



National Association of State Energy Officials

September 25, 2024

Julie Zavala
Deputy Director, Greenhouse Gas Reduction Fund
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OA-2023-0393

Dear Deputy Director Zavala:

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments to the U.S. Environmental Protection Agency (EPA) in response to Docket ID Number EPA-HQ-OA-2023-0393 pertaining to the Greenhouse Gas Reduction Fund (GGRF) Information Collection Request (ICR). NASEO represents the 56 State and Territory Energy Offices across the nation. Approximately half of the State Energy Offices are direct recipients of the Solar for All Program (SFA) program, and most other State Energy Offices have partnerships with the agencies and organizations overseeing the other SFA allocations. NASEO established a State Solar Working Group to assist states in the implementation of SFA, and to facilitate communications with EPA on this important program. NASEO offers the following comments in response to the ICR:

- Ensure final SFA templates are tailored to SFA program reporting needs: The "US EPA GGRF Data Dictionary" file presents over 300 data elements that EPA believes may be relevant for quantitative reporting across all three GGRF programs: SFA, the National Clean Investment Fund (NCIF), and the Clean Communities Investment Accelerator. While the three programs are related, NASEO strongly recommends that the reporting templates delivered to SFA are tailored directly to program-specific needs, rather than an amalgam of all three programs – which have very different purposes – that various types of recipients will need to complete on their own. EPA should also consider customizable templates based on the type of SFA project (for example, community versus rooftop solar; projects that only provide grants or subsidies versus those that include financing; or solar-only projects versus those that include storage or enabling energy efficiency and/or electrification upgrades). Customized templates will enable easier data reporting and reduce recipients' confusion about required versus optional items.
Eliminate or clarify unnecessary data elements: Each data element proposed in the "US EPA GGRF Data Dictionary" offers important information about the characteristics of projects funded by SFA; however, as a whole, the reporting burden is significant, particularly for programs that offer financing and/or are

1300 North 17th Street
Suite 1275
Arlington, Virginia 22209
Telephone: 703.299.8800
www.naseo.org

BOARD OF DIRECTORS

Chair
JOHN WILLIAMS
New York

Vice Chair
MOLLY CRIPPS
Tennessee

Treasurer
EDDY TREVINO
Texas

Secretary
WILL TOOR
Colorado

Past Chair
ANDREW MCALLISTER
California

Regional Representatives

DAN BURGESS
Maine

KATIE DYKES
Connecticut

DAVE ALTHOFF
Pennsylvania

NICK BURGER
Washington, D.C.

MITCHELL SIMPSON
Arkansas

KENYA STUMP
Kentucky

JULIE STAVELAND
Michigan

EMILY WILBUR
Missouri

MICHAEL FURZE
Washington

RICHARD STOVER
Idaho

MARIA EFFERTZ
North Dakota

LYNN RETZ
Kansas

REBECCA RESPICIO
Guam

President
DAVID TERRY

General Counsel
JEFFREY C. GENZER

tailored for single family homes. EPA should consider making more data elements optional for SFA recipients, including items such as:

- DE064 - NAICS code;
- DE087 - Project Equipment Useful Life;
- DE108 – Community benefits delivered (rather than collecting quantitative data on community benefits, SFA recipients can report on them in their qualitative progress reports);
- DE121 - Rate of pay per worker median for new hires (construction);
- DE 122 - Rate of pay per worker median for new hires (non-construction); and
- DE-153 Capacity Factor (alternatively, if the capacity factor is needed, EPA can propose a sample of total projects from which to collect this information as part of the quality assurance program)

- **Clarify the point(s) in the project development cycle when certain data elements need to be reported:** Some data elements in the “US EPA GGRF Data Dictionary” are relevant throughout the life of a project, whereas others may only apply once a project has reached a specific milestone (such as approval of financing; interconnection to the grid; or operationalization). EPA should identify for recipients which data elements can be included in a one-time report versus those that would need to be updated in every semi-annual report.
- **Remove or make optional data requests that EPA can easily calculate or glean from other entries:** The “US EPA GGRF Data Dictionary” includes some data elements that EPA can calculate or process based on the information submitted by the grantee. For example, project site longitude and latitude (DE093 and 094) can remove the need for recipients to report on the project site city (DE088); state or territory (DE089); census tract code (DE091); census tract and block group year (DE092); and whether the project site qualifies as LIDAC in CEJST (DE263). EPA could also calculate the job estimates (DE113-DE116) based on other project data provided and the qualitative updates provided in the Solar for All Semi-Annual Progress Report Template. EPA should consider eliminating these redundant data requests or making them optional.
- **Consider streamlined Davis-Bacon reporting requirements for residential projects:** Davis-Bacon and Related Acts (DBRA) project-specific reporting and quality assurance needs can be particularly onerous for the contractors completing the work, since DBRA requirements flow down. NASEO strongly encourages EPA to explore streamlining the requirements for residential solar rooftop projects to ease DBRA reporting burdens.

Thank you for your consideration of this feedback. Please contact NASEO’s Senior Managing Director, Sandy Fazeli (sfazeli@naseo.org), to discuss this further with NASEO staff and [NASEO’s Solar Working Group of State and Territory Energy Offices](#).

Best regards,



David Terry, NASEO President