



To: Maryland Energy Administrative Solar Incentives Task Force
From: Revolution Solar on behalf of MD Low-to-Moderate Income Households
Re: Proposed Adjustments to the Solar Grants and Incentives

As a Maryland solar company experienced with working with Low-to-Moderate Income (LMI) households, we would like to emphasize the need for a focus on LMI programs within the framework of the proposed grants and programs being considered by the Task Force.

From our experience the current MEA Residential Clean Energy Rebate Program has had little positive impact on LMI qualified households. Within the funding limits and balance of the residential rooftop solar we believe the LMI carveout should be the largest share.

- Allocate \$1.50/W for verified LMI household solar projects.
 - The expected average system size for 100% annual electrical offset is 5-7kW.
 - The current grant fund of \$5 million could implement over 550 projects and 3+ MW.
- Petition recipients of the Electric Universal Service Program (EUSP) to convert to solar using the LMI grant.
 - Solar module system would cover 100% of their annual electrical usage.
 - EUSP funding (currently \$80MM/year) would return to the state by making LMI homes net-zero.

We also suggest that the Maryland Energy Storage Income Tax Credit be eliminated to free up funding for MEA's other clean energy programs. Last year, the Federal Residential Clean Energy Credit was extended to include a 30% Federal tax credit for battery storage. If the Maryland Energy Storage Income Tax Credit remains in-place, Marylanders could qualify for both programs and effectively have 60% of their battery storage cost covered. Unlike MEA's other clean energy programs, promoting battery storage offers little environmental benefit as compared to solar, especially for LMI customers. In states without net-metering, storage is not required to reap the benefits of solar; however, Maryland's net-metering program allows the full benefits of solar

without the expensive investment in battery storage. From our experience, battery storage is a luxury item that is taken advantage of by only our wealthiest customers.

- Prioritize LMI solar funding over a statewide Clean Energy Rebate.
- Use Maryland Energy Storage Income Tax Credit for LMI funding.

We believe the combination of an appropriate grant program with the availability of the Federal Tax Credit, low-income adders provided by the IRA, and leveraging of the MD SRECs, it is possible to create low and/or no cost solar programs for LMI homeowners throughout Maryland. Solar installers can utilize these tools and short-term financing to provide homeowners with solar module systems capable of producing 100% of their annual electrical usage.

Background

Revolution Solar is the current solar installer for the Baltimore Shines project, funded by FY22 and FY23 MEA Low Income Solar Grant Program through Civic Works. We are also a 2022 and 2023 solar installer for the Washington DC Solar For All program. We have completed over 2000 solar installations in Maryland, DC, and Virginia with over 50% of those installations being Low-to-Moderate Income households.