

# Inclusive Community Solar Adder (ICSA)

## Frequently Asked Questions

Version 2.0, released August 26, 2021

Version 2.0 of the ICSA FAQs is intended to provide guidance to applicants in conjunction with the rules outlined in the [NY-Sun Program Manual](#). The answers in Version 2.0 supersede the ones in Version 1.0.

In the event of any discrepancies between the FAQs and the Program Manual, the Program Manual will be the controlling document. The FAQs will be updated periodically.

### 1. General

#	Question	Answer
1	<b>What resources will be made available that identify low-income, environmental justice, and disadvantaged communities?</b>	The <a href="#">Interim Disadvantaged Communities map</a> and <a href="#">its source data</a> are now available on the Data.Gov webpage. Developers can also use the <a href="#">map</a> on NYSERDA's website with an address lookup.
2	<b>Will NYSERDA allow contractors to propose areas that are not designated as a disadvantaged community but should be?</b>	No, contractors cannot propose areas that could be designated as disadvantaged communities just for this program. The criteria of what defines a disadvantaged community is overseen by the New York State Climate Justice Working Group – you can learn more about how the interim areas were designated <a href="#">here</a> .
3	<b>We were hoping to provide a sliding scale for solar power cost savings to LMI subscribers based on attested income level. It appears that there can only be a single solar power benefit for the entire project. Will an income-level based sliding scale be allowed?</b>	Yes, the scenario described in the question is allowed for the Adder. However, per the net crediting rules approved by the Public Service Commission, multiple discount rates are currently not allowed for projects that are using net crediting to bill their subscribers. If a project does not use net crediting, they may offer one discount rate for market rate customers, and another for ICSA-eligible residential subscribers.
4	<b>Can a project that offtakes 40% of its power to a single metered non-profit located in a disadvantaged community receive the ICSA?</b>	The ICSA requires the participating projects to allocate 20% of the project's capacity to eligible residential subscribers. Therefore, a project that offtakes 40% of its power to a single metered non-profit located in a disadvantaged community may be eligible to receive the ICSA provided that 20% of its capacity is allocated to residential subscribers and can receive the ICSA for 60% of the project's capacity.
5	<b>Can the ICSA be applied to already built projects?</b>	No, with the following exception: The ICSA can only apply to built projects that submitted Commercial Operation invoices between March 24, 2021 and

		July 20, 2021 and can demonstrate that all ICSA requirements were met at the time of Commercial Operation and Initial Subscriber Allocation.
<b>6</b>	<b>How will ICSA applications be reviewed and awarded? Is it first-come, first-served?</b>	<p>In anticipation of potential high initial demand for the ICSA, for applications received between program launch and August 31, 2021, NYSERDA will queue application review based on the date of full (75%) interconnection payment for the associated NY-Sun project, and applications will be funded in the order of full interconnection payment. Once all projects that have made full interconnection payments have been funded, remaining projects will be queued based on date of initial (25%) interconnection payments. Separate queues will be made as necessary for each project type. After August 31, 2021, applications will be reviewed in the order they are received until all available funding is fully committed.</p> <p>Information about how applications will be awarded can be found in the Program Manual. Please review the language in the Program Manual.</p> <p>ConEd Program Manual: Page 12</p> <p>Upstate + Long Island Program Manual: Page 14</p>
<b>7</b>	<b>If we apply for the ICSA and win the award, how long do we have to build the project and bring it to COD before we lose the award? What happens if the project never gets built due to situations beyond our control?</b>	<p>All ICSA-funded projects are subject to completion requirements of the NY-Sun C&amp;I program or Non-residential program, depending on which program the project falls under. If the project is not built to these requirements the ICSA award will be canceled. More information can be found in the Program Manual.</p> <p>ConEd Program Manual: Page 30</p> <p>Upstate + Long Island Program Manual: Page 35</p>

## 2. Subscriber Requirements

#	Question	Answer
1	<b>The program seems focused on low-income customers. How are moderate-income customers going to meet the income verification tests?</b>	The program is focused on low- and moderate-income customers, as well as the eligible non-residential subscriber types. However, verification options for moderate-income households are initially limited to: 1) individual income verification by NYSERDA, using the method currently used by the <a href="#">Affordable Solar (rooftop LMI) program</a> , 2) residence in a designated Interim DAC (with confirmation that customer meets LMI criteria), or 3) residence in a regulated affordable housing property limited to LMI households (see below). Developers may propose alternative methods of verification.
2	<b>If each resident within an affordable housing property pays their own electric bill, are they eligible? (If they are master metered, is the % of energy still eligible as LMI?)</b>	All LMI residential electric customers are eligible, regardless of residence type. Residents of affordable housing properties that are limited to LMI households may be considered eligible without additional verification, subject to pre-approval by NYSERDA.
3	<b>Is the LMI % just for the initial allocation? For example, if an LMI customer drops off the project because they move, that customer does not need to be replaced with another LMI customer?</b>	The eligible subscriber allocation is required for the entire time the project is receiving funding from the ICSA.
4	<b>What happens if we apply for an incentive but then we achieve an LMI target that is less than the proposed amount?</b>	<p>The ICSA payment will be paid on the actual capacity allocated to eligible subscribers, but the remaining “missing” portion of the target must remain unallocated in order to receive the incentive.</p> <p>Example: A 2MW Upstate project with no Community Credit or Community Adder proposed a subscriber target in the 40-60% range, but only achieved an eligible subscriber amount of 30%.</p> <ul style="list-style-type: none"> <li>- The project would only be paid for the actual capacity (30%) that it achieved. <math>(2,000,000 \text{ W} * \\$0.20/\text{W}) * 30\% = \\$120,000</math></li> <li>- The portion of the project that did not meet the expected target would need to remain unallocated, and the developer would need to provide proof of that prior to invoicing. In this example, that means 10% must remain</li> </ul>

		<p>unallocated and cannot be filled with non-ICSA subscribers.</p> <ul style="list-style-type: none"> <li>- If a developer would like to fill the unallocated portion with non-ICSA subscribers, they would need to work with NYSERDA to reduce their total award from 40-60% award amount down to 20-40% amount. This must be done prior to the Commercial Operation (first) incentive payment.</li> </ul> <p>If a developer wants to make up funding lost from the first payment, they can do that by significantly increasing LMI subscribership in years one and two. For example, if you fall below 20% prior to COD and miss the first payment, but then hit 40% for the second and third payments, your total payment will be the same as if you had been at 20% each year. But if you fall below 20% prior to COD and then hit 20% for the second and third payments, your total payment will be half as much as it would have been if the project had been at 20% throughout.</p>
5	<p><b>What happens if we achieve a target that is higher than what we proposed? Say we proposed 40-60% but we achieve 80%?</b></p>	<p>If you allocate more capacity than anticipated, the total payment is still subject to the maximum funding amount contracted. In the example you provided, (40-60% targeted, 80% achieved) you would receive a higher commercial operation payment (based on the 80%) but then a lower third payment as the maximum funding amount in the contract was reached.</p>
6	<p><b>What are “new” eligible subscribers? Can we take eligible subscribers from existing projects and add them to ICSA projects?</b></p>	<p>No. You cannot take eligible subscribers from existing projects and add them to ICSA-funded projects to meet the requirements of this program. By reallocating existing customers that are income-eligible into ICSA funded projects, you are not using the money for its intended purpose, which is to reach out to and subscribe new customers that have been historically underserved by the solar industry. This money is intended to support customer acquisition and marketing efforts for new eligible customers, increasing the number of LMI household and disadvantaged community members that are accessing solar and receiving the benefits from it.</p>

### 3. Customer Education

#	Question	Answer
1	<b>How is the ESCO issue going to be addressed?</b>	We recognize that customers are often confused about the difference between a community solar subscription and ESCO retail energy supply. Moreover, LMI customers have often had negative experiences with ESCOs that reduces interest in community solar. NYSERDA educational materials and community outreach will address these differences and educate customers on the safeguards put in place by the UBP-DERs, net crediting, and Inclusive Community Solar Adder program rules.

### 4. Eligible Subscriber Review and Verification Process

#	Question	Answer
1	<b>Can you clarify how projects should justify their targeted range of eligible subscribers for a project?</b>	NYSERDA will require that developers justify their selected subscriber target in the <a href="#">Marketing and Implementation Plan</a> for each project that is applying for the adder.
2	<b>Can contractors propose other pathways for income verification?</b>	At this time, NYSERDA does not have a formal process to propose other pathways for income verification. If you think you have a pathway that will comprehensively and accurately verify income that is different from one of the four pathways currently allowed you can email <a href="mailto:communitysolar@nyserda.ny.gov">communitysolar@nyserda.ny.gov</a> with the pathway. It may take upwards of 30 days for NYSERDA to review the pathway and confirm its use.
3	<b>Can NYSERDA confirm eligible subscribers on a case by case basis?</b>	NYSERDA can pre-approve subscriber lists as meeting the requirements of the ICSA. However, to keep administrative effort manageable we will limit pre-approval to no more than one review prior to a project's initial allocation. More information can be found in the ICSA documentation section of the Program Manual.  ConEd Program Manual: Page 29 Upstate + Long Island Program Manual: Page 34

4	<b>At what point in the process will a project need to submit its full list of customers to NYSERDA?</b>	<p>Utility-accepted subscriber allocation list and Host Summary Report for the list must be provided for invoicing. Only the Initial allocation (at CO) and allocation lists at the end of years 1 and 2 can be used for invoicing. For example, if a project's first month generating credits is in September 2021, the accepted lists/host summaries to be used for invoicing must be for Sept. 2021, Sept. 2022, and Sept. 2023.</p> <p>More information on how to invoice for the ICSA can be found in the Program Manual.</p> <p>ConEd Program Manual: Page 29 Upstate + Long Island Program Manual: Page 39</p>
5	<b>Can NYSERDA commit to a certain timeframe to complete the subscriber verification review process?</b>	<p>NYSERDA intends to review subscriber lists for pre-approval and invoicing within two weeks of submittal. This timeframe will be contingent on the submission of complete and correct documentation by the contractor, and may be subject to change given the total volume of submissions received at any given time.</p>
6	<b>What is the reporting requirement for projects that receive the ICSA?</b>	<p>Projects will be required to report at the same time they submit for invoicing: at COD, upon the first anniversary of project completion, and upon the second anniversary of project completion.</p> <p>All contractors must track the project's retention of eligible subscribers for two additional years beyond the third invoice payment, and must report retention information, to NYSERDA upon request. Please see the Program Manual for specifics.</p> <p>ConEd Program Manual: Page 29 Upstate + Long Island Program Manual: Page 33</p>
7	<b>Will NYSERDA provide a template self-attestation form?</b>	<p>A copy of the self-attestation form can be found on the <a href="#">Resource for Contractors</a> webpage in the "Inclusive Community Solar Adder Resources" section.</p>
8	<b>What additional eligibility qualifications need to be conducted (if any) regarding affordable housing tenants? Do the tenants also need to be</b>	<p>All residents of a regulated affordable housing property can be deemed eligible if the property 1) meets the eligibility requirements of the NY-Sun Multifamily Affordable Housing Adder, 2) residence is limited to LMI households (80% AMI or below),</p>

	<b>qualified per the rules for residential subscribers? If the affordable housing provider qualifies, are the tenants included in that qualification?</b>	and 3) participation in CDG will not result in increased costs (e.g., rent or common charge increase) for the residential subscriber due to the utility allowance mechanism or other policies or practices. Properties must be deemed qualified by NYSERDA prior to the submission of an ICSA invoice by the project.
9	<b>Is a developer locked into the method for confirming eligibility or can they use a mix?</b>	A mix of eligibility methods may be used, but the methods being used must be described in the application.
10	<b>Do we need to get new proof that a customer is LMI for the 1st and 2nd anniversary if they were included and documented previously as being LMI?</b>	No, you do not.
11	<b>What if the method of subscriber verification changes?</b>	If a contractor's subscriber method changes, you will need to notify NYSERDA, who may request a new Marketing and Implementation Plan for your updated marketing and customer acquisition strategy.
12	<b>In what circumstances is the Self-Attestation Form required?</b>	The Self-Attestation is required for the geo-eligibility method. Different documentation is needed for the categorical (HEAP letter, SNAP letter, etc.) and individual household (verification by NYSERDA) methods. Please see the program manual for specifics.  ConEd Program Manual: Page 12 Upstate + Long Island Program Manual: Page 14

## 5. Incentive

#	Question	Answer
1	<b>How will the total ICSA incentive for a project be calculated? (Is the incentive value multiplied by the eligible capacity?)</b>	<p>The total ICSA for a project is calculated by multiplying the project capacity dedicated to eligible subscribers by the per Watt adder incentive for the applicable project type.</p> <p>Example: A 2 MW upstate project with no Community Credit or Community Adder that meets 40% eligible subscribers would receive \$160,000.</p> <p>Calculation: <math>(2,000,000 \text{ W} * \\$0.20/\text{W}) * 40\% = \\$160,000</math></p> <p>The adder amounts are \$0.05/W for Upstate MTC/CC, \$0.10/W for Upstate CA, \$0.20/W for Upstate no CC or CA, and \$0.10/W for ConEd.</p>
2	<b>What can the ICSA be combined with? (Can the ICSA be combined with Con Edison's Community Credit, other Adders like the Affordable Housing Adder, etc.?)</b>	<p>Projects receiving the Community Credit and Community Adder are eligible. Projects receiving the brownfield or canopy adders are eligible. Projects receiving the Multifamily Affordable Housing Adder are not eligible (this is a much higher incentive level already).</p>
3	<b>Can new projects receive the ICSA Adder?</b>	<p>Projects are only eligible to apply for the ICSA adder if they are in Approved status (with the exception of projects that were completed between March 25, 2021 and July 20, 2021). New projects must first submit a NY-Sun MW Block incentive application and have that application approved by NYSERDA before applying for the ICSA for that project. Projects that have not received any MW block funding (i.e., Upstate Commercial/Industrial projects that did not receive MW block funding prior to the closure of that program) are eligible for the ICSA, provided they meet the maturity requirements. If you would like to submit an Upstate Commercial/Industrial project for the ICSA adder, you must first submit your project to NY-Sun. We will confirm the project meets the project maturity requirements and make an award with \$0 dollars in funding. You would then be able to submit an application for the ICSA.</p>
4	<b>What happens if a project fails to reach its targeted threshold of LMI</b>	<p>No, projects will not lose any other NYSERDA funding, such as the "base" NY-Sun MW Block incentive. Projects that fall below the minimum LMI</p>



	<b>subscribers? Will projects lose other NYSERDA funding?</b>	subscriber requirement (20% of capacity) at initial allocation will not receive any ICSA payment at commercial operation, but may receive adder payments at the first and second year project anniversaries if they subscribe enough additional eligible subscribers to meet the requirements.
5	<b>What happens if a project originally includes an eligible LMI customer but in the future that customer is no longer considered LMI (for example, because they get a new job and have a higher income)?</b>	Once a customer has been approved as eligible by NYSERDA, they will count toward the eligible capacity as long as they are in the project.
6	<b>Are there plans to add additional funds to the ICSA in the future?</b>	Additional program funding will be considered based on program uptake and performance.
7	<b>What will NYSERDA do if there are more applications for incentive funds than there are funds available?</b>	We recognize that due to the large NY-Sun pipeline and significant interest in the ICSA, demand for incentives may outstrip funding. In order to address this possibility and avoid a rush immediately upon program launch, there will be an initial 30-day launch window for the ICSA. If at the end of this period there are more eligible applications than can be funded, NYSERDA will queue all projects based on the date of full (75%) interconnection payment. Applications will be funded in the order of full interconnection payment. Once all projects that have made full interconnection payments have been funded, remaining projects will be queued based on date of initial (25%) interconnection payments. Separate queues will be made for each type of project (NEM-MTC-CC; CA; non-CA).
8	<b>Is there a cap on how much of the incentive you can qualify for on a given project? (For example, the Multifamily Affordable Housing Incentive under the NY-Sun program is only eligible for the first 200kW of the project. Is there a similar cap for the ICSA?)</b>	No, the ICSA can be applied to anywhere between 20% and 100% of a project.
9	<b>Will the incentive level be higher if the project is 100% residential vs. a mix of commercial and residential?</b>	No, the incentive amount will be the same.

10	<b>If a project would like to receive the full ICSA, do all the subscribers have to be LMI?</b>	Yes, all 100% of the subscribers on the project have to be ICSA-eligible subscribers in order to receive the full incentive amount. A minimum of 20% of those subscribers need to be residential subscribers.
11	<b>Can a project that receives indication of award that does not have NEM, MTC, CC or CA have to remain a CDG project or can it later change to a Remote Crediting project?</b>  <b>Will there be a penalty to the project owner if the project switches from CDG with ICSA to remote crediting (without the ICSA)?</b>	A project must remain a CDG Project to also receive the ICSA adder.  If a project switches from CDG with the ICSA to remote crediting, the ICSA award will be removed because it is only intended for community solar projects.
12	<b>Can you please give clarification on the payment structure of the ICSA? Will it be paid over 3 years?</b>	Yes, it is paid over three years. Please see the program manual for more details on the payment structure.  ConEd Program Manual: Page 28-29 Upstate + Long Island Program Manual: Page 33-34
13	<b>Can a developer transfer the Adder from one project to another?</b>	No.

## 6. Environmental Justice Incentive

#	Question	Answer
1	<b>What projects are eligible for the bonus environmental justice incentive? (What maps will be used to identify the environmental justice communities eligible for the bonus incentive?)</b>	<p>The Bonus EJ Incentive is for projects that are located in and benefit environmental justice communities impacted by pollution from power generation.</p> <p>Projects must be sited within the "preferred load areas" designated by ConEd for the <a href="#">2019 Bulk Energy Storage RFP Appendix E</a>. Demand reduction in these areas is projected to provide distribution and transmission relief, as well as emissions reductions from peaker power plants.</p> <p>Projects must also be sited within a <a href="#">DEC Potential Environmental Justice Area</a>.</p> <p>The project must dedicate at least 40% of its capacity to eligible subscribers within the same or adjacent zip code. The project Implementation Plan must include close partnership(s) with local community organizations and stakeholders throughout the project development process; including siting, construction, and customer outreach. Finally, the project must provide additional community benefits beyond cost savings to subscribers. Please see the Program Manual for more information.</p> <p>ConEd Program Manual: Page 11</p>
2	<b>What is the amount of the bonus environmental justice incentive?</b>	The bonus incentive is an extra \$.10/W, so the total ICESA for qualifying projects would be \$.20/W for eligible subscribers.
3	<b>Is the bonus environmental justice incentive only for Con Edison?</b>	<p>The bonus is only available in specific areas within the ConEd service territory. Please see the Program Manual for more information.</p> <p>ConEd Program Manual: Page 11</p>
4	<b>Will the bonus environmental justice incentive apply to brownfield and landfill sites?</b>	Yes, projects may receive both the ICESA EJ incentive as well as the Brownfield/Landfill adder.
5	<b>Do you have information on what is defined as 'surrounding community'?</b>	In the same or adjacent zip code.

## 7. Applying for the ICSA

#	Question	Answer
1	<b>How do I apply for the ICSA? (When?)</b>	A project can apply for the adder at any time prior to the project submitting their NY-Sun Commercial Operation payment, using the same application portal that is used for the MW Block Program.
2	<b>What entities are allowed to apply for the ICSA (developers, community groups, TA providers, etc.)?</b>	The applicant must be a NY-Sun Participating Contractor. Any Full Assignment and/or Payee Assignment will be inclusive of the requirements and payments for the ICSA.
3	<b>Can projects be in the program as a form of LMI verification and not receive funding?</b>	Yes, if funding is no longer available for a specific type of project, a project developer may choose to have their project approved as meeting the requirements of the ICSA.
4	<b>If you e-sign the application, do you need to upload the signed application on the documents page?</b>	If you have a payee that is not the contractor, we would recommend using the "print" function within the application portal.
5	<b>How will NYSERDA verify the 75% interconnection payment date? Is anything expected from the utilities?</b>	Contractors are required to show proof of 75% confirmation from the utilities along with the executed interconnection agreement 180 days from the date they made their 25% payment. These rules are consistent with NY-Sun program rules. NYSERDA requires written confirmation from the utility that the payment has been received.