Comment from Solstice Initiative

Attached are comments from Solstice Initiative, a nonprofit that revolutionizes the energy system by centering climate-impacted communities through clean energy projects, policy advocacy, and education, for IRS Notice 2022-51.



Sent Via Electronic Mail

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November 4, 2022

Re: Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy Communities Requirements Under the Act Commonly Known as the Inflation Reduction Act of 2022, Notice 2022-51

.04 Energy Community Requirement

7) Please provide comments on any other topics relating to the energy community requirement that may require guidance.

We recommend that the definition of energy community be broadened to include communities that have especially high energy burdens (above 6%) and align with the Justice40 initiative to provide clean energy and climate change funding to disadvantaged communities, for these communities can most directly benefit from energy savings provided by local clean energy projects.¹ We also agree with Just Solutions collective that the Treasury should release a publicly accessible map that outlines what areas qualify as energy communities within their determined definition based on the most up to date data. Additionally, we agree that there should be a process for local community members to ask for their community to be added into the definition as data sources may be incomplete.

¹ "Justice40 Initiative." The White House. The United States Government, August 30, 2022. <u>https://www.whitehouse.gov/environmentaljustice/justice40/</u>.