Submitted to the U.S. Department of Agriculture, Rural Business-Cooperative Service
Docket: RBS-26-Business-0529; RIN 0570-AB13

November 2, 2026

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Rollins:

The National Association of State Energy Officials (NASEO) greatly appreciates the opportunity to provide comments on the Rural Energy for America Program (REAP) proposed final rule. NASEO represents the State Energy Offices from all 56 States, Territories, and the District of Columbia. The State Energy Offices and NASEO continue our strong support for the farmers, ranchers, and rural small businesses REAP serves.

NASEO supported the creation of REAP, on a bipartisan basis, under the 2002 Farm Bill. REAP benefits farmers, ranchers, and rural small businesses that typically are not served by other federal energy programs. For many years, State Energy Offices in every region of the nation have worked with state agricultural agencies to assist rural communities in accessing REAP's benefits. The result is the advancement of over 30,000 projects and attraction of hundreds of millions of dollars in non-federal investments for practical energy efficiency and locally-owned renewable energy projects that save money, improve agricultural operations, support small businesses, and help rural communities.

REAP's existing structure and private-sector-led energy development approach works. For example, in Towner, North Dakota, REAP support helped Towner Health & Wellness strengthen rural healthcare options by improving the facility that houses health and wellness professionals who serve residents closer to their homes. A $30,621 REAP energy efficiency project replaced aging heating and cooling systems, installed 62 energy-efficient LED light fixtures, and added a better-insulated, handicap-accessible entrance. These improvements are estimated to save $2,400 in utility costs each year and, as important, offer those seeking medical help a more comfortable – heating, cooling, lighting – facility. While $2,400 is modest compared to big-city health operations, it means a great deal to continuing the operation of a small rural health facility that provides access to essential services.

To ensure that REAP continues to support the nation's farmers, ranchers, small businesses, and rural communities, we respectfully request that the U.S. Department of Agriculture (USDA) withdraw the final rule and pause action. At a time when energy costs – electric and fuels – have soared, modifying this program in ways that limit its value to rural communities adds even more stress to their lives and livelihoods.

Congress intended that REAP help to both *develop* and *implement* agricultural energy projects. A rebate structure that requires managing up-front costs and financing – an impossibility for many smaller farms and other businesses – will skew benefits to those operations that may not need help. Larger operators may be able to front the costs of project development, while rural small businesses needing the most help cannot. REAP is a modest but important source of help at a time when energy costs are front-page news.

REAP works, and USDA should retain the existing structure and approach. We respectfully request that USDA maintain REAP's long-successful program design and work with the states and rural communities to discuss refinements that can be accomplished on a bipartisan basis in the next Farm Bill.

Best regards,



David Terry
President, National Association of State Energy Officials