MISSOURI GREEN BANC | NATIONAL PACE CAPITAL ACCESS

Program Framework

Objectives, guidelines, and operational methods

Program: National PACE Capital Access (NPCA)

Operator: Missouri Green Banc, Inc. (MGB) — 501(c)(3) nonprofit green bank

Statutory C-PACE Authority: Missouri Clean Energy District (MCED), §67.2800 RSMo

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1. Executive Summary

The National PACE Capital Access (NPCA) program is a free, open platform operated by Missouri Green Banc (MGB) that connects the three key participants in Missouri C-PACE transactions: property owners undertaking commercial, industrial, agricultural, or qualifying nonprofit projects; capital providers who finance those projects; and contractors who deliver the eligible work. NPCA recruits capital providers and contractors nationally to serve Missouri projects assessed by the Missouri Clean Energy District (MCED), the statutory C-PACE authority under §67.2800 RSMo.

NPCA is built on three principles. First, the program is free at the point of use for every participant — property owners, capital providers, and contractors alike — with no participation fee, no service fee, no success fee, and no compensation tied to any transaction. Second, the program is neutral — matching is based exclusively on criteria participants themselves submit, and the program publishes the rules by which fit is computed. Third, the program is funded as public infrastructure — through grants, foundation support, MGB program revenue, and the structurally separate MGB Founders Program.

NPCA does not originate, underwrite, or hold C-PACE assessments. It does not pool, hold, or deploy capital. It does not perform, subcontract, or oversee construction work. It does not charge transaction fees, success fees, brokerage, referral compensation, or any compensation tied to closings, awarded contracts, or completed work. All transactions remain bilateral — between the property owner and the selected capital provider for financing, and between the property owner and the selected contractor for work delivery. MCED remains the statutory assessment authority.

This Framework establishes the program's objectives, governance, registration approach for each participant type, operational methods, and relationship to the broader Missouri Green Banc ecosystem. It is supported by operating documents that together constitute the complete NPCA program.

Plain-language note

This is the 2.2 — Open Platform Edition of the NPCA Program Framework. It reflects the redraft of the 2.0 Open Platform Edition to establish contractors as an explicit third participant type alongside property owners and capital providers, and to apply the fee-free principle consistently to all three. All prior 2.0 principles remain: no tiers, no participation fees, no first-look access intervals, level footing for all registered participants, and matching driven entirely by criteria participants themselves submit. The 2.1 revision extends those principles to contractor participation and formalizes the two-track selection model in which the property owner independently selects one contractor and one capital provider from separately-computed fit sets.

2. The three key participants in NPCA

Missouri C-PACE transactions require the coordinated activity of three parties: the property owner who initiates and benefits from the project, the capital provider who finances it, and the contractor who delivers the eligible work. NPCA is organized around these three participants as first-class registered participant types.

Property Owners	Contractors	Capital Providers
FREE	FREE	FREE
The key driver of every project. Chooses the contractor and the capital provider independently.	Registered work-scope providers matched to project elements. Selected by the property owner.	Registered financing providers matched to loan elements. Selected by the property owner.

2.1 Property Owners

Property owners are the key driver of every NPCA project. A commercial, industrial, agricultural, or qualifying nonprofit property owner in Missouri initiates NPCA engagement by describing a project — property attributes, measure scope, financing needs, and delivery timeline. The property owner makes two independent selections: one contractor to deliver the work, chosen from the contractor registry on the basis of fit to the project's work elements; and one capital provider to finance the project, chosen from the capital registry on the basis of fit to the project's loan elements. The two selections are not linked, and the property owner has full control over both.

2.2 Capital Providers

Capital providers are qualified national and Missouri-based lenders and investors registered with NPCA to finance Missouri C-PACE projects. Every registered capital provider is on level footing with every other. Registration categories are descriptive rather than hierarchical, and matching to projects is driven exclusively by the criteria providers submit in their Lending Criteria Profiles. A capital provider becomes visible to a property owner when the property owner's project matches the provider's stated loan elements — deal size, geography, property type, product type, eligible measures, and so on.

2.3 Contractors

Contractors are qualified national and Missouri-based contractors, subcontractors, general contractors, energy services companies, and design professionals registered with NPCA to deliver eligible work on Missouri C-PACE projects. Every registered contractor is on level footing with every other. Registration categories describe the kind of work the contractor delivers rather than any hierarchy of preference, and matching to projects is driven exclusively by the criteria contractors submit in their Contractor Capability Profiles. A contractor becomes visible to a property owner when the property owner's project matches the contractor's stated work elements — measure categories, property types, geography, project size, and licenses/qualifications.

2.4 The two-track selection model

Contractor selection and capital provider selection are two separate, unlinked processes. The property owner selects a contractor from the contractor registry on the basis of contractor fit; the property owner selects a capital provider from the capital registry on the basis of capital fit; and NPCA never links the two selections. This structure protects the property owner's independence, prevents preferred-partner arrangements between contractors and capital providers from influencing owner choice, and preserves the neutrality of the platform. Fit is computed per track — contractor fit uses project attributes crossed with registered work elements; capital fit uses project attributes crossed with registered loan elements — and NPCA surfaces best-fit candidates on each track independently for the owner's independent selection.

3. Fee-free at the point of use — for all three participants

NPCA is unusual among capital-access platforms in charging no fees to any participant. This section states the principle explicitly, because the principle is central to the program's neutrality and to MGB's role as a 501(c)(3) operating public-good market infrastructure.

NPCA is free at the point of use for all three participant types

- **Property Owners** pay no fees to MGB for using NPCA — no service fee, no matchmaking fee, no success fee, no fee tied to any closed transaction.
- **Capital Providers** pay no fees to MGB for participating in NPCA — no registration fee, no listing fee, no annual fee, no success fee, no fee tied to any closed transaction.
- **Contractors** pay no fees to MGB for participating in NPCA — no registration fee, no listing fee, no annual fee, no referral fee, no fee tied to any awarded work.

3.1 What this means in practice

- Property owners never pay MGB for finding a contractor or a capital provider through NPCA. There is no service fee, no matchmaking fee, no success fee, no fee at any stage of the property owner's engagement.
- Capital providers never pay MGB for participating in NPCA. Registration is free. Listing is free. Renewal is free. There is no success fee, brokerage fee, or transaction-based compensation of any kind. Curated matchmaking and RFP distribution are free and available on level footing to every Active provider whose criteria match a project.
- Contractors never pay MGB for participating in NPCA. Registration is free. Listing is free. Renewal is free. There is no referral fee, project-award fee, or compensation of any kind tied to work awarded through NPCA. Contractor introductions and directory access are free and available on level footing to every Active contractor whose capabilities match a project.
- No participant subsidizes any other participant through NPCA. Every participant type is fee-free. The program is funded through MGB's broader revenue stack — grants, foundation support, program revenue, and the structurally-separate MGB Founders Program — not through participant fees.

3.2 Why fee-free

- Charging any participant would create actual or perceived private-benefit risk inconsistent with MGB's 501(c)(3) status.
- Charging property owners would suppress project pipeline in the very market NPCA exists to grow.
- Charging capital providers would create pay-to-play dynamics that compromise platform neutrality and reduce the diversity of the capital pool.
- Charging contractors would filter out smaller, local, and workforce-focused contractors whose participation matters most for equitable market development.
- A uniform free-at-the-point-of-use model is the simplest defensible structure and the model foundations, federal funders, and public partners can support most easily.

4. Program Objectives

4.1 Primary Objectives

1. Expand the pool of qualified national and Missouri-based capital available to Missouri C-PACE projects on a free, open, criteria-driven platform.

2. Expand the pool of qualified national and Missouri-based contractors available to deliver eligible work on Missouri C-PACE projects on a free, open, criteria-driven platform.
3. Give Missouri property owners visible, comparable options on both tracks — contractor and capital provider — chosen independently by the owner on the basis of stated criteria.
4. Establish transparent, equitable matching practices on both tracks that maintain MGB's neutrality as program administrator and MCED's statutory role as assessment authority.
5. Build an enduring community of capital partners, contractor partners, and property-owner participants committed to Missouri C-PACE growth — with resource support for Missouri community banks and credit unions exploring the asset class, and for Missouri contractors entering the commercial retrofit market for the first time.

4.2 Secondary Objectives

- Aggregate and publish anonymized market intelligence on Missouri C-PACE activity — including capital terms, contractor practice, deal sizes, and product types — to support sound market development.
- Support the CLEAR initiative and similar place-based programs by providing a credible capital and contractor network sponsors can reference in outreach.
- Reduce friction in the process by standardizing documentation, intake, and verification steps shared among property owners, capital providers, contractors, and MGB.
- Create a forum for capital providers and contractors to provide structured feedback on program design, documentation, and policy development through the Charter Council.
- Cultivate underwriting capacity among Missouri community banks and delivery capacity among Missouri contractors, particularly those new to the commercial C-PACE market.

4.3 What NPCA Is Not

- NPCA is not a fund, an investment vehicle, or a syndication. It does not pool, hold, or deploy capital.
- NPCA is not a contractor. It does not perform, subcontract, or oversee construction work.
- NPCA does not underwrite, originate, or service C-PACE assessments. Those functions remain with the capital provider and MCED.

- NPCA is not a broker. MGB charges no participation fees, success fees, commissions, referral compensation, or transaction-based compensation from any participant.
- Registration in NPCA is not an MGB or MCED endorsement of any capital provider's products, terms, or institutional quality, or of any contractor's work, methods, or business practices.
- NPCA does not confer any commercial advantage in exchange for charitable or sponsorship contributions to MGB. The MGB Founders Program is structurally separate from NPCA participation.

5. Governance and Administration

NPCA is a program of Missouri Green Banc, governed by MGB's Board of Directors. Day-to-day administration sits with the MGB President and designated NPCA staff. The Charter Council — an advisory body whose members are recognized for sustained contribution of time, expertise, and program engagement — provides ongoing input on program direction, documentation standards, and practice. Charter Council seats include representation from all three participant types. The Charter Council is advisory; final program decisions rest with MGB.

MGB's role as platform administrator is distinct and separable from MCED's role as the statutory C-PACE authority. NPCA does not change, replace, or supersede any MCED process, assessment protocol, or program requirement. All C-PACE assessments on Missouri property continue to flow through MCED in accordance with §67.2800 RSMo.

6. Participant Eligibility

Eligibility standards apply to each participant type. Every registered participant on either the capital track or the contractor track is on level footing with every other participant of the same type. Baseline standards below apply uniformly within each track.

6.1 Property Owner Eligibility

Property owners engage with NPCA voluntarily and without registration barriers. The following baseline standards apply to any project brought to NPCA:

- The property is in Missouri and in an MCED-eligible jurisdiction.
- The property type is one of the eligible categories under MCED program rules.
- The measure scope appears C-PACE-eligible under the MGB program standard, including the energy-tie requirement for water and resiliency measures.

- There is an identifiable sponsor and contact who has authorized MGB to assist.
- The property owner signs a Borrower Consent authorizing information sharing with matching capital providers, matching contractors, or both, as the property owner elects.

6.2 Capital Provider Eligibility

- Legal organization in good standing in the jurisdiction of the registrant's principal place of business.
- Authority to lend to, invest in, or fund commercial real estate or commercial property assessments in Missouri, either directly or through a duly licensed affiliate, servicer, or partner.
- Demonstrated familiarity with C-PACE through prior closings, pending pipeline, executed term sheets, or completion of MGB-recognized C-PACE education.
- Designation of a primary NPCA contact authorized to speak for the registrant on appetite, criteria, and intake.
- Agreement to MGB's Capital Provider Code of Conduct, NPCA Capital Provider Participation Agreement, and the data and use terms in Section 10.
- Submission of a complete Lending Criteria Profile and commitment to keep it current and refresh it at least annually.

6.3 Contractor Eligibility

- Legal organization in good standing in the jurisdiction of the registrant's principal place of business.
- Authority to perform the work the contractor describes in its Capability Profile in Missouri — including all applicable licenses, certifications, and registrations for the work type, jurisdiction, and property class.
- Demonstrated capacity to deliver commercial C-PACE-eligible work — through prior projects, active pipeline, executed contracts, workforce credentials, or completion of MGB-recognized contractor education.
- Current general liability insurance and any other insurance required by the work type and jurisdiction, in amounts appropriate to the projects the contractor pursues through NPCA.
- Designation of a primary NPCA contact authorized to speak for the registrant on capabilities, capacity, and intake.
- Agreement to MGB's Capital Provider Code of Conduct (or the parallel Contractor Code of Conduct where applicable), NPCA Contractor Participation Agreement, and the data and use terms in Section 10.

- Submission of a complete Contractor Capability Profile and commitment to keep it current and refresh it at least annually.

6.4 Capital Provider Registration Categories

Every registered capital provider is identified with one registration category that describes the kind of institution and typical profile of appetite. Categories are descriptive; no category is preferred, prioritized, or ranked above any other.

Registration Category	Typical Profile
Specialty C-PACE Lender	Dedicated C-PACE platforms and specialty finance companies
Regional or National Bank	Commercial banks with dedicated C-PACE teams or partnerships
Community Bank or Credit Union	Missouri community institutions — supplementary Community Bank Resource Program available
CDFI or Mission Lender	CDFIs and mission lenders with C-PACE-eligible mandates
Green Bank or Public-Purpose Entity	State and local green banks; public finance authorities
Private Credit or Debt Fund	Institutional debt funds and private credit platforms
Family Office	Family offices with direct commercial real estate credit appetite
Insurance Company General Account	Insurance allocators deploying long-duration capital into CRE credit
Foundation or PRI Vehicle	Foundations and PRI vehicles with relevant authority and alignment

6.5 Contractor Registration Categories

Every registered contractor is identified with one registration category that describes the kind of work delivered and the typical profile of capability. Categories are descriptive; no category is preferred, prioritized, or ranked above any other. Contractors may participate in more than one category where their capabilities span categories, subject to their qualifying credentials and demonstrated experience in each.

Registration Category	Typical Profile
Energy Efficiency Specialist	Contractors specializing in HVAC, lighting, controls, and building-envelope efficiency measures

Registration Category	Typical Profile
On-Site Renewables Installer	Solar PV, solar thermal, and small-wind installers with commercial C-PACE experience
Electrification / EV Infrastructure	Contractors installing electrification systems and EV charging infrastructure
Building Envelope Specialist	Roofing, insulation, glazing, and building-envelope contractors with commercial experience
Water Efficiency (Energy-Tied)	Water-efficiency contractors delivering measures with a documented energy benefit
Resiliency (Energy-Tied)	Resiliency contractors delivering measures with a documented energy benefit
General Contractor — Commercial Retrofit	GCs coordinating multi-measure retrofit and repositioning work on commercial property
General Contractor — New Construction	GCs delivering ground-up commercial construction incorporating C-PACE-financed measures
Energy Services Company (ESCO)	ESCOs providing integrated energy performance services with C-PACE-compatible contracting
Design Professional	Architects, engineers, and commissioning agents supporting C-PACE project design and delivery

6.6 Community Bank Resource Program and Contractor Onboarding Support

Missouri community banks and credit unions registered in the Community Bank capital category have access to a supplementary resource program described in the Community Bank Resource Program document (NPCA-CBR-001). Missouri contractors entering the commercial C-PACE market for the first time have access to a parallel Contractor Onboarding Program described in the Contractor Onboarding Program document (NPCA-COP-001). Both supplementary programs are optional, are available at no cost, and do not change the participating institution's or contractor's status — all participants are on level footing with all others of the same participant type.

7. Registration and Engagement

NPCA uses a single registration status for each participant type combined with a transparent operational engagement signal. The structure is deliberately simple and identical in principle across the capital and contractor tracks.

7.1 Registration Status

Every qualified capital provider is a Registered Capital Provider. Every qualified contractor is a Registered Contractor. Every property owner engaging with NPCA is a Registered Property Owner for the duration of their project. There is one status per participant type. There are no fees at any status. There are no tiers above the base.

7.2 Engagement Status

Each Registered Capital Provider and each Registered Contractor carries a visible engagement status — Active or Inactive — that reflects current operational readiness, not financial commitment. The engagement status is binary, transparent, and behavior-based.

- A capital provider is Active when its Lending Criteria Profile has been refreshed within the last twelve months and it has responded to introductions from MGB within reasonable timeframes (target: ten business days).
- A contractor is Active when its Contractor Capability Profile has been refreshed within the last twelve months and it has responded to property-owner inquiries directed through NPCA within reasonable timeframes (target: ten business days).
- A provider or contractor is marked Inactive when its Profile has not been refreshed for more than twelve months, or when it has consistently failed to respond to introductions or inquiries.
- Inactive status is reversible at any time by refreshing the Profile and confirming continued participation.
- Inactive registrants remain visible in the directory but are clearly marked so property owners can adjust expectations. They do not receive new curated introductions until they return to Active status.

7.3 Charter Council Recognition

The Charter Council is an advisory body whose members are recognized for sustained contribution to NPCA — through substantive framework feedback, market intelligence sharing, sustained transaction or project participation, education content contribution, or comparable service. Membership is by invitation from MGB based on documented criteria set out in the Charter Council Charter (NPCA-CCC-001). The Council has seats for both capital-provider representatives and contractor representatives, in a mix that reflects the diversity of the platform. Council seats are recognized in NPCA materials by name and institution. Charter Council membership is not a paid status, does not confer commercial advantage, and does not provide preferential access to project introductions or contractor selection.

8. How Property Owners Use NPCA

A property owner engages with NPCA to find a contractor, a capital provider, or both, for a Missouri C-PACE-eligible project. The property owner selects the level of service that fits the project on each of the two tracks independently.

8.1 The three service levels — available on both tracks

Directory access: Surfaced listings of every Active Registered Capital Provider and every Active Registered Contractor, filterable by category and by stated criteria. The property owner browses each directory and contacts registrants directly.

Curated matchmaking: MGB matches the project against the Profiles of every Active registrant on the selected track and provides the property owner with a list of every registrant whose criteria match. On the contractor track, matching uses project attributes crossed with the contractor's stated work elements. On the capital track, matching uses project attributes crossed with the capital provider's stated loan elements. Where a matching set is large, MGB applies the documented, objective tie-breakers set out in the Matchmaking Protocol.

Structured process: For the capital track, MGB packages a Structured RFP that goes simultaneously to every Active matching capital provider. For the contractor track, MGB packages a Structured RFQ (Request for Qualifications) that goes simultaneously to every Active matching contractor. Responses on either track go directly to the property owner.

8.2 Two independent selections

The property owner selects a contractor from the contractor track and a capital provider from the capital track independently. NPCA does not link the two selections and does not condition one on the other. The property owner may select a contractor first, a capital provider first, or both in parallel. The property owner may also select on only one track — for example, when a contractor has already been engaged and only capital is needed, or when financing is in place and only a qualified contractor is needed.

8.3 Boundaries common to all service levels on both tracks

- MGB does not represent the property owner, the capital provider, or the contractor. All transactions and contracts are bilateral between the property owner and the selected counterparty on each track.
- MGB does not charge brokerage, success, placement, referral, or transaction-based fees from any participant.
- Capital providers and contractors commit to honoring the stated criteria in their submitted Profiles; material changes must be communicated to MGB on a timely basis.

- Property owner contact information is shared with capital providers and contractors only with the property owner's informed consent.

9. Operational Methods

9.1 Registration Workflow (Capital Providers and Contractors)

6. Prospective registrant submits the NPCA Registration Form for the appropriate participant type, including baseline eligibility attestations and the registration category that best describes the institution or firm.
7. Registrant submits the appropriate Profile — the Lending Criteria Profile for capital providers, or the Contractor Capability Profile for contractors — covering the fields required for matching.
8. MGB conducts baseline eligibility review and confirms the registration category.
9. Registrant and MGB countersign the appropriate NPCA Participation Agreement — the Capital Provider Participation Agreement or the Contractor Participation Agreement.
10. Registrant's profile is published in the appropriate NPCA directory with Active engagement status. The registrant becomes eligible to receive curated introductions from Missouri property owners at all service levels.

9.2 Property Owner Intake Workflow

11. Property owner contacts MGB through email, phone, or the website.
12. MGB acknowledges within two business days and shares the Borrower Quick Guide.
13. MGB conducts a baseline eligibility screen — confirms Missouri location in an MCED-eligible jurisdiction, eligible property type, C-PACE-eligible measure scope, identifiable sponsor and contact, and sufficient information to prepare a project summary.
14. Property owner selects the desired service level on each track (may be different levels on each track, or one track only).
15. Property owner signs the Borrower Consent authorizing information sharing on the selected tracks.
16. MGB executes the selected service level on each track and returns matched lists, curated introductions, or structured process responses to the property owner.

9.3 Lending Criteria Profile

The Lending Criteria Profile (NPCA-LCP-001) is the operational heart of the capital track. Required fields include product types, geographic appetite, deal size, eligible property types, eligible measure categories, sponsor and asset criteria, exclusions, and process expectations.

9.4 Contractor Capability Profile

The Contractor Capability Profile (NPCA-CCP-001) is the operational heart of the contractor track. Required fields include licenses and certifications, geographic service area, project size range, eligible property types, eligible measure categories, delivery capacity, sponsor and project criteria, exclusions, prior C-PACE project experience, and process expectations.

9.5 Curated Matchmaking Workflow (Capital Track)

17. MGB receives a project from property owner intake.
18. MGB matches project attributes against the Lending Criteria Profiles of every Active capital provider.
19. MGB delivers the property owner a list of every matching provider, with each provider's stated criteria visible. Where the list is large, documented tie-breakers from the Matchmaking Protocol apply.
20. Property owner contacts selected providers directly.

9.6 Curated Matchmaking Workflow (Contractor Track)

21. MGB receives a project from property owner intake.
22. MGB matches project attributes against the Contractor Capability Profiles of every Active contractor.
23. MGB delivers the property owner a list of every matching contractor, with each contractor's stated capabilities visible. Where the list is large, documented tie-breakers from the Matchmaking Protocol apply.
24. Property owner contacts selected contractors directly.

9.7 Structured Process Workflows

25. For the capital track, MGB prepares a standardized RFP using the NPCA Structured RFP Template (NPCA-RFP-001) with the property owner's confirmed project information.
26. For the contractor track, MGB prepares a standardized RFQ using the NPCA Structured RFQ Template (NPCA-RFQ-001) with the property owner's confirmed project information.
27. The RFP goes simultaneously to every Active matching capital provider. The RFQ goes simultaneously to every Active matching contractor. Neither instrument uses first-look intervals or priority sequencing.
28. Responses on each track go directly to the property owner, with a copy to MGB for program records. MGB does not score, rank, or recommend responses on either track.

9.8 Annual Profile Refresh

Each capital provider refreshes its Lending Criteria Profile at least once each year. Each contractor refreshes its Contractor Capability Profile at least once each year. MGB sends refresh prompts; staff assistance is available on request. Registrants who do not refresh within twelve months are marked Inactive until the refresh is completed.

9.9 Reporting and Market Intelligence

MGB publishes anonymized market intelligence on Missouri C-PACE activity covering both tracks — aggregate deal counts, average sizes, measure-category mix, contractor practice patterns, deal-to-project ratios, and other non-identifying metrics. Reports are available to all NPCA participants and to the broader market. Identifying details are never published without the affected parties' written consent.

9.10 Tie-Breaker Transparency

Where a matching set on either track is too large for practical introduction, MGB applies the tie-breakers documented in the Matchmaking Protocol. Tie-breakers are objective, published, and applied consistently. On the capital track, they include closer fit to deal size, geographic specificity, demonstrated track record in the property type, capacity to act in the borrower's timeframe, and equitable rotation. On the contractor track, they include closer fit to project size, geographic specificity, demonstrated track record in the measure category and property type, capacity to start within the borrower's timeframe, and equitable rotation. The application of tie-breakers is recorded in program records.

10. Standards, Conduct, and Data

10.1 Code of Conduct — Capital Providers

- Honor the criteria stated in the registered Lending Criteria Profile; update promptly when appetite changes.
- Communicate directly and timely with property owners introduced through NPCA, whether or not a term sheet results.
- Treat property owner information shared through NPCA as confidential and use it solely for evaluating the introduced transaction.
- Decline conflicts of interest; disclose material relationships.
- Comply with all applicable lending, securities, fair lending, AML, and consumer protection laws.

10.2 Code of Conduct — Contractors

- Honor the capabilities stated in the registered Contractor Capability Profile; update promptly when capacity, licenses, or capability change.

- Communicate directly and timely with property owners introduced through NPCA, whether or not a contract results.
- Treat property owner information shared through NPCA as confidential and use it solely for evaluating the introduced project.
- Maintain current licenses, certifications, and insurance required for the work; notify MGB without delay of any lapse or regulatory action.
- Decline conflicts of interest; disclose material relationships — including any pre-existing relationship with a capital provider that could compromise the property owner's independent selection on either track.
- Perform work in a professional, safe, and code-compliant manner consistent with the standards of the trade.
- Comply with all applicable licensing, safety, employment, and consumer protection laws.

The complete Code of Conduct with provisions common to both participant types is set out in NPCA-CC-001.

10.3 Property Owner Protections

- Property owner contact details are released to capital providers and contractors only with the property owner's informed consent.
- Property owners may decline to be matched, may select any subset of suggested capital providers or contractors, and may exit the process at any time on either track.
- Property owner decisions are not reported to non-selected capital providers or contractors beyond a courtesy notification that the search has concluded on the respective track.
- MGB does not share property owner information with third parties beyond the capital providers or contractors introduced for the specific project.

10.4 Data Handling

MGB maintains capital provider information, contractor information, project information, and matchmaking records in accordance with MGB's data and privacy practices. Profile information is shared with property owners in the context of matchmaking. Aggregate, de-identified information may be used in NPCA reports.

10.5 Suspension and Removal

MGB may suspend or remove a capital provider or contractor for material misrepresentation, repeated breach of the Code of Conduct, sustained unresponsiveness to property owner introductions, regulatory action that materially impairs the ability to lend or perform work, or other conduct inconsistent with the integrity of the program. The Suspension and Removal Procedures (NPCA-SR-001) describe the notice, response, and review process for both participant types. Suspension and removal are distinct from routine Inactive engagement status.

11. Funding Model

NPCA is free at the point of use for all three participant types. No participation fee, registration fee, listing fee, service fee, success fee, brokerage fee, referral fee, or transaction-based compensation applies to any property owner, capital provider, contractor, or other participant. The program is funded as public market infrastructure through MGB's broader revenue stack:

- Grants and program support from foundations, federal agencies, and other public-purpose funders aligned with green-bank and climate-finance missions.
- Technical assistance contracts and program revenue from MGB's broader services.
- The MGB Founders Program, which operates as a structurally separate philanthropic engagement channel. Support of MGB through the Founders Program is purely philanthropic and does not confer any commercial advantage in NPCA participation, matching, or property-owner selection on either track.

The complete description is set out in the NPCA Funding Model document (NPCA-FM-001).

12. Relationship to MCED, CLEAR, and the Broader Ecosystem

NPCA is one of several complementary MGB programs.

Missouri Clean Energy District (MCED): The statutory C-PACE authority; MCED's processes, member jurisdictions, and statutory protocols are unchanged by NPCA.

CLEAR Initiative: NPCA provides the credible capital and contractor networks that CLEAR and similar place-based outreach efforts reference when they engage property owners.

Contractor and Property Owner Training: MGB's training ecosystem produces informed contractors and property owners; NPCA matches informed participants with appropriate counterparties on each track.

Municipal Membership Program: MCED member jurisdictions expand the geographic reach of available projects; NPCA broadens both the capital and contractor sides of the same market.

MGB Founders Program: A structurally separate philanthropic channel for mission-aligned donors and sponsors. Founders support recognizes contribution to MGB's broader mission; it does not confer NPCA commercial advantage on any participant.

13. Launch Approach

Because NPCA is free and open to all qualified participants on both tracks, the program does not require a pre-launch recruiting period or a closed founding cohort. The platform launches publicly when documentation, operational workflows, and funding paths are in place. Launch is phased to allow operational scaling on tested foundations:

Phase 1 — Public Launch

- Public NPCA web presence opens; registration is available to all qualified capital providers and all qualified contractors nationally.
- Initial outreach across all registration categories on both tracks.
- First Charter Council seats — including both capital and contractor representatives — recognized based on contributions to program design and early framework feedback.

Phase 2 — Operational Maturation

- Curated matchmaking begins on both tracks for MCED pipeline and CLEAR-sourced projects.
- Community Bank Resource Program activated for Missouri community institutions.
- Contractor Onboarding Program activated for Missouri contractors entering commercial C-PACE.
- First anonymized market intelligence report published, covering both tracks.

Phase 3 — Platform Stabilization

- Annual Profile refresh cycles stabilize on both tracks; engagement status reflects steady-state participation.
- Charter Council convenes its first strategic review of program operations, documentation, and matching practice on both tracks.
- Inaugural NPCA participants' meeting hosted in conjunction with Charter Council meeting.

14. Contact

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