

Solar for All – Community Shared Solar Grant Program Stakeholder Questions

The Massachusetts Department of Energy Resources (“DOER”) is seeking comments and feedback from the public on the following topics relevant to an upcoming funding opportunity for Community Shared Solar (“CSS”) projects. DOER has received a \$156 million award from the Environmental Protection Agency (“EPA”) to launch the Massachusetts Solar for All (“MASFA”) program, which aims to expand access to clean and affordable solar energy to low-income and disadvantaged communities in Massachusetts. As part of the MASFA program, DOER will administer a **MASFA Community Shared Solar Grant Program** (“Program”) to provide competitive grant funding for CSS projects serving Massachusetts residents that meet the definition of Low Income and Disadvantaged Communities (“LIDAC”) as defined by EPA.¹ Projects must provide energy bill savings and other meaningful benefits through the development, installation, and operation of CSS projects. Grant funding will be awarded competitively based on applicants demonstrating how they will maximize financial and other benefits to LIDAC residents and communities.

DOER is developing a Program Opportunity Notice (“PON”) to solicit applications from CSS project developers, owners, and other stakeholders. To assist in development of the PON and grant program, DOER is requesting feedback on the following questions and topic areas. Please be as specific as possible in your responses and include any relevant examples or suggestions.

Who Should Respond

DOER welcomes comments from any developers or owners of CSS projects, CSS subscription managers, or any other interested stakeholders or community members.

Submission of Comments

Please submit all comments to Kerry Judge at kerry.judge1@mass.gov as soon as possible, but no later than 5:00 PM on June 4, 2025. Please include “MA Solar for All CSS Comments” and name of the individual or organization submitting comments in the subject line. Please do not include any confidential or sensitive information in your submission.

MASFA CSS Grant Questions

A. Procurement Schedule

1. What factors should DOER consider when designing the procurement schedule for the Program?
2. How can the procurement schedule be designed to best align with other project development milestones, such as interconnection and Solar Massachusetts Renewable Target (“SMART”) applications?
3. Per EPA requirements, all funds must be expended by the end of the Solar for All period of performance (August 31, 2029). How should DOER consider this timeline in assessing project readiness?

B. Project Eligibility

¹ For more details on how EPA defines LIDAC residents, please refer to our MA Solar for All website: <https://www.mass.gov/info-details/solar-for-all-eligibility>

1. It is DOER's intent that projects receiving grant funds under this Program will be required to participate in the SMART program. How should DOER consider projects' SMART qualification status and timeline in the eligibility criteria for the CSS grant program?²
2. How should DOER consider projects' status in the interconnection queue when determining eligibility and/or evaluating proposals?
3. Please provide any other comments or suggestions regarding DOER expending all Solar for All funds by August 2029.

C. Project Benefits

1. Per EPA requirements, all community solar projects receiving MASFA funds must, at a minimum, enroll 50% qualified LIDAC residents as off takers and deliver 20% savings on LIDAC residents' entire electric bill for the life of the project.³ DOER is seeking competitive project proposals that go above and beyond the minimum requirements to maximize financial and other benefits to eligible communities. How can DOER structure grant awards to maximize the benefits to LIDAC residents and communities?
2. How should DOER weigh the role of additional community benefits (beyond minimum savings requirements) when evaluating projects? Additional community benefits may include local workforce commitments, resiliency benefits, innovative approaches to equitable access, and community ownership.
3. Are there other creative or innovative community benefits that DOER should consider when evaluating projects? If so, what are they?
4. How can DOER establish project eligibility and evaluation criteria to ensure SFA funds support projects that incorporate advanced labor standards such as fair living wages and benefits, community benefits agreements, commitments to local hiring from LIDAC communities, incorporation of training opportunities or registered apprenticeship programs, and supplier diversity?

D. Other Considerations

1. How can DOER design the Program to encourage the participation of projects sited in the built environment or those sited in preferred locations? (ie. Roof-mounted, canopy, landfill, and brownfield projects).
2. How can DOER design the Program to encourage an equitable geographic distribution of projects across Massachusetts?
3. How should DOER weigh consumer protection measures in subscriber contracts when evaluating projects? What consumer protection measures should DOER require in subscriber contracts?
4. How should DOER evaluate proposed outreach and engagement strategies for customer acquisition? What minimum measures should DOER require for all projects?

² Please note that the MASFA Coalition will offer a separate funding opportunity for CSS projects located in Municipal Light Plant ("MLP") communities which are not eligible for SMART.

³ Net savings based on average electric bill (supply and delivery) in the utility territory and including any CSS payments, sign-up fees, etc.

E. Davis-Bacon and Related Acts Compliance

Per EPA Greenhouse Gas Reduction Fund (“GGRF”) requirements, state programs that deploy federal funding must comply with certain federal regulations, including rules regarding worker protection, local wages, and benefits under the Davis- Bacon and Related-Acts (DBRA). The Davis-Bacon Act (DBA, Public Law 107-217), enacted in 1931, requires the payment of **locally prevailing wages and fringe benefits to various classes of laborers and mechanics performing similar types of work at the site of work on a weekly basis** for federal contracts for **construction, alteration, or repair of a public building or public work** in excess of \$2,000.

These standards require DBRA wages set by the Department of Labor (“DOL”) as well as a compliant administrative process. With regards to DBRA compliance and reporting, participants can expect:

- **Direct Effects on Wages** (dependent on location): ensure prevailing wage and fringe benefits as determined by the DOL are met.
 - **Ongoing Operations & Maintenance:** DBRA requires contractors and subcontractors to:
 - comply with weekly payment schedules;
 - maintain payrolls and records that list specific job classifications, wages, and time spent in detail;
 - submit weekly records for all weeks in which contract work is performed and certify payrolls using DOL’s [Wage and Hour division forms](#);
 - keep records for three years after the end of a project;
 - periodically review processes and documentation to ensure compliance with applicable prevailing wages, including with subcontractors;
 - and perform audits.
1. How familiar are you with DBRA compliance and reporting? Do you have experience complying with DBRA requirements or working on projects that use DBRA compliant wages?
 2. What impact would the inclusion of DBRA requirements have on your ability to develop projects under the Program? If possible, please provide any information on additional costs or other barriers you would expect projects to face because of such requirements.

F. Please provide any other comments or feedback not addressed in the previous questions.