (1) implementing the Comprehensive Plan developed by the Green Bank pursuant to Section 16-245n(c)(1), as amended; (2) developing programs to finance and otherwise support clean energy investment in residential, municipal, small business and larger commercial projects, and such others as the Green Bank may determine; (3) supporting financing or other expenditures that promote investment in clean energy sources to foster the growth, development, and commercialization of clean energy sources; and (4) stimulating demand for clean energy and the deployment of clean energy sources within the state that serve end-use customers in the state."

[25] Comprehensive Plan of the Connecticut Green Bank

Green Bank believes that it meets the federal regulatory definition under 2 CFR § 200.1 as a "nonprofit organization", as well federal statute as an "eligible nonprofit recipient" under Section 134(c)(1) of the Clean Air Act, and can provide appropriate documentation.

Notwithstanding the forgoing, in the event that EPA determines that quasi-public organizations, instrumentalities and political subdivisions of States do not fall under the definition of "nonprofit organization" as set forth in 2 CFR § 200.1, then EPA should confirm that a subsidiary corporation, including a 501(c)3 nonprofit corporate, created by such quasi-public organization, instrumentality or political subdivision is eligible to meet the "nonprofit organization" definition, subject to all the requirements therein.

5. **Priority Project Categories and Qualified Projects**
   Same comment as above within the NCIF public comment section.

The Green Bank appreciates EPA's efforts to solicit public comment on the GGRF Framework, and specifically the NCIF and CCIA. The Green Bank looks forward to working with our partners in Connecticut, and across the country, to submit applications for consideration into the pending solicitations.

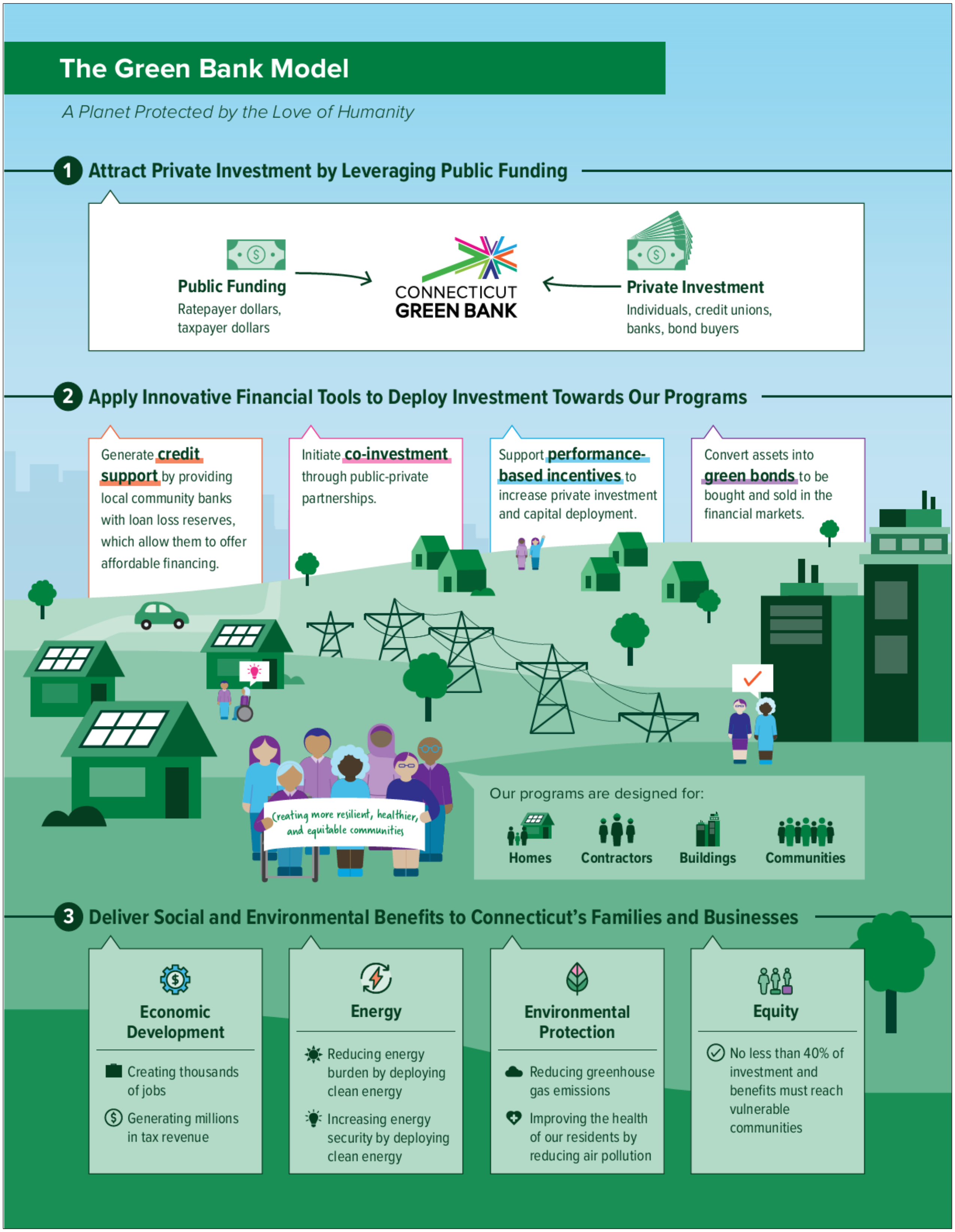
Sincerely,

Lonnie Reed	*Bryan Garcia*
Lonnie Reed Chair	Bryan Garcia President and CEO
Sara Harari	*Bert Hunter*
Sara Harari Associate Director of Innovation	Bert Hunter EVP and CIO
Eric Shrago	*Ashley Stewart*
Eric Shrago VP of Operations	Ashley Stewart Manager of Community Engagement

Attachments
Attachment A – Green Bank Model
Attachment B – Societal Impact Report

ATTACHMENT A

Green Bank Model



ATTACHMENT B

Societal Impact Report of the Connecticut Green Bank

CONNECTICUT GREEN BANK

Societal Impact Report

FY12 FY22

Since the Connecticut Green Bank's inception through the bipartisan legislation in July 2011, we have mobilized more than **$2.26 billion of investment** into the State's green economy. To do this, we used **$322.4 million** in Green Bank dollars to attract $1.95 billion in private investment, a leverage ratio of **$7.00 for every $1**. The impact of our deployment of renewable energy and energy efficiency to families, businesses, and our communities is shown in terms of economic development, environmental protection, equity, and energy (data from FY 2012 through FY 2022).

ECONOMIC DEVELOPMENT

JOBS The Green Bank has supported the creation of more than **26,720** direct, indirect, and induced job-years.

TAX REVENUES The Green Bank's activities have helped generate an estimated **$113.6** million in state tax revenues.

- **$55.3 million** individual income tax
- **$29.2 million** corporate taxes
- **$29.1 million** sales taxes

ENERGY

ENERGY BURDEN The Green Bank has reduced the energy costs on families, businesses, and our communities.

60,000+ families

6,500+ businesses

DEPLOYMENT The Green Bank has accelerated the growth of renewable energy to more than **509 MW** and lifetime savings of over **65.6 million MMBTUs** through energy efficiency projects.

ENVIRONMENTAL PROTECTION

POLLUTION The Green Bank has helped reduce air emissions that cause climate change and worsen public health, including **9.6** million pounds of SOx and **11.1** million pounds of NOx lifetime.

10.4 MILLION tons of CO_2: EQUALS

156 MILLION tree seedlings grown for 10 years

OR

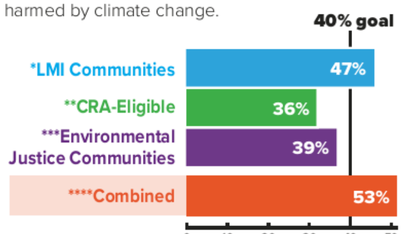
2.1 MILLION passenger vehicles driven for one year

PUBLIC HEALTH The Green Bank has improved the lives of families, helping them avoid sick days, hospital visits, and even death.

$317.1 – $717.2 million of lifetime public health value created

EQUITY

INVESTING in vulnerable communities, The Green Bank has set **goals** to reach **40% investment** in communities that may be disproportionately harmed by climate change.



*LMI Communities – census tracts where households are at or below 100% Area Median Income.

**Community Reinvestment Act (CRA) Eligible – households at or below 80% of Area Median Income and all projects in programs designed to assist LMI customers.

***Environmental Justice Community means a municipality that has been designated as distressed by Connecticut Department of Economic and Community Development (DECD) or a census block group for which 30% or more of the population have an income below 200% of the federal poverty level.

****Combined Vulnerable Communities include LMI, CRA and EJC.

Learn more by visiting ctgreenbank.com/strategy-impact/impact

Winner of the 2017 Harvard Kennedy School Ash Center Award for Innovation in American Government, the Connecticut Green Bank is the nation's first green bank.

Sources: Connecticut Green Bank Comprehensive Annual Financial Reports

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