

## TCC Tribal Solar for All Program - Frequently Asked Questions (FAQs)

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### 1. Can additional funding be displayed on the budget application?

Yes. While only Solar for All (SFA) funds should be reflected in the SF-424 and tied to outputs/outcomes, applicants may describe other funding sources in the budget narrative. For example, if a tribal housing authority contributes staff time or if a nonprofit partner provides materials or technical support, those contributions can be highlighted to show program leverage. Just make sure only SFA funds are in the formal budget forms.

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### 2. Is land contribution an allowable in-kind match?

Yes. Land may be contributed as in-kind match if it supports the solar project and is properly documented. If the land is donated outright, the value of the match should be based on a current fair market appraisal. If the land is leased, the match can be calculated based on the lease amount over the life of the project. In either case, the contribution must be reasonable, necessary, and clearly tied to the implementation of the solar project, such as using a community-owned site for a ground-mounted array.

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### 3. Can salary/benefits be used as cost match?

It depends. Personnel time is an allowable cost. For example, if a village utility's technician helps coordinate project development, their time (wages and benefits) can count as cost share or leveraged funding. This must be tracked and supported with documentation.

If the source of funding for salary/benefits comes from a different federal funding source, this may not be used as cost match.

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### 4. Does non-required cost match labor for clearing land trigger EPA permitting?

Potentially yes. Even if the labor is donated and not paid for with federal funds, the activity may still require compliance with environmental or historic preservation regulations, such as Section 106 of the National Historic Preservation Act. If your project involves land disturbance, coordinate with TCC and EPA to determine if any review is required. If the funding for land prep comes from a different federal funding source this will trigger federal permit requirements.

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## 5. Can we use a dividend model for distributing benefits?

Yes. EPA supports multiple ways to provide household benefits. In dividend models a Tribe or utility sells power and distributes proceeds to participants. This is allowed if:

- Each household receives at least 20% savings annually (See question 9),
  - Participants are residential customers in the same utility territory,
  - Benefits are documented (e.g., dividend statements, bill credits).
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## 6. What are the income requirements for eligibility?

Eligible beneficiaries must meet the Low-Income and Disadvantaged Communities (LIDACs) criteria, which include:

- CEJST-identified or EJScreen-mapped areas,
- Households earning  $\leq 80\%$  of Area Median Income or  $\leq 200\%$  of the Federal Poverty Level,
- Residents of affordable housing,
- Members of federally recognized Tribes living in tribal communities or eligible tribal housing.

Participation in programs like SNAP, LIHEAP, WAP, or Tribal assistance programs can serve as income documentation.

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## 7. What is acceptable utility support documentation?

A utility letter of support is sufficient. Components of this letter may include:

- Endorsement of the project concept,
  - Commitment to interconnection support,
  - Willingness to facilitate billing models like net metering or consolidated billing if this is part of the business plan,
  - Acknowledgement that the project serves LIDACs.
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#### 8. Can TCC provide early feedback on submissions?

TCC will not provide feedback on early submissions in the name of fairness.

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#### 9. What counts toward the 20% net household savings?

Savings must be monetary and measurable. Examples include:

- \$35/month bill credit through net metering,
- Annual \$400 dividend check to households,
- Reduced energy bills due to on-site behind the meter solar use,
- Avoided service fees, if monetized.

If a household's typical bill is \$2,000/year, they must save at least \$400/year. Simply producing solar power is not enough—**the savings to the household must be documented.**

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#### 10. Can we use grant funds for batteries?

Yes, if they are **paired with a solar project** (not stand-alone). For example, installing batteries at a health clinic served by a rooftop solar array to ensure backup power is allowable. Describe in your workplan:

- Purpose of the storage,
- Size (e.g., 10 kWh),
- Cost and portion of total budget.

Note: no more than 20% of financial assistance can go toward enabling upgrades like storage.

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### 11. How much revenue from solar fields must go to households?

There is no specific revenue percentage. However, each household served must receive **at least 20% net energy cost savings**. The remaining revenue can be used for:

- Operations and maintenance (O&M),
  - Replacement reserves,
  - Workforce development,
  - Administrative costs.
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### 12. What are the caps on administrative costs?

There is no hard cap, but:

- At least 65% of the total budget should be for financial assistance (refer to question #14 for information on financial assistance),
- Admin and support (combined) should generally be  $\leq 35\%$ ,
- If using the 10% de minimis rate, it applies only to Modified Total Direct Costs (MTDC).

Cost Type	Suggested Maximum
Financial Assistance	$\geq 75\%$ of total budget
Admin (Direct + Indirect)	$\leq 25\%$ of total budget
Indirect (De Minimis)	10% of MTDC

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### 13. Can funds be used for design, surveying, and permitting?

Yes. These are eligible costs if they are essential to the project. Examples:

- Engineering design drawings,
- Environmental site survey,
- Land use permitting fees.

These must be clearly described in the budget and tied to project outcomes.

#### 14. What counts as direct financial assistance?

Direct financial assistance includes:

- Participant support (rebates, subsidies),
- Subawards (e.g., grants to community co-ops or housing groups),
- Contracts for solar installation,
- Credit enhancements (loan loss reserves, guarantees).

For example, buying solar panels to install on a community center that offsets costs for Tribal housing residents would count if:

- ≥50% of the benefit of the community solar project reaches residential LIDAC households,
- The project is within the same utility territory,
- The cost is documented in your budget.

Activity	Direct Financial Assistance?
Household solar rebate	Yes (Participant Support)
Community solar subscription support	Yes (Participant Support)
Grant to nonprofit for installation	Yes (Subaward)
Panel purchase for LIDAC households	Yes
Staff time for outreach	No (Admin/Tech Assistance)

### 15. What are the requirements for residential-serving community solar?

Community solar projects must:

- Be  $\leq 5$  MWac in size,
- Deliver  $\geq 50\%$  of project benefits (e.g., credits, savings) to **residential customers**,
- Serve customers **in the same utility territory** as the system.

These conditions ensure the benefits of the solar project are reaching the intended households.