Leveraging Energy Incentives in Affordable Housing

HOUSING CREDIT CONNECT

NCSHA 50 YEARS

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Accessing the IRA Greenhouse Gas Reduction Fund and Home Energy Rebates for Affordable Housing

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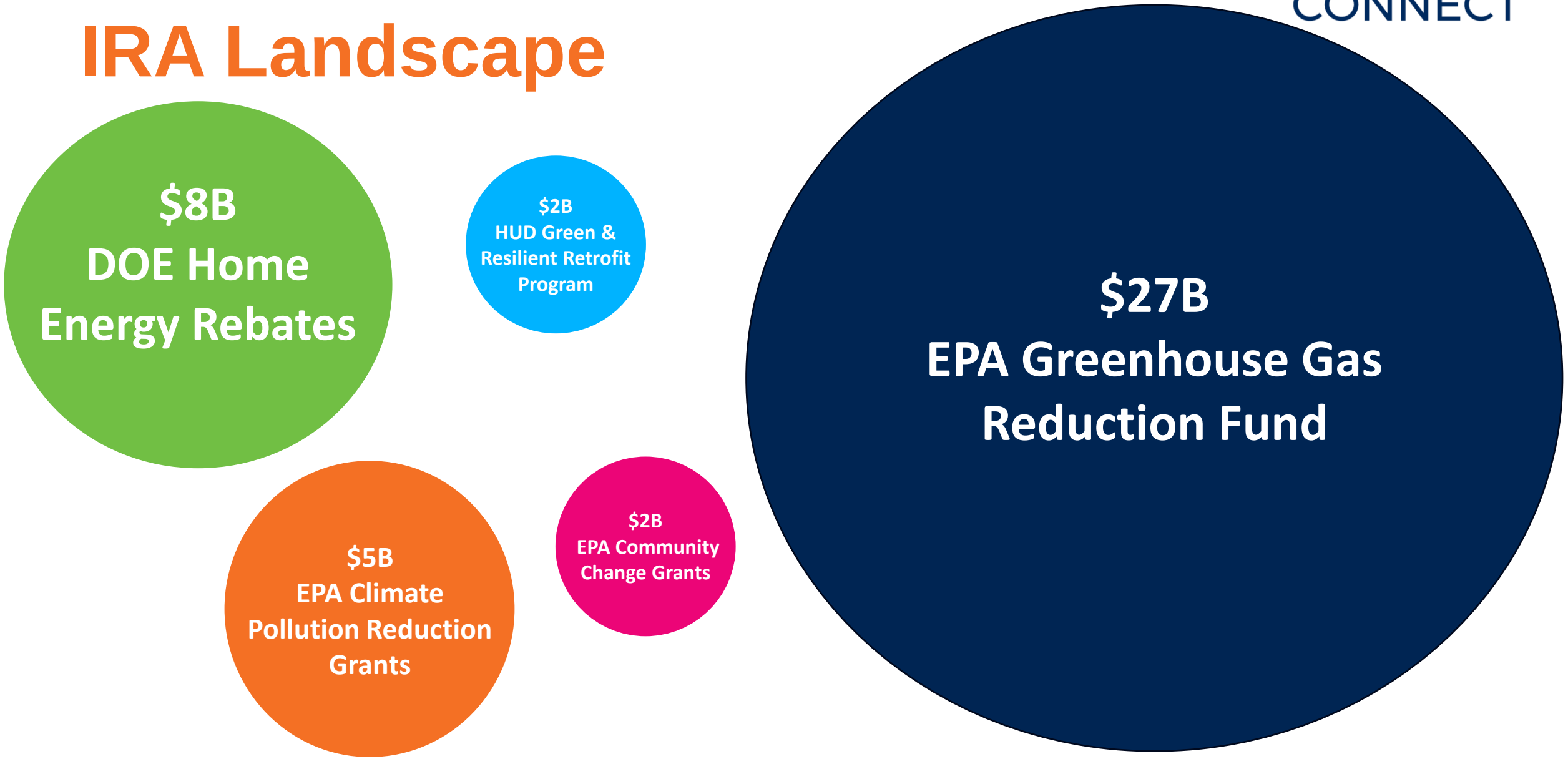
IRA Landscape



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What is the Greenhouse Gas Reduction Fund (GGRF)?

National Clean Investment Fund (NCIF)	Clean Communities Investment Accelerator (CCIA)	Solar for All (SFA)
$14 BILLION	**$6 BILLION**	**$7 BILLION**
3 AWARDEES will…	**5 AWARDEES will…**	**60 AWARDEES will…**
deliver accessible, affordable financing for clean technology projects nationwide partner with private-sector investors, developers, and community organizations to deploy projects, mobilize private capital at scale	provide funding and technical assistance to community lenders working in LIDAC communities to deploy clean energy projects build the capacity of hundreds of community lenders to finance projects for years	create new or expand existing low-income solar programs, which will enable over 900,000 households in low-income and disadvantaged communities to benefit from distributed solar energy

What types of projects are eligible for GGRF funding?

NCIF and CCIA

QUALIFIED PROJECTS
Must meet all criteria

- Reduces GHG emissions
- Reduces or avoids emissions of other air pollutants
- Delivers additional benefits to American communities
- Finances a project that may not otherwise have been financed
- Mobilizes private capital
- Supports only commercial technologies

PRIORITY CATEGORIES

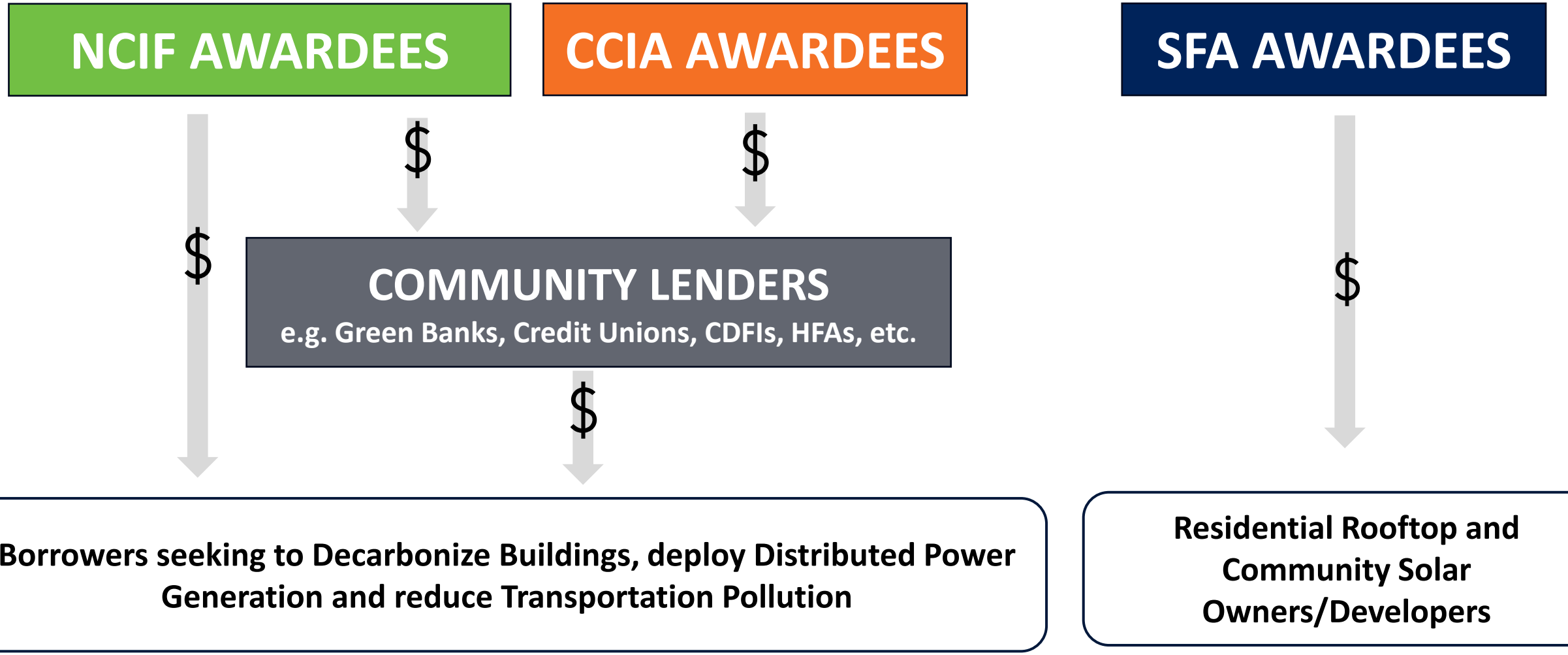
- Distributed energy generation and storage projects up to 10 MW
- Zero-emissions buildings
- Zero-emissions transportation

SOLAR FOR ALL

ELIGIBLE PROJECTS

- Residential rooftop solar
- Residential-serving community solar (up to 5 MW)
- Deliver 20% household savings
- Associated storage
- Enabling upgrades

How does GGRF funding flow to Qualified Projects?



Who are the NCIF awardees?

CLIMATE UNITED	CGC Coalition for Green Capital	POWER FORWARD COMMUNITIES
$6.97B	**$5.0B**	**$2.0B**
Calvert Impact, Self-Help, Community Preservation Corporation	**Coalition for Green Capital**	**Enterprise Community Partners, Rewiring America, Habitat for Humanity, LISC, United Way**
Work with first mortgage lenders to offer a lower cost, higher leverage debt product that would require an owner to decarbonize their building	Leverage the national network of green banks as a key distribution channel for investment	Provide customized and affordable capital solutions for single-family and multifamily owners/developers
At least 60% of investments in low-income communities	*At least 50% of investments in low-income communities*	*At least 75% of investments in low-income communities*

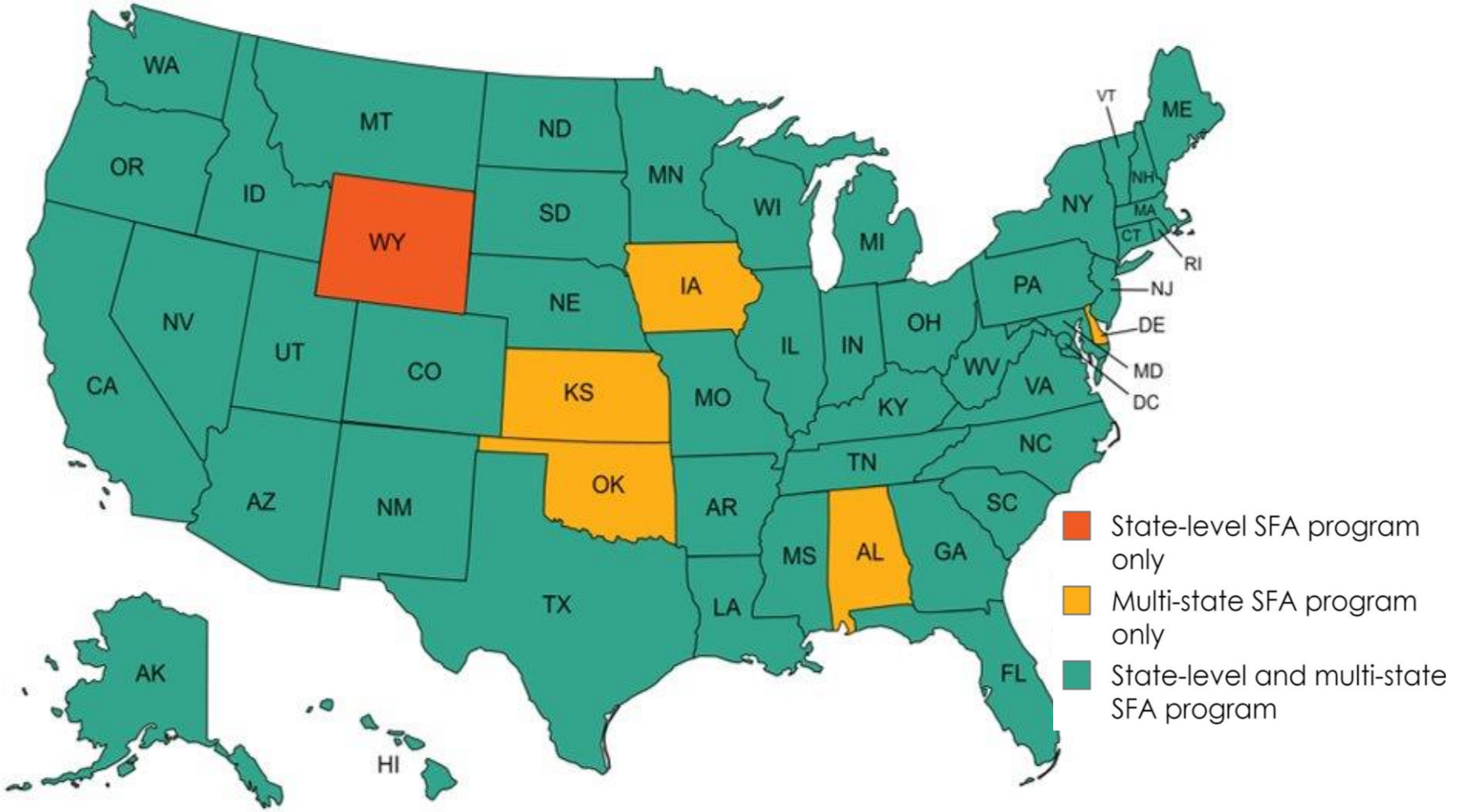
Who are the CCIA awardees?

Opportunity Finance Network	inclusiv	Justice Climate Fund	Appalachian Community Capital	Native CDFI Network
$2.29B	**$1.87B**	**$940M**	**$500M**	**$400M**
Provide **capital and technical assistance to CDFIs** so that they can invest and reinvest in eligible projects	Deliver **capitalization funding, coupled with technical assistance, to credit unions**	Stand up a **Community-Based Green Lender Certification Program** to assess, train, and certify community lenders	Launch the **Green Bank for Rural America** to deliver investments in coal, energy, and underserved rural and Tribal communities	Provide **capital and technical support to 63 community lenders to enable financing** for projects in Native communities nationwide

Who are the Solar for All awardees?

EPA made 60 conditional awards to state-level, Tribal, and multi-state nonprofit applicants covering all 50 states, D.C., Puerto Rico, and territories.

- **49 state-level awards** (incl. DC and territories) to state government agencies and/or state-level nonprofits **totaling $5.5 billion**
- **6 awards to Tribes** totaling **$500 million**
- **5 awards to nonprofits** that will implement multi-state programs **totaling $1 billion**



How much GGRF funding is likely to go to each type of priority project?

Net Zero Energy Buildings

~37% or $10B

Zero-emissions transportation

~11% or $3B

Distributed energy generation and storage

~41% or $11B

Other, e.g., Agriculture, Industry, etc.

~11% or $3B

Based on commitments made in awardee applications and adjusted for the amount of partial funding received relative to the initial funding requested.

CLIMATE UNITED Multifamily Technical Requirements

	ENERGY PERFORMANCE	ELECTRIFICATION	RENEWABLE ENERGY
	Retrofits of Existing Buildings		
Save a Ton	20% Energy Reduction OR 1 Ton Carbon reduction per unit annually	N/A	N/A
Clean Air	35% Energy Reduction OR Certified Energy Star Score of 75+	All-Electric	N/A
	New Construction		
Clean Air Boost	At least 10% lower modeled energy use than the latest model energy code OR Certified Energy Star Score of 90+	All-Electric	Powered solely by renewable energy

Based on current knowledge of the program parameters. We do not have final terms and we are continually receiving updated guidance, so all information is subject to change.

How could GGRF be used to decarbonize affordable multifamily housing?

CLEANING AIR AND REDUCING ENERGY COSTS FOR RESIDENTS

A to-be-constructed affordable low-income housing tax credit (LIHTC) deal is currently planned to be constructed with fossil fuel-based heating and cooling. Through a state Housing Finance Agency (HFA) or local lender, Coalition Partner CPC Climate Capital would be able to offer subordinate low-cost debt to offset the higher cost of all-electric construction with renewable energy and no combustion on-site. This would allow the building to save on energy costs and reduce indoor air pollution for residents.

Source: Climate United

How are Solar for All awardees planning to deploy funding?

- **Key Stats**
  - 90% plan to fund residential rooftop solar
  - 88% plan to fund the deployment of residential-serving community and shared solar
  - 78% plan to fund storage solutions to increase the resiliency of vulnerable communities
- **Sample State Multifamily Strategies**
  - **Connecticut** will focus primarily on multifamily affordable housing, offering revolving loan funds, solar-plus-storage lease or power purchase agreements, and green bonds with credit enhancements.
  - **Maryland** will offer multifamily projects low-cost bridge loan funding to help with cash flow during project construction. Funding will also be used to offset 20% of project costs for roof, electrical, and energy efficiency upgrades.
  - **Minnesota's** plan includes forgivable loans for multifamily projects. Funding will also be integrated into the state's HFA programs that support property improvements such as weatherization and efficiency work.

What is the GGRF Implementation Timeline?

- **Awardees Announced**
  - Spring 2024
- **EPA/Awardee Agreements Finalized**
  - Summer 2024
- **Initial Programs Launched**
  - Fall 2024
- **Funding Must be Disbursed**
  - Solar for All: Summer 2029
  - CCIA: Summer 2030
  - NCIF: Summer 2031

What incentives are available through DOE's Home Energy Rebate program?

The following rebates are available for **single-family homes** with household income **below 80% AMI** and in **multifamily buildings** where **at least 50% of households** have incomes **below 80% AMI**

Rebate Type	Rebate Amount

Home Efficiency Rebates (HER)	• Retrofits of existing buildings
	• Rebate level varies depending on the level of efficiency improvements, not to exceed:
	  • **$4,000** per housing unit for energy savings of 20%-34%
	  • **$8,000** per housing unit for energy savings of 35% or more
	  • Up to 80% of project costs

Home Electrification and Appliance Rebates (HEAR)	• New construction and retrofits • Appliance-based rebates with caps • 100% of project costs not to exceed the max rebate level of **$14,000 per housing unit**

How are states planning to implement multifamily rebate strategies?

- **Maine** plans to prioritize **50% of HER funds** for larger multifamily buildings that are electrifying their heating systems, benefiting approximately 2,250 units. Maine also plans to allocate **30% of HEAR funds** to new construction multifamily and manufactured housing, with approximately 1,700 households benefiting from this program.

- **Massachusetts** plans to **expand existing affordable housing decarbonization programs** by funding additional measures, targeting decarbonization in existing income-restricted multifamily units, leveraging multiple funding sources outside of HER, and exceeding max rebate limits to achieve greater energy savings for low-income units.

- **Oregon** plans to allocate **60% of HEAR program funding to low-income households and 20% of HEAR funding to low-income multifamily households**. The state's HER application also **increases maximum eligible project costs for 80% AMI households** to $8,000 if achieving at least 20% energy savings and $10,000 if achieving at least 35% energy savings.

How can states optimize Home Energy Rebates for affordable housing?

- **Increase the proportion of funding reserved for low-income/ low-income MF HHs**
  - **40%** of each state's funds ***must*** be allocated to *low-income households*. An additional **10%** ***must*** be allocated to *low-income multifamily households*

- **Implement higher Home Efficiency Rebate levels for low-income households**? E.g.:
  - $8K instead of $4K per unit for energy savings of 20%-34%; Cover up to 100% of costs

- **Allow for longer rebate reservation periods and include rebates in underwriting**
  - Provide certainty that rebates will be available upon construction completion

- **Allow rebates for central system/common area upgrades**

- **State Energy Offices should coordinate closely with state housing agencies to align the Home Efficiency Rebates so that they can work effectively for multifamily project finance.**

How can Home Efficiency Rebates be coordinated with LIHTC?

Eligible rebate recipient May be any member of a tax credit partnership, with the consent of the other members	**State Energy Office or Designated Subgrantee**
1. Applies for rebate reservation, using the modeled pathway	2. Issues a rebate reservation letter if the model is approved and demonstrates at least a 20% energy savings
3. Closes on construction financing, including the cost of the work to be funded by the rebates	
4. After improvements are complete, submits post-construction information to claim rebate funds	5. Processes the request and remits rebate funds within four weeks to the eligible rebate recipient
6. Loans or grants rebate funds to the tax credit partnership to take out a portion of the construction loan prior to conversion to permanent financing	

Source: DOE, "Home Efficiency Rebates (IRA Section 50121) Case Study: Using Whole Home Energy Rebates to Preserve Affordable Multifamily Housing"

What is the Home Energy Rebate Implementation Timeline?

- **Deadline for states to affirm they will apply for Home Energy Rebate funding**
  - August 16, 2024
- **Deadline for states to apply for funding**
  - January 31, 2025
- **Funding available to the public**
  - Rolling basis as DOE approves state plans
- **Deadline for states to expend funds**
  - September 2031

How does IRA support HFA sustainability goals?

- **23 HFAs require/incentivize whole-building energy performance standards**
  - GGRF and Home Energy Rebates
- **23 HFAs encourage renewable energy**
  - GGRF
- **9 HFAs require/incentivize high-efficiency all electric construction**
  - GGRF and Home Energy Rebates
- **9 HFAs incentivize EV infrastructure**
  - GGRF

NHT QAP Analysis: https://nationalhousingtrust.org/strengthening-low-income-housing-tax-credit-allocations

How to prepare for IRA funding?

- **Contact GGRF awardees and State Energy Office (SEO) to get more information about program plans**
  - Weigh-in w/ SEO on rebate program design
- **Begin to identify potential pipeline projects**
  - Consider GGRF will likely require Davis Bacon (and potentially BABA); Home Energy Rebates does not require Davis Bacon or BABA
- **Research state/local programs to stack funding**
- **Identify technical resources to support project development, e.g., energy auditing/ modeling providers, etc.**

For More Information

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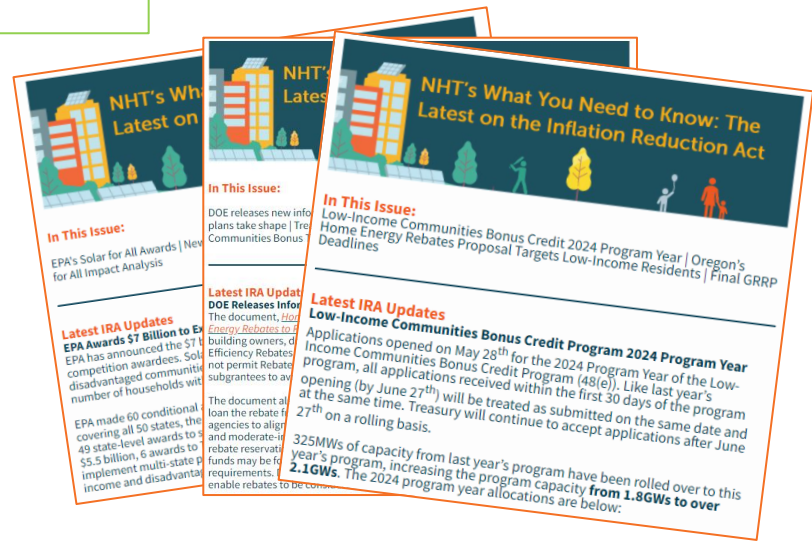
Sign up for NHT's IRA newsletter!



June 2024

Inflation Reduction Act Clean Energy Credits

Ellen Lurie Hoffman

Disclaimers

- This deck provides an overview of certain Inflation Reduction Act tax provisions for general informational purposes only and is not itself tax guidance.
- The content in this presentation is based on proposed and temporary regulations and other tax guidance on IRS.gov.
- This deck relies on simplifications and generalizations to convey high-level points about Inflation Reduction Act tax provisions. Please refer to guidance issued by the IRS for detailed information on the rules associated with Inflation Reduction Act tax provisions.
- Treasury and the IRS will carefully consider feedback submitted during the public comment periods for proposed regulations before issuing final rules.

Introduction: The Inflation Reduction Act

- The Inflation Reduction Act (IRA) makes the **largest investment in clean energy** in United States history, and much of that investment is **delivered via tax incentives**.
- The Treasury Department is the federal agency responsible for **administering the tax code** and is **proud to be playing a central role** in implementing the Inflation Reduction Act's clean energy tax incentives.
- The Inflation Reduction Act includes **tax incentives for a broad range of activities that support building a clean energy economy**, as well as **certain cross-cutting provisions and bonuses** that apply to multiple incentives.

IRA Tax Credits Overview

IRA created or modified 20 clean energy-related tax incentives, including:

- **Production tax credits** for clean energy generation, manufacturing, fuels
- **Investment tax credits** for renewable energy property and clean energy generating property
- Credits for **clean vehicles** and clean vehicle infrastructure
- Incentives for **energy efficiency**

Some of these credits are enhanced by bonus provisions:

- Prevailing wage and apprenticeship
- Energy communities
- Domestic content
- Low-income communities bonus

IRA also established two novel credit monetization provisions:

- **Elective pay (AKA "direct pay")**: Allows tax-exempt organizations and governmental entities to claim 12 "applicable credits" as direct payments
- **Transferability**: Allows taxpayers not eligible for direct pay to sell 11 "eligible credits" to other taxpayers who can use the credits.

Eligible Credits: Elective Pay and Transferability

Tax Provision	Elective Pay	Transferability
Production Tax Credit for Electricity from Renewables (§ 45, *pre-2025*)	✓	✓
Clean Electricity Production Tax Credit (§ 45Y, *2025 onwards*)	✓	✓
Investment Tax Credit for Energy Property (§ 48, *pre-2025*)	✓	✓
Clean Electricity Investment Tax Credit (§ 48E, *2025 onwards*)	✓	✓
Zero-Emission Nuclear Power Production Credit (§ 45U)	✓	✓
Credit for Qualified Commercial Clean Vehicles (§ 45W)	✓	
Alternative Fuel Vehicle Refueling Property Credit (§ 30C)	✓ *(if depreciable property)*	✓

Eligible Credits: Elective Pay and Transferability

Tax Provision	Elective Pay	Transferability
Clean Fuel Production Credit (§ 45Z, *2025 onwards*)	✓	✓
Credit For Production Of Clean Hydrogen (§ 45V)	✓ *(incl. businesses for five years)*	✓
Credit for Carbon Oxide Sequestration (§ 45Q)	✓ *(incl. businesses for five years)*	✓
Advanced Manufacturing Production Credit (§ 45X)	✓ *(incl. businesses for five years)*	✓
Advanced Energy Project Credit (§ 48C) *Application required*	✓	✓

Incentives for Energy Efficiency

Tax Provision	Description
Energy Efficient Home Improvement Credit (§ 25C)	**For energy efficiency improvements of residential homes by homeowners** (and in some cases renters).
Residential Clean Energy Credit (§ 25D)	**For the purchase of certain residential clean energy equipment** (including battery storage with capacity >= 3 kWh) by homeowners or renters.
New Energy Efficient Home Credit (§ 45L)	**For construction and sale/lease of new energy-efficient homes.**
Energy Efficient Commercial Buildings Deduction (§ 179D)	**For energy efficiency improvements to commercial buildings** (building owners, long-term lessees, or designers that have been allocated the deduction by certain tax-exempt building owners are eligible).

Not eligible for elective pay

Leveraging Energy Incentives in Affordable Housing

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What are the Incentives?

- Section 48 Investment Tax Credit – solar, wind (by election), geothermal, energy storage and many more types of equipment
  - Generally 30% of cost of systems less than 1MWh
  - Adders – Domestic Content, Energy Community, Low Income Communities
- Section 48E – Clean energy investment credit – like Section 48
  - Placed in service after 2024
  - Zero greenhouse gas emissions
- Section 45L –
  - Energy Star $500/$2,500 (w/Prevailing Wage & Apprenticeship) per unit
  - Zero Energy Ready $1,000/$5,000 (w/Prevailing Wage & Apprenticeship) per unit

Other things to know

- Section 48 credit
  - Credits can be sold to unrelated parties
  - Tax-exempt owners can receive a tax refund in lieu of a credit
  - Depreciable basis reduced by ½ credit and LIHTC eligible basis is NOT reduced
  - Tax exempt bond financing may reduce the credit
- No eligible basis reduction for Section 48E or 45L credits
- GGRF & GRRP – loans to avoid grant income & eligible basis reduction
- Know the additional requirements like prevailing wage & apprenticeship, domestic content, record keeping & reporting – every program is different

IRA Programs: Practitioner Perspectives

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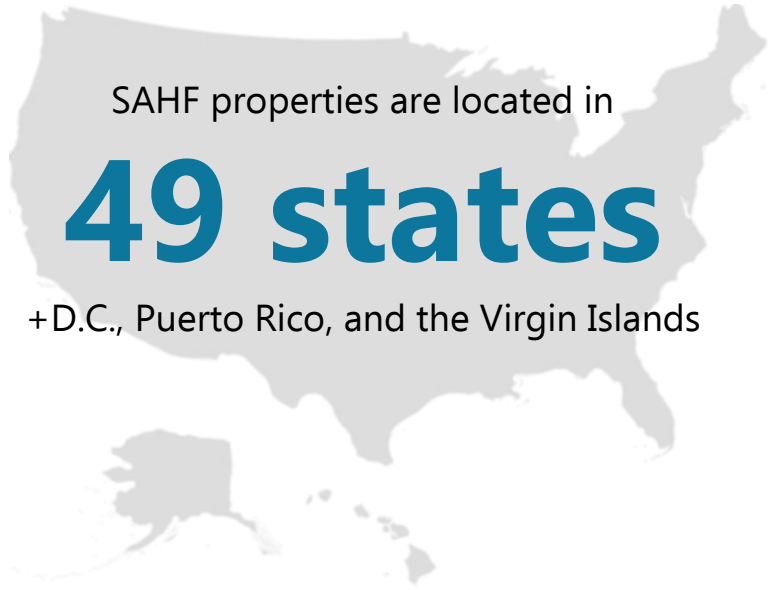
SAHF by the Numbers

230,000+

People Served by SAHF Members

12

Non-Profit
Housing Providers



SAHF properties are located in

49 states

+D.C., Puerto Rico, and the Virgin Islands

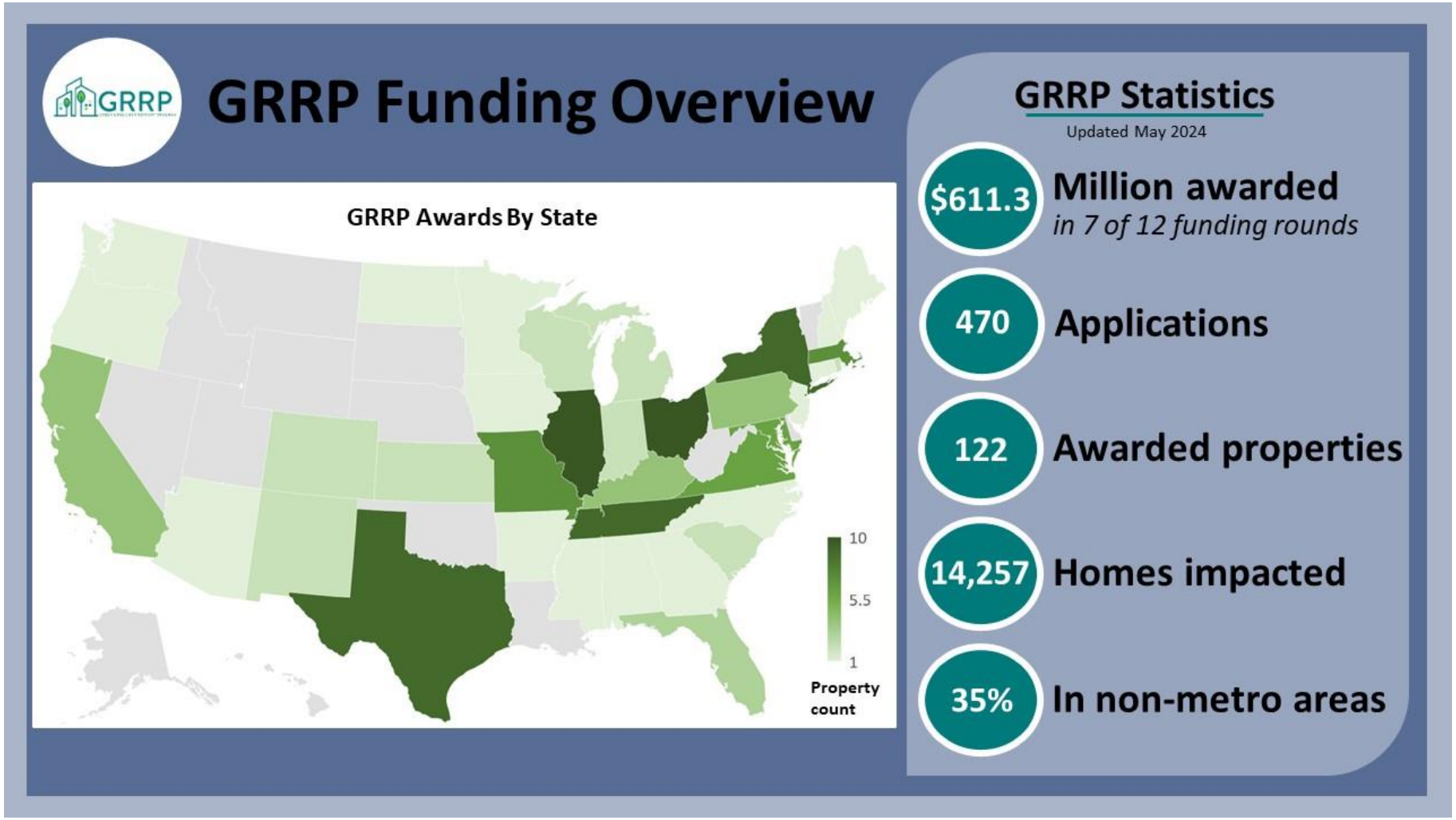
149,000+

Rental Homes for Families, Seniors, and Special Needs Populations

1,950

Multifamily Properties Across the U.S.

HUD Green & Resilient Retrofit Program



HUD Green & Resilient Retrofit Program

The Elements	The Leading Edge	The Comprehensive
Maximum award: $750k **per property.** $40k per unit.	Maximum award: $10M per property. $60k per unit.	Maximum award: $20M per property. $80k per unit cap.
Modest investment for **early-stage planned recapitalization projects.**	More significant investment for **early-stage planned recapitalization projects. Does not require extensive collaboration with HUD.**	Investment to **initiate a recapitalization project.** Projects can be standalone or part of a larger recapitalization and will require **signification collaboration** with HUD and contractor, who will drive the scope of work.
Allow for upgrades or additions of greener or more resilient building components and systems to existing SOW.	Allow for ambitious upgrades that move towards net zero, resilience. Properties must **demonstrate at least 25% energy reduction. Requires green building certification.**	Allow for ambitious upgrades that move towards net zero, resilience. Properties must **demonstrate at least 25% energy reduction. Expect to achieve 40%+ in emissions reductions**
Example applicant: The recapitalization project will replace the in-unit HVAC systems with higher-efficiency electric HVAC systems.	Example applicant: An experienced property owner is ready to move forward with Passive House certification financed by another funding source (e.g. LIHTC).	Example applicant: The property has high REAC scores and low capital needs, but is using older equipment dependent on fossil fuel sources. It is in an area of wildfire risk.

HUD GRRP Elements Project

- Community Manor, Cincinnati, OH
- 19 units in the Over-the-Rhine Neighborhood of Cincinnati
- $750,000 Award Round 1 HUD GRRP Elements
- Will fund air sealing work, new plumbing fixtures, and in-unit conversion from gas fired furnaces to air-source heat pumps
- Required plumbing calculations to indicate 25% water usage reduction
- Transfer of HAP assignment in June 23 was evidence of our recapitalization
- CNA was up to date
- Utilized existing HEROS submission

HUD GRRP Leading Edge Project

- Kindlewood, Charlottesville, VA.
- Funding Phase 2 of a 4-phase redevelopment of a 150-unit Project Based Section 8 community from the 1970s into a new 450-unit community. In partnership with Piedmont Housing Alliance.
- $6 Million Award - Surplus Cash Loan

- Enterprise Green Communities Plus 2020 (and DOE Zero Energy Ready) certification with Criterion 5.4 Achieving Zero Energy
- New Construction Scope of Work
- All-electric and powered with 100% renewable energy from both on-site and off-site renewable energy systems
- Energy and water efficient
- Improve climate resilience

What made this project a good candidate?

- Funding gap due to high construction costs
- Similar scope planned, except for the required 100% renewable energy

HUD GRRP & Residents

- Requirements for resident engagement:
  - Meetings
  - Informational resources post-retrofit
- Applicable to other Inflation Reduction Act programs, and likely needed
- Resource: Community Housing Partners: Centering Residents in Building Decisions Case Study

THE COMPONENTS OF A RESIDENT-CENTERED PROCESS

Deep resident engagement is a shift from housing providers telling residents what will be implemented in a building upgrade to providers creating intentional ways to involve and collaborate with residents. This enables residents to be valued partners in the decisions that impact their homes and to deepen their understanding of new systems and the benefits available to them. It can also be an opportunity to create homes that better meet residents' needs and to refine existing decision-making processes for future projects. CHP's process is documented below.

- **Dedicated Staff** - From the start, CHP made the decision to allocate significant staff time for deep resident engagement prior to having funding on hand. The project was designed as an integrated effort involving its asset management, property management, and corporate development teams.
- **Early Expectation Setting** - The secured financing set boundaries on what CHP could realistically do as the housing provider, but CHP also included some flexibility in its survey and communications to allow for new considerations.
- **Resident-centered Survey** - Once the financing was secured, survey questions were designed to solicit meaningful feedback on existing systems and features in all residential units from the population served (working families). CHP also determined how best to compensate residents who took time out of their busy lives to provide valuable feedback.
- **Multiple Methods to Give Feedback** - In addition to the online survey, CHP provided residents with multiple ways to participate in the process through phone survey, printed survey, and in-person appointments.
- **Increased Transparency** - CHP created a website for residents to learn more about more about the renovations, view renderings and a model unit, and submit additional questions. Staff also used door tags, virtual and in-person unit tours, and in-person visits to keep residents up-to-date, follow up on responses, and address any new issues.

Door Tag for Cedar Crest Outreach

RESIDENT EXPERIENCE

"I feel like the renovation process was fast, and they did a good job. I do like everything, especially the kitchen because I am a cook. I have more space with the cabinets, and I enjoy the countertops and the new floor. The renovations came out really nice. Everything worked out in a timely fashion. The staff let me know they would be coming, and I was able to get ready in time. It looks nice, and I like it!"

-Bernell P., Cedar Crest resident for two years

For more photos from the Cedar Crest renovation, please visit Community Housing Partners' website.

KEY TAKEAWAYS FROM COVID-19

The pandemic presented an opportunity to learn how to implement sensitive community engagement and rehabilitation practices. CHP will carry these implementation lessons forward to future projects:

Start the Process Early

CHP's resident engagement started after they secured financing for the renovation. Being further along in the planning process limited the scope of work. For future projects, CHP will engage residents at the start of the process, so they may secure funds to act on other resident considerations (e.g., community spaces).

Create More Spaces for Community Dialogue

Due to the pandemic, CHP relied heavily on surveys and other socially-distanced communication methods. This multi-channel approach resulted in responses from nearly ***50% of Cedar Crest households***. Although CHP compensated residents for their involvement, there was still the other 50% they did not hear from. CHP plans to dedicate more staff time to focus groups (virtual and in person) and door-to-door outreach as well as utilizing more open-ended questions to gain greater insight into what residents would like to see in their community.

Meet Residents Where They Are

To be responsive to residents' needs, CHP limited rehab work to a maximum of two units at a time. Although the team prepared buildings and hospitality rooms with internet and other amenities, most residents preferred to stay in their homes during construction. Being sensitive to resident needs meant managing expectations as a staff member. Ongoing communications and flexibility from a trusted staff member like a property manager contributed to positive feedback from most residents. Negative feedback may have been avoided and other alternatives developed through earlier communications.

STEWARDS OF AFFORDABLE HOUSING FOR THE FUTURE
www.sahfnet.org / contact@sahfnet.org
1120 G Street NW, Suite 800, Washington, DC 20005

Energy Benchmarking

Basics & Cost

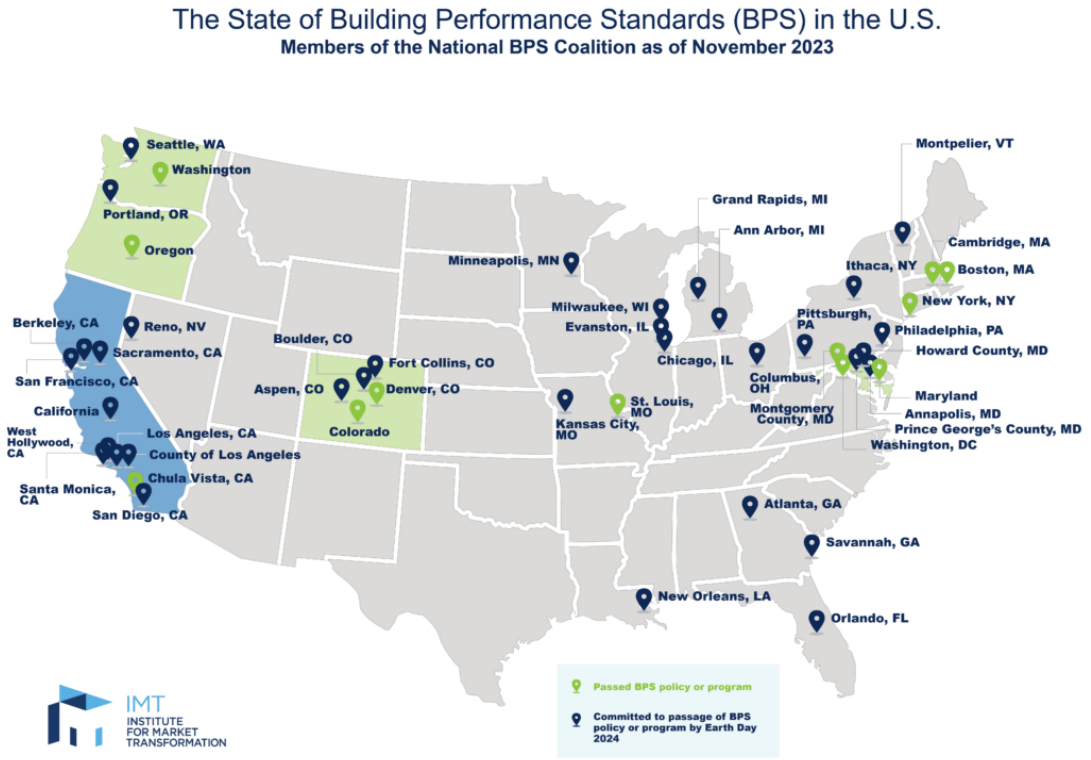
- Required for HUD GRRP, and likely for several other IRA programs, some green building certification programs, Fannie Mae green rewards
- Many portfolio owners use third-party services for tracking. Costs vary.
- Some utilities charge for data - $75 per property up to $400 per building
- Some local jurisdictions require third-party data verification (additional cost)
- Larger portfolios typically require internal capacity to manage data

Resources

- ENERGY STAR Portfolio Manager: free platform managed by EPA
- HUD Energy Benchmarking – free third-party services
- DOE/HUD partnership for Better Buildings Challenge – TA, incentives, resources

Building Performance Standards

- First comes **energy & water benchmarking**, then comes **building performance standards**
- Federal Definition: *A Building Performance Standard (BPS) is an outcome-based policy and law aimed at reducing the carbon impact of the built environment by requiring existing buildings to meet energy- or GHG emissions-based performance targets.*
- National Building Performance Standards Coalition: launched by the Biden administration, this nationwide group of **state and local governments** are committed to inclusively design and **implement building performance policies and programs**



National Zero Emission Building Definition

At a minimum, a building that achieves zero operational emissions from energy use must be:

1. Energy efficient
    1. The building obtains an **ENERGY STAR score of 75** or higher
    2. If the building is ineligible for an ENERGY STAR score, the whole **building's site energy use intensity (EUI) is at least 35% better than the median EUI**
    3. The whole building's EUI is less than the EUI specified in the latest version of ANSI/ASHRAE/IES Standard 100
2. Free of on-site emissions from energy use, meaning no fossil fuels. There is an exception for emergency generators.
3. Powered solely from clean energy.

Third-party home energy certifications and the national zero emissions building definition, explained

Type of home	EFFICIENCY How much less energy do certified homes use than "built-to-code" homes (2021 IECC)?	ON-SITE EMISSIONS Are homes required to be all-electric?	ELECTRICITY EMISSIONS Are homes required to use only clean electricity?
Meets national zero emissions building definition	**10%**	**Yes**	**Yes**
Phius CORE	40%+	Yes	Encouraged but not required
Phius ZERO	40%+	Yes	Yes
LEED Zero Energy	Reduced energy use encouraged but not required	No	No, but must purchase RECs
LEED Zero Carbon	Reduced energy use encouraged but not required	No	No, but must purchase RECs
ILFI Zero Energy	Reduced energy use encouraged but not required	Yes	Yes, and must be additional
ILFI Zero Carbon	20%	Yes	Yes, and must be additional
Enterprise Green Communities Plus	30%	Encouraged but not required	No, but must be solar-ready

Table: RMI • **Source:** Phius, LEED, ILFI, Enterprise Green Communities

Communication & Planning is Key

- Talk with your state energy office about DOE rebates
- You can’t overcommunicate to your property owners about these time-sensitive opportunities. SAHF has held 10+ peer sharing sessions about the IRA, and we plan to hold more.
- There are many organizations that can provide you with key talking points – you don’t need to recreate the wheel!
- Now is the time to ensure that programs are streamlined to allow for the infusion of outside funding (e.g. total development and per unit cost caps are adjusted)

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