Template for Certification Letter of BABA-Compliant Supply Under the Limited Nonavailability Waiver for Solar for All Modules

NATIONAL SOLAR FOR ALL NETWORK

What: This document is a template that manufacturers can use to certify to developers, program administrators, and Solar for All grantees that their products are in compliance with the 2025 temporary BABA waiver that EPA issued for the Solar for All program.

The temporary EPA waiver does NOT waive all of the manufactured product requirements but instead requires domestic assembly only. The waiver is available ONLY for solar modules, and it is valid between January 10, 2025 and December 31, 2025. Solar modules under the waiver in the Solar for All program must be installed, i.e., "permanently fastened to an outdoor support structure at the project site," by June 30, 2026.

This document should *NOT* be used as a template to comply with BABA outside of the limited 2025 EPA waiver. You should only rely on public sources for the rules applicable to the program. Additional information is available on the CESA website to help introduce those who are not familiar with BABA as well as other relevant material.

Who: This document can be used as reference by grantees, both prime and subrecipients, contractors, solar manufacturers, administrators, and other stakeholders involved in program implementation.

Note to manufacturers and utilities: BABA and "Buy American" standards are not the same. Meeting "Buy American" or other standards such as the domestic content requirements for tax credits does not mean you comply with BABA. While EPA does not require a specific certification form, your letter must explicitly reference BABA, even if your product falls under the limited waiver. For a quick comparison of different standards, see the cheat sheet on the CESA website.

Disclaimer: We do not make any guarantees with respect to the completeness of the information to be included. Rather, use this as a place to start. ***This is not legal advice***

LETTER TEMPLATE TO BE ADAPTED BY MANUFACTURERS - PLEASE CONSULT APPLICABLE RULES AND THE WAIVER LANGUAGE TO ENSURE COMPLIANCE

[Date]

[Recipient]

[Address]

Subject: BABA Certification Letter and Confirmation of U.S. Assembly of [Product]

Dear [Recipient],

We appreciate your interest in [Supplier]'s products for your Build America, Buy America ("BABA") Solar for All project. Ensuring compliance with the requirements outlined under BABA is important and we provide this letter to certify that our products (below) are assembled in the United States and comply with BABA.

We hereby certify that the products listed below:

1. Are assembled in the United States at our facility located in [city, state];
2. Comply with federal guidelines as stated in the 2025 U.S. Environmental Protection Agency Nonavailability Waiver for domestically assembled manufactured products; and
3. As such, meet the requirements of the Solar for All program if they are installed in a Solar for All project by June 30, 2026.

The final assembly at our facility of [name of solar module(s)] includes all operations involved in the transformation of individual solar cells and all other modules into a fully functional encapsulated module.

Our facility specializes in the assembly of [detail of the products]. Products covered under this certification letter are:

1. [product detail – name, type, year of production, other reference]
2. [product detail]
3. [product detail]
4. …..

Our assembly process includes the following steps:

1. [Include details about the assembly and production process, as relevant]
2. [Include details about the assembly and production process, as relevant]
3. …

We are proud to support projects that contribute to the growth of renewable energy infrastructure in the United States. Should you require additional documentation or have further questions, please do not hesitate to contact us at [email address].

Many thanks.

Kindly,

[Signature]

[Name, position, address, contact details]