

Summary of NRECA Response to DOE's Request for Information on Energy Improvements in Rural or Remote Areas (DE-FOA-0002841_RFI)

Overview

NRECA submitted responses to DOE's Request for Information on energy improvements in rural or remote areas on November 28, 2022.

NRECA's comments, shaped by a multi-departmental team within NRECA and member input can be summarized as follows:

- **NRECA Consortia:** These entities serve an important facilitation and collaboration role in the pursuit of assisting NRECA members to navigate various funding and research opportunities such as the Rural or Remote Areas initiative. The consortia present DOE with a favorable avenue to fund smaller projects in communities that otherwise may be hard to reach.
- **NRECA Expertise:** The organization is currently involved in several initiatives that are relevant to this DOE funding opportunity. Among these are the Advancing Energy Access for All Initiative, the Achieving Cooperative Community Equitable Solar Sources project and the Rural Energy Storage Deployment Project. DOE should continue to partner with NRECA and its members as it funds Rural or Remote energy projects.
- **Area Definition:** Each of NRECA's 831 distribution electric cooperative and public power district members serve on or more city, town or incorporated area that meets IJA's definition of rural or remote. In addition, 586 of NRECA's distribution members serve one or more rural or remote area located in census tracts considered disadvantaged for clean energy and energy efficiency. NRECA members provide service in 92% of the Persistent Poverty Counties.
- **Project Priorities:** Of the 6 potential types of projects identified by DOE, 100% of them have been deployed by NRECA distribution and/or G&T members. The most impactful type or types of projects will vary significantly depending on the unique situation in each community.
- **Potential Barriers:** Potential barriers include the perceived risk assumed by financial organizations, reaching and educating members, focus of existing federal support programs (e.g. LIHEAP) on relief of short-term energy burdens.
- **Equitable and Meaningful Community Involvement:** Electric cooperatives are community-based organizations. DOE should work proactively with NRECA and its members as key stakeholders. Communications and education efforts will be crucial. Existing electric cooperative membership communications, survey and opportunities such as annual meetings are recommended to encourage community involvement in proposed projects.
- **Project Size:** NRECA members are uniquely situated to scale projects appropriately. Project size will depend on, among other elements, electric load, demand and state of the local grid. A project scoped to serve a small rural or remote area might be relatively small however a distribution cooperative could use funding to produce multiple small microgrids across its territory or work in

partnership with other distribution cooperatives, a G&T and/or NRECA to aggregate these projects into one larger deployment.

- **Cost Share:** Fifty percent cost share could pose a barrier to participation by some NRECA members. We recommend that DOE lower the cost share to no more than 30%.
- **Application Process and Requirements:** NRECA recommends that DOE make the application process and requirements as simple and uniform as possible. DOE should avoid information collection that duplicates what other federal agencies already collect and should avoid program requirements that conflict with other federal programs. Cooperative have limited time and financial resources to dedicate to complicated application processes and onerous reporting requirements for successful applications.
- **Diversity, Equity and Inclusion:** NRECA expects to help its members applying to the rural or remote program to submit a DEI plan that clearly articulates how the project team is committed to fostering DIE through specific goals and milestones.
- **Positive Impacts from Projects:** The positive impacts from the types of projects anticipated include mitigation of natural disaster impacts, increased reliability, increased resilience, reduced emissions, increased energy efficiency, increased energy savings, local economic development, tax payments and workforce development, enhance involvement of disadvantaged consumer-members in their local electric cooperative.
- **Conclusion:** Electric cooperatives look forward to partnering with DOE on this important initiative. NRECA and its members have the knowledge and expertise to support robust planning and implementation of projects that will ensure federal dollars are expended efficiently, infrastructure is appropriately sized to account for current and planned energy needs, and reliability of the electric grid is maintained. Not-for-profit electric cooperatives are interested in applying for federal funding provided under this program so they can implement projects that might otherwise be cost-prohibitive and ensure that rural communities are not left out of realizing the benefits of these investments.