

RFI

- Home Efficiency & Electrification Rebate Programs (IRA)

Due

- 8:00pm ET on March 3, 2023

Respondents

- The Maine State Housing Authority (MaineHousing)
- The Maine Governor’s Energy Office (GEO)

Resources

- [EERE FOA](#)
- [RFI](#) (Download link)
- [Program summary](#)

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Respondent Contact Information

- 1) Please provide your contact information, including your name, organization, type of organization (state government, non-profit/community organization, individual, etc.), phone number, and email address.

Ross Anthony

Maine Governor's Energy Office (GEO)

State Government

NOTE:

The Maine Governor's Energy Office (GEO) is the state's designated energy office that is established in the Executive Department to carry out responsibilities of the State relating to energy resources, planning and development. The office is directly responsible to the Governor. The Director sits on the Board of Efficiency Maine Trust, Maine's program administrator for energy efficiency programs, as well as the National Association of State Energy Officials. The Efficiency Maine Trust has submitted additional responses independently.

The GEO supports the comments made by NASEO, especially those related to program flexibility, and offers these comments in coordination with the Maine State Housing Authority (MaineHousing) on a single response to this RFI. Please direct any clarifying questions from these responses to ross.anthony@maine.gov.

Accessible and Equitable Program Design

- 2) What best practices can program administrators and other relevant stakeholders (e.g., retailers, contractors, or community-based organizations) use to ensure that disadvantaged communities and low-income households are aware of and have easy access to the Home Energy Rebate programs?

State energy offices and their partners, have existing relationships with these communities and those that serve them. These funds will ensure continued engagement with partners within the community that are already serving the disadvantaged communities (e.g., Community Action Agencies, Community Outreach Organizations, General Assistance offices, etc.). Existing best practices should be utilized, such as providing accommodations for issues around limited English proficiencies and providing flexibility of funding to design programs that effectively reach communities that take into account local characteristics. Maine has convened an equity working group that discusses many of those issues and can be found here: https://www.maine.gov/future/sites/maine.gov.future/files/inline-files/MCC_EquitySubcommitteeInterimReport_Feb2022.pdf

Each jurisdiction will have unique challenges and opportunities to meet these communities and program flexibility is paramount to success. For example, Maine is uniquely dependent on delivered fuels such as heating oil and kerosene, has an older housing stock and is a large, rural state. This will necessarily require differing approaches to more urban jurisdictions and flexible approaches will be necessary.

- 3) How can DOE encourage program administrators to design their rebate programs to align with the Justice40 Initiative, which commits to delivering forty percent of the overall benefits (home improvements, jobs, etc.) from certain federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution?

The GEO offers the following:

- Encourage engagement with leaders in the disadvantaged communities to determine the communities need.
- Allow program flexibility to be able to address the various needs of each community as each community has a unique set of needs.
- Allow for a simplified application process that empower states already working with these communities (e.g., MaineHousing, Equity Sub-Committee, , etc.).

- 4) How can DOE and program administrators ensure that community-based organizations, residents of disadvantaged communities, renters, and marginalized groups such as low-income residents, residents of color, rural residents, and Tribal residents are meaningfully engaged for the Home Energy Rebate programs? What other groups should be included?

Ensure state flexibility to allow collaboration with partners within the community that are already serving the disadvantaged communities (e.g., Community Action Agencies, Community Outreach Organizations, General Assistance offices, etc.). Provide guidance and tools to help engage these groups. Allow funding flexibility to ensure disadvantaged communities receive what they need.

What other groups should be included?

- 5) How can the Home Energy Rebate programs help to minimize energy burden and costs, particularly in low- and moderate-income (LMI) and high energy burden households?

In Maine, the adoption of electric measures such as high efficiency air source heat pumps or heat pump hot water heaters have proven to reduce energy costs for Maine people – even when not done in tandem with weatherization projects. Maine has seen nation-leading growth in these sectors for many

reasons but in large part due to the reduction in home energy costs that they provide. Maine also has a goal to double the pace of weatherization and is making progress on these goals. The Home Energy Rebate programs will help Maine expand program offers and focus on increasing incentives to consumers that may not be reached or to those that are most vulnerable and need additional incentives to take action.

The GEO recommends collaborating with agencies in the catchment area that are providing DOE services (e.g., MaineHousing and Community Action Agencies) and ensure a referral stream is in place to continue services.

- 6) What types of program design approaches, guidelines, tools, savings analyses, policies or reviews can help discourage contractors from using rebates for upgrades that will likely result in higher annual household energy bills, particularly for low-income households?

As has been done in Maine, it is critical to provide easy-to-use and streamlined monetary incentives for contractors to install desired equipment – and not to complicate this process by tying multiple measures completed by different contractors together. Allow states to have flexibility in program design/deployment and to use existing programmatic pathways to achieve climate and energy efficiency goals and providing easy-to-access and easy-to-understand education materials for recipients of these incentives and rebates. Allow education materials to be tailored at the state level.

- 7) What types of policies or requirements can be used to ensure that owners of rental properties receiving rebates targeted for low-income households continue to offer affordable rents for a reasonable time after improvements are made?

Require owners of the properties to certify they are continuing to provide affordable rents on an annual basis for a determined period of time.

How might DOE also incentivize multifamily affordable housing property owners to participate in these programs?

- 8) Given that rebate allocations are intended to be applied to residential properties within that state, tribe, or territory's jurisdiction, how can program administrators ensure proper rebate processing in instances when the equipment/service provider and the household are in two different jurisdictions?

- 9) What are best practices for implementing successful 'point of sale' rebates, including when considering contractor needs?

Require necessary rebates (e.g., heat pumps) to flow through contractors similar to what states currently implement and for point-of-sale rebates (e.g., heat pump water heaters), allow states to implement with existing programmatic pathways.

- 10) For federally subsidized, low-income housing, what specific program design parameters are necessary to ensure rebates can be used at these properties?

Require the measures that received a rebate or incentive to be installed by certified contractors (i.e., already in place in Maine) to ensure appropriate sizing and location.

- 11) What quality control measures are needed to ensure that contractors practice safe and healthy homes best practices, and that projected savings are achieved?

In Maine, we require the rebated measures to receive a quality check on the system after installation to ensure proper usage. Training and information should also be passed on to the recipient to ensure proper usage. During this time, additional information such as opportunities for an energy audit and provision of educational materials on incentives or rebates available.

- 12) Which Home Energy Rebate program components across Sections 50121 and 50122 should be implemented separately or together? Some examples could include:
- a) Marketing, communications, branding
 - b) Income verification
 - c) Rebate processing
 - d) Contractor requirements
 - e) Home energy assessments
 - f) Data collection and reporting

Additional Design Considerations Specific to Indian Tribes

- 13) Funds reserved for Indian Tribes will be made available in “a manner determined appropriate by the Secretary”.
 - a) What factors should be considered in the determination? Factors could include population of a Tribe, average cost of energy, and/or average cost of construction.
 - b) Should the allocation be similar to or different from the allocation of other federal programs (e.g., DOE’s Energy Efficiency Conservation Block Grant Program)?

- 14) For tribal program implementation, do Indian Tribes plan to administer the programs themselves or engage with 3rd-party support? What role could DOE play in supporting program implementation for Indian Tribes?

- 15) What barriers do Indian Tribes face to developing and implementing these programs (e.g., access to infrastructure, technology, or program implementers)? How can DOE help Indian Tribes overcome these barriers and support program efficiencies?

- 16) What best practices and lessons learned from other tribal efficiency or incentive programs should DOE consider in drafting program guidance?

Designing Programs for Maximum Impact

17) What evaluations of similar programs exist that can provide lessons learned and recommendations for effective program guidance, support, and best practices?

18) How should DOE, states, tribes, and territories measure success? Examples may include high customer satisfaction, measured or estimated benefits (e.g., impacts on energy, bills, emissions, health, or peak demand), quality job creation, valuation of home upgrades or overall efficiency, etc. What specific data is needed to evaluate progress toward these recommended metrics of success?

While impacts on energy bills and valuation of home upgrades on overall efficiency provide objective metrics for programmatic success, they can cause a strain on states with limited staffing capacity and add additional burden that is not necessary to measure program success. The DOE should consider several alternatives to measuring success such as implementing the rebates/incentives efficiently, continued market transformation, and equitable deployment. For instance, Maine would continue to focus on emissions reductions, fuel switching, and energy reduction/efficiency which is within the scope of existing legislative priorities. Flexibility in providing state success should be considered.

19) What data should program administrators and DOE collect throughout the program for the purposes of evaluation? What evaluation protocols should program administrators and DOE put into place before program implementation begins?

- a) How often should program administrators be required to evaluate program performance? How often should DOE evaluate the program?
- b) What specific data is needed to evaluate program success in reaching disadvantaged communities?

The DOE should consider high level and non-identifying geographic information (e.g., city/town, zip code, county), household demographics, and household characteristics (e.g., housing type, backup heating systems, etc.). DOE should ensure to balance data requirements with the burden of collecting this data by the states.

20) How should these programs be designed to spur durable market demand for efficient and electrified homes? How can program designs best assure continued funding and financing for home efficiency and electrification improvements even after these funds have been depleted?

The DOE should look to existing state implementors on common and durable equipment being installed (e.g., list of commonly installed heat pumps, weatherization materials with sound R-values, embodied carbon, etc.). Additionally, contractors and installers should be qualified through existing state implementors. Ensure a quality assurance visit after the measure has been installed which is paired with a brief energy audit and education materials for the household. Leverage/braid funding the help the funding go further.

21) Based on past successes, what practices and/or policies should program administrators use to drive higher energy savings per rebate dollar invested (e.g., measure bundling, order of installation, home characteristics, or sizing equipment after insulation/sealing)?

Ensure program participants are aware of and targeted for additional measures. This could be done with the provision of educational materials, a quality check after installation, or both. Install equipment appropriate for energy savings based on the home characteristics (e.g., proper sizing of heat pumps). This may result in the installation of multiple heat pumps which should be rebated appropriately.

22) Should program administrators establish set-asides or limits concerning the distribution of the rebates (e.g., bundled packages, disadvantaged communities, income or other definitions, incumbent heating fuel in the home, high-impact measures)?

Ensure states meet Justice 40 requirements, statutory income thresholds, and encourage further equity initiatives (e.g., BIPOC, Tribal Nations, etc.). Enable states to establish enhanced funding for vulnerable communities using established tools (e.g., CJEST).

23) What best practices, like bulk purchasing or bulk installation, should program administrators consider to reduce implementation costs for rebate recipients or to maximize the reach of program funding?

24) What practices should states, territories, and Indian Tribes include in program design to maximize uptake such as interim targets, incentives to contractors to install eligible equipment, or partnerships with for-profit, non-profit, or municipal entities)?

25) How can programs ensure effective consumer education and outreach?
What types of tools and/or materials should DOE develop to support consumers in understanding how to maximize the benefits of these programs?

26) What program design requirements are necessary to support increased investment in new business models, with the long-term goal of sustained financial and market investment and accelerated market adoption?

27) While the electrification rebates allow for application in both new construction and existing buildings, are certain uses more likely to deliver greater benefits? For example, should electrification rebates focus primarily on existing buildings where such improvements are less likely to happen without additional funds? Are there important other applications (e.g., new construction of affordable housing, other?)

Integrating Existing Incentives & Programs

28) How can DOE encourage program administrators to build on and coordinate these funds with existing networks and programs to maximize impact? Other programs may include state energy efficiency Revolving Loan Funds (RLF), utility energy efficiency programs, U.S. Department of Health & Human Services Low Income Home Energy Assistance Program (LIHEAP), Weatherization Assistance Program (WAP), tax incentives, among other funding sources.

- a) What guidance is needed from DOE to make this successful?
- b) How should DOE encourage program implementers to design and implement rebate programs to leverage other resources and/or provide seamless services (e.g., through housing finance agencies (HFAs), state RLFs, WAP, or other complementary programs)?
- c) What concerns and risks should DOE be aware of in introducing these programs into existing programs and networks? How can program administrators prevent the layering of federal, state, and local incentives whose combined value is greater than that of the product being purchased?

Each state will have unique characteristics that will be navigated to ensure programmatic success. Maine will utilize existing networks to achieve the shared desired outcomes that these programs seek to meet. This will necessitate coordinating the variety of federal programs available to each state. DOE should provide clarity on what programs/rebates/incentives can or cannot be combined as early as possible so that states may design these programs effectively.

- 29) What are potential barriers to effective program energy savings attribution? Are there best practices to address these barriers?
- 30) What safeguards can DOE and/or program administrators put in place to ensure that low-income households are optimally served through various available programs (e.g., Home Energy Rebates,
- 31) What safeguards can program administrators put in place to ensure local utility rebates and other local funding that existed before the Home Energy Rebates are not decreased in response to the availability of the Home Energy Rebates?

Opt-In Tools, Resources, Technical Assistance, and Partnerships

32) DOE may invest in tools and resources that states, territories, and Indian Tribes can elect to use to implement their programs. Program components could include (i) systems to track or process rebates, transactions, and improvements; (ii) systems to verify income eligibility; (iii) software to model and optimize savings; (iv) systems and/or forms for data collection; (v) model program templates program administrators can adopt in their application; (vi) stakeholder engagement guidance and resources; (vii) standardized datasets and APIs, and (viii) program marketing, education and branding.

- a) Which of these should be prioritized?
- b) Are other components needed?

33) What existing systems and tools can DOE, states, territories, Indian Tribes, program administrators, aggregators, and/or financiers leverage to implement the Home Energy Rebate programs?

Provide states with flexibility in using existing programmatic pathways.

34) Are there any program components that DOE should provide nationally to avoid duplication of effort and/or encourage consistency?

35) What types of support or technical assistance would be most useful for DOE to provide to states, territories, Indian Tribes, and other program administrators to assist in developing program applications as well as in implementation?

An online application portal would be helpful for people to access services; however, it is critical that the messaging be clear that each state will have nuances in their program structures to set proper expectations.

36) What qualities should DOE seek in selecting intermediary organizations (e.g., non-profit and community-based organizations) to provide technical assistance, including marketing, education, and outreach to program implementors and others? Examples of support could include help on designing effective programs, braiding funding resources, and ensuring marginalized groups benefit from the rebate programs.

Income Verification

37) What types of documentation should be considered sufficient for rebate applicants to demonstrate that they meet income eligibility requirements (e.g., prior year tax return, verification of other federal benefit program eligibility, or recent paystubs)?

- a) What are common barriers to effective income verification for LMI households and what industry practices are less effective or should be avoided?

Any of the above listed. Additionally, consider a letter from employer on business letterhead, payroll report from employer.

- b) How long should a household's determination of eligibility last?
- c) Are there examples of programs that have demonstrated high levels of compliance while allowing self-attestation to establish income eligibility?
- d) Some programs determine income eligibility by address, such as if 80 percent of more of the census tract has a certain income. What are the benefits and drawbacks of this approach?

Drawback may be someone inherited a property in the census tract but may not have the income from the census tract. Additionally, with states that are experiencing housing shortages/issues, valuation of homes can fluctuate very frequently.

- e) How can program administrators prevent duplicative document or verification requirements?

Allow categorical eligibility from a means tested program.

38) If DOE established a national income qualification system that program administrators could opt into using, what features would be most useful? What features would be duplicative of existing systems?

39) What are successful approaches for determining income qualification for a household in existing state and tribal programs?

Have a method to obtain information from relevant government agencies (e.g., DHHS).

- a) Are any of these applicable to varied levels of income (e.g., less than 80% area median income (AMI); 80-150% AMI)?
- b) Is it possible to easily modify existing approaches/tools to verify income at new levels (e.g., 80-150% AMI)?
- c) What eligibility criteria exist that DOE should consider as categorically eligible?
- d) Within existing multi-family programs, how is income verification required to be provided or confirmed by the building owner?

If the building is affordable or subsidized the owner/agent would have practices in place to obtain income verification on a schedule.

Estimating and Measuring Energy Savings

- 40) For the Home Efficiency Rebates, how should DOE support program implementers in selecting, developing and implementing the modeled and/or measured energy efficiency path? What factors will drive decisions to implement a modeled program, a measured program or both programs? Provide a system of support where requested (e.g., tools needed, technical assistance, etc.), but also allow states to use existing methods for this determination (e.g., technical resource manuals, deemed savings, etc.).
- 41) What have evaluations found to be key drivers of success in accurately modeling or predicting energy savings?
- 42) What recommended methodologies or standards could be used by states/programs to calculate energy savings and associated impacts, such as greenhouse gas emissions reductions? What software is used to implement that methodology? What are the key inputs and features?
- 43) What software tools provide any of the following capabilities?
- Energy usage calibration consistent with BPI 2400
 - Open-source advanced measurement and verification
 - Savings valuation based on time, location, or greenhouse gas emissions
 - Third-party certified documentation of the work scope and predicted impacts
 - Other capabilities of interest, including but not limited to use of standard data schemas (e.g., HPXML), application programming interfaces (API) integrability, etc.
- 44) Do you have any recommendations for applying BPI 2400 per the legal requirements of the Home Efficiency Rebates?
- 45) The Home Efficiency Rebates refer to savings based on “time, location, or greenhouse gas emissions.” Please provide input on best practices for calculating savings based on these factors. How should program administrators value these savings in comparison to homeowner energy usage and bill reductions?

Eligible Technologies for Rebates

46) How should DOE facilitate that clear information regarding qualifying technologies and projects is readily available to consumers, contractors, retailers, and other relevant stakeholders?

Have written standards established that can be tailored to a variety of different audiences (e.g., residential participants may not be familiar with specifications that contractors are familiar with).

47) The Home Electrification Rebates specifies that qualified electrification projects must include the purchase and installation of certain equipment or materials. Should other related improvements (e.g., smart thermostats, sensors and controls, LEDs) be allowable as part of a qualified electrification project for the purposes of calculating total project costs which can in turn affect the final rebate amount?

Yes. Technologies that reduce energy costs and burdens should be allowed.

48) Should rebates be allowed in instances where use of the rebate-eligible equipment or measure is already required by local code?

Yes. Requirements by local code does not assist with the cost of installation.

Data Access and Sharing

49) What should DOE consider when drafting energy usage data sharing guidelines?

50) What are best practices for minimizing the complications of data collection, allowing data sharing where needed, and ensuring data security? Is there an opportunity to build upon Green Button and Green Button Connect?

Compliance and Quality Assurance

51) How can program administrators track participation in rebate programs to protect against:

a) Double-dipping between various federally funded state and Tribal grant programs for the same upgrade

Shared federal database

b) Households receiving more funds than are allowable under the law

c) Contractors/installers purchasing equipment in a way that violates the prohibition of combining efficiency and electrification rebates

d) Claims for work not done

e) Improper installations

f) Ineligible products

g) Falsifying income eligibility

h) Other risks – please identify other risks

52) What types of quality assurance and/or quality control should DOE and program administrators require? What are recommendations for best practices?

Quality assurance inspections after the installation paired with an energy audit and education on other opportunities/rebates/incentives/etc. for the household.

53) What data should DOE and program administrators collect to ensure their ability to conduct effective quality assurance and/or quality control?

Job Creation & Quality

54) Which contractor and/or laborer credentials and/or certifications should DOE and/or program administrators require for work funded in part by these rebates?

QCI Certifications (BA-P, BA-T, HEP Retrofit Installer, HEP Crew Leader).

55) What practices are needed to ensure quality installations? Please provide examples of how existing efficiency or electrification programs track quality installations by contractor.

Quality assurance inspections after the installation paired with education on other opportunities/rebates/incentives/etc. for the household.

56) How can DOE assure that these rebates support quality construction jobs and quality non-construction jobs?

Quality assurance inspections after the installation paired with education on other opportunities/rebates/incentives/etc. for the household.

Buy America and Supply Chain Considerations

- 57) Which technologies, products, or materials could face barriers to deployment or accessibility due to cost premiums, supply chain constraints, or other production issues?
- 58) Are there approaches that program implementers can take to reduce supply chain constraints (e.g., bulk purchases, coordination with DOE manufacturing programs)?

Open Response

59) Is there anything else DOE should be aware of as it develops program design guidance and support for these rebate programs?

As stated throughout the response, providing states with maximum flexibility will drive the most success of this program. Utilizing existing and successful programmatic pathways will significantly streamline the program and reach the residential population efficiently and effectively. Clear education targeted to a variety of audiences in a variety of mediums will ensure the entire spectrum of program participants (e.g., state agencies, residents, contractors, implementors, etc.) will ensure the program success and increase awareness of existing programs available once the funds from this program run out. Residential education is crucial in this context – especially when considering how different programs can be used within the same dwelling. Data sharing will ensure continued programmatic success at the state level.

60) What evaluations, research, reports, or other resources can help inform DOE's program guidance?