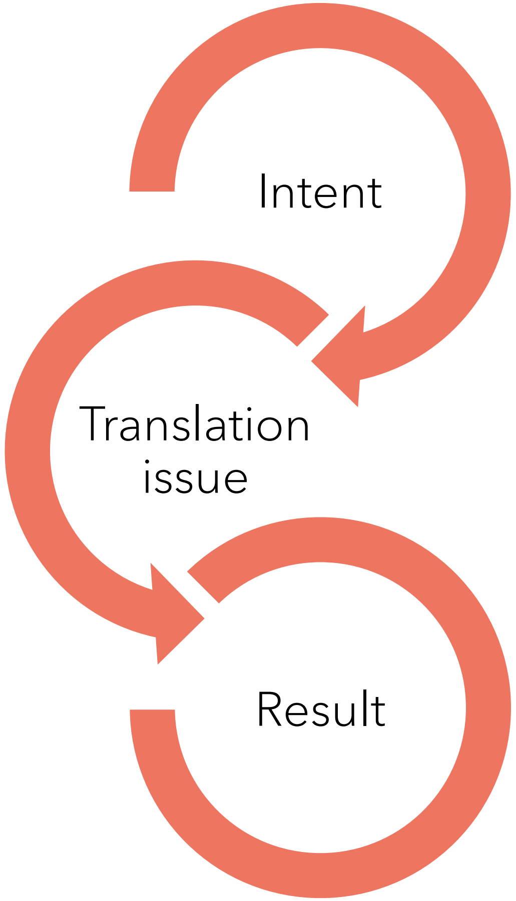
When ambitions get lost in translation

Myriam Tourneux

#1. Community solar in Maryland: when vulnerable risk losing their energy assistance benefits by accessing cheaper solar energy.



Equitable access: regulatory requirement that 40% of community solar energy output serve low- and moderate-income subscribers.

Eligible households were at risk of losing energy assistance benefits when participating in community solar program. This is due to:

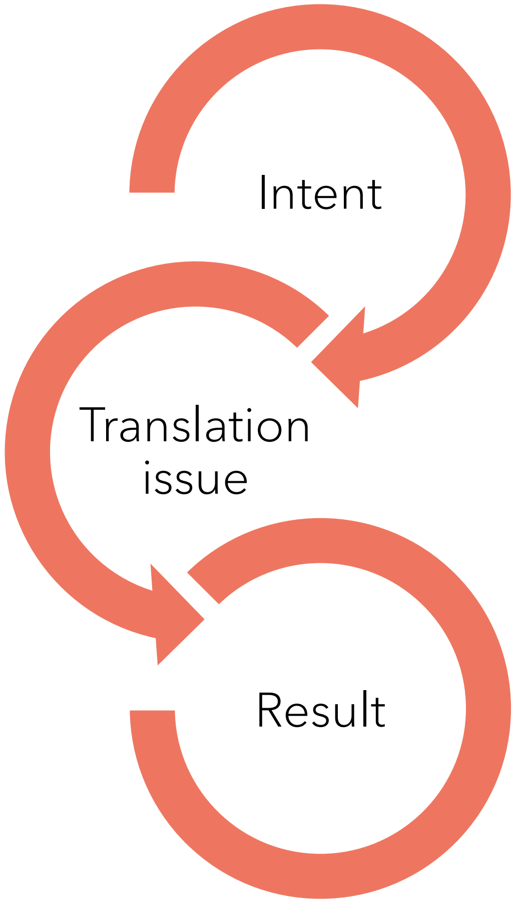
- Separate billing mechanisms for utility and solar.
- Administrative rules, processes and restrictions of energy assistance program (including grants only paid to the utilities).

A law was passed address that implementation gap and protect consumers via consolidated billing*. It was fully rolled out in 2026 … nearly a decade after the launch of the community solar pilot program.

**billing mechanism that allow to pay a community solar subscription via a single utility bill*

#2. Energy communities in Colombia: when disruptive ideas meet administrative realities

Community ownership. Colombia's Decree 2236 of 2023 set the legal framework for energy communities in Colombia. It explicitly opens the door for energy communities to receive public resources and develop or own distributed energy assets.

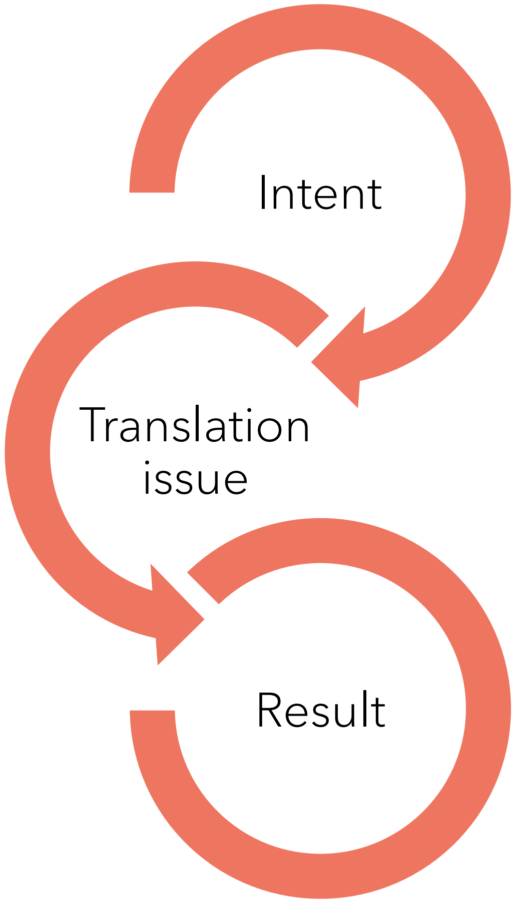


Requirements communities cannot meet. According to a resolution published in 2025, to qualify for the right to use IPSE*'s energy assets, interested entities must comply with financial and experience requirements most community groups, cannot comply with.

The resolution de facto favors projects led by incumbent operators. From a governance perspective, **the resolution shifted the decree's intent** of community-led energy to a model where experienced operators receive the use of IPSE's assets, and by extension most decision-making power.

**In Colombia, IPSE is a public entity responsible for financing and developing energy access projects in areas not connected to the national grid.*

#3. Locally-led ambitions: when unresolved tensions turn climate finance architecture into a structural access barrier.



Climate funds have embraced the language of "locally led" action and climate justice. Their strategies and policy statements routinely commit to sending more resources directly to local actors, strengthening local ownership, and reducing reliance on intermediaries.

Unresolved tension between ambitions and fiduciary obligations that transform finance architecture into structural access barriers. For example, eligibility rules require multi-year audited financial statements, robust safeguard systems, and the ability to manage complex reporting.

"Locally led" frequently means "locally implemented through international or national intermediaries. Community-level actors often appear at the end of the chain, as sub-grantees, contractors, or "stakeholders" consulted in project design, rather than as primary decision-makers or direct recipients of finance.

Fixes to translation issues often come late, through a piecemeal approach and after exhausting advocacy campaigns led by civil society groups.

So What?

- Align early. Before launch, map how a given solution interacts with existing benefits and rules. Draft explicit guidance on how to handle possible perverse effects. Break silos across agencies and administrations.

- Civil society needs and community groups must meaningfully participate in establishing regulations and administrative rules…. and need the institutional capacities and resources to play that role.

The just energy transition is about innovation and disruption to the current system. Yet, rules and procedures tend to favor incumbent and/or established energy companies or implementers.

So What?

- Not deciding IS a decision: the absence of detailed guidance on how to implement political ambitions maintains the status quo.
- Rules and processes must be designed for the most constrained actors so that systems and eligibility rules do not filter out community-based organizations.
- Tie "just" promises to enforceable levers: condition approval or funding based on evidence community entities are receiving a fair share of funds, can hold assets or co-govern rather than just being consulted.
- If we are serious about community-led action, community-based organizations need to access robust technical assistance services designed to align with their interests while improving their risk profile from an investor's perspective.

Sources and “food for thought” resources

- About the Maryland Community Solar program (link)
- Community Solar and Low-Income Utility Allowances (link)
- Colombia energy communities decree (link) and IPSE’s resolution (link)
- The good climate finance guide for investing in locally led adaptation, IIED (link)
- Intervenor compensation: supporting public participation in utility decisions, Environmental Defense Fund (link)
- Rescoop.eu (link) and the European Energy Communities Facility grant program (link)