Proposal for Request for Information on Inflation Reduction Act

DE-FOA-0002981

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Request for Information Categories and Questions

A. Respondent Contact Information (Q1)

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

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The Connecticut Department of Energy and Environmental Protection ("DEEP") and Connecticut electric and natural gas distribution companies, Eversource Energy (electric and gas) and AVANGRID (The United Illuminating Company, Connecticut Natural Gas, Southern Connecticut Gas), collectively, the "CT Utilities" or "CT Program Administrators" appreciate the opportunity to respond to the Department of Energy's ("DOE") questions regarding the agency's development of the Home Efficiency & Electrification Rebate Programs ("Home Energy Rebate programs"). The CT Utilities are the primary program administrators in Connecticut for energy efficiency and demand management.

DEEP and the CT Program Administrators look forward to working with DOE in the implementation of the Home Energy Rebate programs to help Connecticut residents save energy and money. Overall, we recommend, where possible, to provide flexibility to the states who have existing programs (e.g., Connecticut) to identify what criteria and processes can be leveraged to avoid customer confusion and reduce administrative efforts to qualify and process rebates offered through the Home Energy Rebate programs.

B. Accessible and Equitable Program Design (Q2-Q12)

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?

The DOE should recommend the following best practices for program administrators and stakeholders to use to ensure disadvantaged communities and low-income households are aware of and have easy access to the Home Energy Rebate programs:

- **Establish clear goals and metrics** to reach a certain percentage of communities and households.
- **Work with program administrators to leverage existing marketing efforts** to customers in distressed municipalities and to customers enrolled in arrearage forgiveness programs (e.g., matching payment plans, etc.).
- **Leverage program administrators' existing relationships and encourage new relationships with community action agencies and other agencies and entities** to promote the Home Energy Rebate programs alongside other energy efficiency programs, energy assistance programs (e.g., Operation Fuel), and social assistance programs (e.g., Supplemental Nutrition Assistance Program-SNAP).
- **Leverage existing and create new community partnership programs** that work with environmental justice communities, disadvantaged communities, and distressed municipalities, such as the CT Program Administrators' Community Partnership Initiative, to ensure equitable and inclusive program design and implementation. The Community Partnership Initiative leverages the experience, trusted relationships, and knowledge of local groups, municipalities and nonprofits to further energy adoption and educate residents and businesses on available energy efficiency solutions. Round 2 of the Community Partnership Initiative launched in December 2022, with a call for outreach projects planned for the coming year in distressed municipalities and communities with environmental justice census blocks.
- **Use relevant energy websites** (Connecticut: www.energizect.com) to market the Home Energy Rebate programs.
- **Leverage existing public relations, marketing, and communication platforms**.

- **Leverage and consider how to expand state level processes already in place.** The Home Energy Rebate programs' design, at the national level, should incorporate to the maximum extent practicable, flexibility on braiding funds, income verification, and point-of-sale determinations to better leverage state level processes already in place.

- **Initiate stakeholder engagement immediately.** Despite program guidance still being under development, the DOE should begin the process for stakeholder engagement as soon as possible. We recommend further engagement such as webinars to update stakeholders on the status of the guidance and what issues are still being discussed versus those that are resolved.

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 State of Connecticut has undertaken significant work to define equity and inclusion for purposes of its existing efficiency programs and is implementing new data gathering and tracking practices to establish baselines against which to measure required improvements. Where such work is already underway, DOE should allow states the flexibility to demonstrate how program planning and implementation aligns with Justice40 and meets the particular needs of that state. Any reporting requirements should be flexible enough to be adapted to individualized state approaches that align with Justice40.

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?*

State energy offices and program administrators can ensure that the above-referenced groups are meaningfully engaged by conducting intentional and inclusive stakeholder engagement focused on diversity, equity, and inclusion.

In Connecticut, the Connecticut Energy Efficiency Board ("EEB"), DEEP, and the CT program administrators have engaged a diversity, equity, and inclusion ("DEI") consultant as part of the EEB's technical consultant team ("EEB Technical Consultants"). This was a direct outcome of DEEP's Equitable Energy Efficiency (E3) proceeding launched on September 3, 2020. The goal of E3 is to define equity in the context of the state's ratepayer-funded C&LM programs, developing specific metrics to determine which customer demographics are underserved by the current programs, and expanding the inclusion and participation of individuals from underserved communities in those programs. The

CT Utilities who administer Connecticut's Conservation and Load Management ("C&LM") Plan and programs have equity goals for the 2022-2024 term. In 2023, we will continue to expand efforts in this area.

DEEP and the CT program administrators believe that the list of groups referenced above are appropriate, but perhaps not exhaustive. DEEP and the CT program administrators also routinely engage with the businesses and workforce that implement state energy efficiency program, because input from front-line workers who interact with customers in our communities is invaluable to program design and implementation. As noted in our response to question 2, we plan on leveraging DEEP's and the CT program administrators' existing relationships with community action agencies/community partner agencies to promote the Home Energy Rebate programs alongside other energy and social assistance programs. DOE should allow state energy offices and program administrators to leverage their experience, trusted relationships, and knowledge of local groups, municipalities, and nonprofits to further efficiency adoption and educate residents and businesses on available solutions. Connecticut's Community Partnership Initiative (administered by the CT Utilities) established this model to fund outreach projects planned in distressed municipalities and communities with environmental justice census blocks.

While it is essential 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 with the Home Energy Rebate programs, any DOE requirements for engagement should be high level enough to allow state energy offices to tailor their own engagement strategies. State energy offices, their program administrators, and community partners are uniquely qualified to design and implement stakeholder engagement efforts that address local needs. Requirements about engagement transparency and when in a process engagement should, at minimum occur, could be valuable requirements for DOE to establish.

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 Connecticut, the state's residential weatherization programs include air sealing, duct sealing, and the installation of energy-efficient measures to reduce energy use and costs. These services are included as part of the energy assessments which also identify additional energy-saving opportunities for customers, including insulation and heating, ventilation, and air conditioning ("HVAC") systems (e.g., heat pumps). Encouraging the installation of multiple measures, where applicable and cost effective, can increase benefits to the household. Connecticut also has a robust residential solar program, a shared clean energy facility program, and a battery storage program, all with goals for participation by LMI customers. All of these programs will combine with the Home Energy Rebate programs to provide a robust pathway to affordable home energy retrofits.

The Home Energy Rebate programs should use the DOE's Low-Income Energy Affordability Data ("LEAD") Tool to focus marketing efforts on areas with high energy burdens. DOE should also provide guidance on rent protection in low-to-moderate ("LMI") rental units to ensure that rents do not increase due to energy efficiency improvements for a reasonable number of years after receiving rebates. Additionally, to facilitate upgrades in multifamily buildings DOE should afford flexibility for state energy offices to allow rebates to be aggregated when the rebates apply to work benefitting building-wide systems (e.g., multiple $2,500 rebates should be permitted for electrical wiring work that serves multiple units within a multifamily building).

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?*

One best practice adopted by the CT program administrators is the use a mobile audit tool, like those used by Connecticut contractors in the state's weatherization program—Home Energy Solutions™. The Connecticut mobile audit tool includes an energy savings calculator, provides customers with energy-saving recommendations, and includes investment costs and payback. In Connecticut, all programs and savings are validated by third-party evaluators. Additionally, the CT program administrators maintain a Program Savings Document manual detailing current realization rates, energy-saving calculations, measure lives, and other energy efficiency measure inputs. The CT program administrators recommend DOE review their 2023 Program Savings Document manual, as well as the third-party evaluation findings for C&LM programs.

The CT program administrators will provide contractor training regarding the implementation of the Home Energy Rebate programs. Additionally, the state of Connecticut promotes the Connecticut Clean Heating and Cooling Calculator tool created by the Clean Energy States Alliance. This online tool allows customers to estimate the greenhouse gas emissions savings and potential costs savings from switching all or a portion of their home's heat from fuel oil, propane, natural gas, or electric baseboard to a clean heating and cooling solution (e.g., air source heat pumps, ground source heat pumps, solar hot water, and heat pump water heaters). The EnergizeCT website also promotes the Energize CT Heating Loan calculator, which allows customers and contractors to calculate energy and monetary savings from installing a high efficiency HVAC system. The DOE's guidance could allow states to use their own tool and/or a tool provided by DOE that is similar to what Connecticut already uses.

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

DOE could possibly recommend contract terms limiting rent increases as part of an owner's participation in the Home Energy Rebate programs. For example, in Connecticut, the Connecticut Children Medical Center's Healthy Homes Program provides qualified homeowners and tenants with inspections and plans for the removal of lead, asthma triggers, and safety hazards. The program also provides financial assistance for remediation, relocation assistance during construction, referrals to low-cost or no-cost weatherization programs to increase energy efficiency, and education pertaining to healthy and safe homes. This program has created contract terms for landlords, such as "cannot raise rents for the next three years", to receive assistance and funding.

DOE could also allow funds to be spent on educational material for owners and residents to inform them of benefits, maintenance requirements, and proper use of electric appliances such as heat pumps and induction stoves. We also recommend that DOE work with HUD to incorporate the use of available rebates into financing programs and other HUD offerings.

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?*

Most energy efficiency program administrators, including the CT Utilities, already have tracking and reporting systems that include the functionality to validate customer accounts, customer addresses, and other customer information. In Connecticut, the CT program administrators require landlord signatures, releases, and authorizations prior to a rental unit participating in an energy efficiency program. Program administrators could ensure proper rebate processing by offering customer/landlord authorized incentive payments to the contractor. We recommend DOE allow states to use existing systems already in place for rebate processing.

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

In Connecticut, the CT program administrators use several best practices to implement successful 'point of sale' rebates, including using third parties to facilitate payments directly to contractors/retailers. DEEP and the CT program administrators recommend DOE allow states to use any existing systems for point-of-sale rebates where possible.

In Connecticut, examples include online/electronic rebate application forms and the use of third-party rebate processors to review the application, eligible measures, product cost, and incentive amount. The CT program administrators' rebate process provides the payment directly to the customer or contractor (with proper customer authorization). However, contractors who provide direct install weatherization services (e.g., home energy assessments, air sealing, weatherization, lighting, and appliances) receive payments directly from the CT program administrators.

Point-of-sale rebates that require income verification could use a precertification system where customers receive a certificate that validates their income eligibility. This certificate could then be provided to their contractor or at the point of sale.

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

We recommend the following program design parameters for the Home Energy Rebate programs:

- **Automatically qualify tenants of federally subsidized, low-income housing**. Tenants of federally subsidized low-income housing typically meet the income threshold for current energy efficiency programs for low-income customers. This streamlines the qualification process.

- **Have landlords authorize building improvements.** It is important for program design to note that landlords may have to authorize building improvements.

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

We recommend the following quality control measures: contractor training, third-party inspections, and program evaluations. These measures ensure contractors practice safe and healthy homes best practices.

12. Which Home Energy Rebate program components across Sections 50121 (HEP based - whole house rebates) and 50122 (HE electric home rebate program) 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***

DEEP and the CT ratepayer-funded efficiency program administrators recommend that DOE give state program administrators the flexibility to implement various components of the Home Energy Rebate programs in a manner which aligns with existing programs. We recommend DOE combine the following Home Energy Rebate program components together:

- **Implement marketing, communications, and branding.** We recommend that states have the flexibility to combine marketing, communications and branding for the Home Energy Rebate programs. This will help to reduce customer confusion and rather than having two campaigns, customers who engage and inquire about one of the rebates can be directed to the program appropriate for them.

- **Income verification.** We recommend that states have the flexibility to combine the process for income verification.

- **Rebate processing.** We note that the High-Efficiency Electric Home Rebate program prohibits the overlapping of rebates with other federal funds. Therefore, joint rebate processing would facilitate better verification and quality control of this requirement.

- **Contractor requirements.** Contractor requirements should be based upon the discipline required to install the energy-efficient measure and receive the rebate. For example, the Building Performance Institute requires contractor certifications for weatherization measures being installed in single family or multifamily buildings. In Connecticut, the CT program administrators require certain certifications and requirements for contractors to be part of their Heat Pump Installer Network.

- **Home energy assessments.** DOE should give state program administrators the flexibility to use the

assessment tools and processes of existing energy efficiency programs.

- **Data collection and reporting.** The data collection and reporting for the Home Energy Rebate programs should be combined to streamline the process. The data and results should be reported together (e.g., measures installed, customers served, energy savings, etc.).

C. Additional Design Considerations Specific to Indian Tribes (Q13-Q16)

13. Funds reserved for Indian Tribes will be made available in "a manner determined appropriate by the Secretary". 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. 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)?

DEEP and the CT program administrators recommend that rebate qualifying criteria and contractor certifications align with state energy efficiency programs to reduce customer confusion and permit broader access and participation in both federal and state efficiency programs.

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?

If Indian Tribes should want to engage third-party support, the DOE should look first to coordinating with existing program administrators to leverage their programs, infrastructure, tracking and reporting systems, and expertise. In Connecticut, the CT energy efficiency program administrators could provide implementation support including allocating the rebates and incentives, providing assistance in program design and implementation (including coordinating administrative duties), and providing access to financing and/or loan loss guarantee.

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?

The DOE could help Indian Tribes overcome barriers to developing and implementing these programs by providing administration efforts to support the development of rebate applications, conduct application reviews, and coordinate with existing program administrators to leverage their programs, infrastructure, tracking and reporting systems, and expertise. In Connecticut, the CT energy efficiency program administrators are capable of providing third-party support to Indian Tribes.

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

The DOE should encourage tribal efficiency administrators to coordinate with the state program administrators. In some cases, state efficiency programs can provide access to existing infrastructure, technologies (i.e., tracking systems), and program implementors.

D. Designing Programs for Maximum Impact (Q17-Q27)

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

The Home Energy Rebate programs should be aligned with existing state efficiency programs, where applicable, to take advantage of evaluation learnings and program enhancements. Connecticut's efficiency program evaluations can be found at https://energizect.com/eeb-evaluation-reports-and-studies. DOE should provide clear guidance on how to braid IRA funds into existing state programs to allow for higher incentives per product, to increase the numbers of customers reached, to avoid duplicating efforts, and to ensure more incentives are delivered directly to customers. DOE should also clarify if, and how, IRA funds can be braided with any other federal funds such as Weatherization Assistance Program funding.

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?

The DOE should be flexible with measurement requirements and allow states to choose how they measure success. Some examples of how success could be measured are:

- Energy savings, in native and fuel-agnostic units (annual and lifetime).
- Number of participants.
- Greenhouse gas reductions (carbon dioxide, nitrous oxides, sulfur oxides, and chlorofluorocarbons).
- Health benefits.

- Creation of jobs.
- Customer bill savings.
- Benefit-cost ratio (societal perspective).

Collecting and reporting the following specific data is recommended to evaluate success:

- Billing data.
- Number of participants.
- Program spending.
- Energy savings (e.g., reductions in kilowatt-hours, gallons of oil, ccf/therm, pounds or gallons of propane, MMBtus, and DOE Home Energy Scores).

The DOE may also consider asking program administrators to survey participants regarding their comfort and satisfaction after participating in the program.

We note that DOE will need to provide clear and flexible guidance to program administrators regarding the collection, storage, and the transfer of data to DOE as states, Indian Tribes, and other jurisdictions must comply with varying federal, state, and/or utility laws and policies regarding the handling of Personal Protected Information ("PPI"). This includes securely storing contact information of Home Energy Rebate program participants and contractors, including PPI.

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?

DOE should require program administrators to report program participation and expected savings on a quarterly basis. Additionally, DOE should take advantage of existing state evaluation processes and studies and should evaluate the Home Energy Rebates program every three years. See our response to question 18.

b. What specific data is needed to evaluate program success in reaching disadvantaged communities?

The following specific data is needed to evaluate program success in reaching disadvantaged communities:

- Customer demographic information and residence location.
- Confirmation on the definition of disadvantaged communities (Justice40, etc.), coupled with tracking of dollars spent and numbers of measures installed, by type, in those areas.
- Rental status and/or primary language data may also be useful proxies for certain disadvantaged communities.

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 design of the Home Energy Rebate programs should be aligned with existing state energy efficiency programs so that when funding goes away, they can be transitioned to core state energy efficiency programs. This transition could be accomplished by providing the Home Energy Rebate programs funding to the states to braid and layer into their existing program structures, where possible, using their own systems and tools. DEEP and the CT energy efficiency program administrators recommend DOE allow rebate program administrators the flexibility to design rebate delivery structures that will provide contractor network and market predictability. To accomplish this, some jurisdictions may choose to implement declining rebate blocks or to maintain consistent rebate levels year-to-year.

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)?

We think the program administrators could use comprehensive measure incentives (i.e., bonuses or higher incentives if they combine multiple measures in one project) to promote measure bundling and higher energy savings. This encourages contractors and consumers to do more than they may have originally planned.

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)?

DOE should allow program administrators to pay higher rebates (up to 100 percent of the project costs) and other special terms (e.g., cover costs for barrier remediation such as knob & tube wiring, asbestos, etc.) for income qualified customers. DOE may want to allow varying rebates based on existing fuel types (for example, higher incentives to reduce the dependence on oil). Providing a premium rebate for disadvantaged communities also aligns price signals to contractors and customers with marketing to these same communities. Any set-asides for disadvantaged communities should be based on the proportion of disadvantaged customers in the state.

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?

For the Home Energy Rebate programs, program administrators should not be required to conduct bulk purchasing or bulk installations as this can create risk should the equipment purchased not match the need. However, certain programs may be able to mitigate this risk and therefore it should be permitted as an option/approach. No matter the approach, it is recommended that DOE and the program administrators provide broad notice to manufacturers to expect increased demand from the program.

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)?

Program administrators should leverage the expertise, trust, pre-existing relationships and new develop new relationships with community-based organizations to maximize uptake. Additional practices should include establishing savings targets/ home (i.e., MMBtu/home) and partnering with existing energy program administrators. DOE should leverage the experience, trusted relationships, and knowledge of local groups, municipalities, and nonprofits to further efficiency adoption and educate residents and businesses on available solutions. Connecticut's Community Partnership Initiative (administered by the CT Utilities) established this model of establishing targets and local partnerships to fund outreach projects planned in distressed municipalities and communities with environmental justice census blocks. Flexibility to use funds for contractor incentives for measure bundles or referrals to other programs/offerings could also help encourage more comprehensive measures.

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?

Connecticut's ratepayer-funded efficiency programs already leverage existing federal education and outreach materials, including the DOE Home Energy Score and Report, as well as the DOE and EPA ENERGY STAR websites which let consumers know what qualified equipment exists. As programs are finalized, DOE could ensure that existing federal education materials/websites are updated to include the latest information. In addition, we see a need for two tools:

- **Income qualification tool.** For income qualification, we recommend that a tool be developed that automatically evaluates a customer's income and qualifies a customer based on various state and federal program income criteria to streamline the qualification process. This would include state median income ("SMI"-60 percent in Connecticut), area median income ("AMI"-80 percent, 150 percent) and the federal poverty level ("FPL"). The income qualification tool should have the ability to generate a certificate or QR code for use when accessing federal rebates that require precertification. It would be helpful to have an address sent to DOE where DOE can return a flag on whether it is a disadvantaged area or Indian Tribal area. Alternatively, to reduce administration costs, flexibility can be made so if a customer qualifies for a Home Energy Rebate program, they automatically qualify for the state's energy efficiency programs and vice-versa.

- **Rebate availability/awareness tool.** To make customers aware of rebates and their availability, we recommend that an online tool or database be developed where an interested customer can easily enter some basic information (e.g., estimated income level and a few home characteristics) to inform a menu of, filterable, potentially available energy rebates, incentives, and financing offerings available to them through federal, state, and local programs. This tool could help customers to identify incentive stacks and/or measure groupings that will maximize benefits to them. Due to the jurisdiction-specific nature of this tool and the likely need for frequent program offering updates, we recommend that funding be made available for states to create and maintain this type of tool. If these tools are developed, use of the tools should be optional for states to allow for flexibility in implementation and use of existing tools developed for current efficiency 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?

An income qualification tool as described in question 25 above could be used by states, community action agencies, and utilities beyond the energy efficiency programs contemplated by IRA. The income qualification tool could potentially help facilitate the qualification of customers for other energy assistance or support programs. When designing the Home Energy Rebate programs, DOE should align with state energy efficiency program administrators from both a certification and implementation perspective.

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?)

The CT program administrators recommend rebates focus on, but not be limited to, existing buildings where the cost to replace existing inefficient equipment creates a greater financial hurdle. Electrification is more cost effective in new construction, however multifamily and affordable housing new construction likely would benefit from incentives to encourage full electrification. Any upfront cost hurdle is difficult to overcome without incentives, especially for disadvantaged communities.

E. Integrating Existing Incentives & Programs (Q28-Q31)

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?

To make this program successful, DOE should provide rebate and program requirement flexibility to permit coordination and braiding of funding with existing state energy efficiency programs. DOE will also need to clearly state how projects in municipalities and/or areas not covered by existing state energy efficiency programs should be funded and supported. Guidance on how the Home Energy Rebate programs can be layered with the Weatherization Assistance Program will also be especially helpful and necessary.

Home Energy Rebate programs' eligibility requirements should be aligned with state efficiency programs. Additionally, existing program administrators should have the flexibility to qualify customers for the Home Energy Rebate programs based on state efficiency program eligibility requirements. For example, in Connecticut, the income eligibility for the low-income programs is 60 percent of SMI compared to federal guidelines requiring 80 percent of AMI. A customer who qualifies for the Connecticut low-income program should also be eligible for the similar Home Energy Rebates program. It would be helpful if DOE was able to allow states to use census tract data and/or a self-attestation to qualify those who are deemed eligible at 60 percent of SMI per existing eligibility practices for eligibility at 80 percent AMI.

To maximize beneficial program impacts, Connecticut is already exploring layering rebate funds with other funding sources to provide comprehensive energy upgrades beyond what is allowed with the Home Energy Rebates program alone. We envision that it will offer a simple, easy to use web-based tool to residents that will allow them to view the funding stacks for which they may be eligible. To further simplify the braiding and layering of funds, and to make these efforts more practical for states to implement, DOE should allow states the flexibility to align rules and requirements with state program criteria relating to energy efficiency to permit rebate stacking and minimize customer confusion. For example, equipment requirements, contractor certification requirements, income verification requirements, and rebate processing and data reporting requirements for the Home Energy Rebate programs should be flexible enough to easily align with existing state energy efficiency programs and processes.

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)?

Please see the response to question 28 (a). Connecticut already leverages its Home Energy Solutions-Income Eligible program (low-income program) with the federal Weatherization Assistance Program. For existing partnerships, the CT Program Administrators would continue to coordinate with the state agencies responsible for managing state and federal programs (i.e., DEEP, CT Department of Social Services, etc.). Connecticut has been a leader in the deployment of the DOE Home Energy Score and recommends the use of the DOE Home Energy Score to satisfy the modeling requirement in the Home Energy Performance-Based, Whole-House Rebates program. The use of the DOE Home Energy Score would allow the CT Program Administrators to leverage their training and workforce development efforts already undertaken in Connecticut and reenforce home labeling using a national based score.

Program guidelines, especially those pertaining to leveraging existing state programs and initiatives, should be

customer side focused, and flexible enough to allow states to create a simple, convenient, and seamless experience.

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?

DOE should be aware of the different eligibility requirements and application processes for existing efficiency programs and networks. The Home Energy Rebate programs should be designed with the flexibility to align eligibility and implementation requirements with existing efficiency programs. This will enable the program administrators to offer seamless services.

DEEP and the CT Program Administrators recommend that DOE establish combined caps (state energy efficiency + federal IRA) for efficiency measures that cannot exceed a 100 percent total project costs. The CT Program Administrators use their tracking systems and third-party fulfillment vendors to identify duplicate rebates.

29. What are potential barriers to effective program energy savings attribution? Are there best practices to address these barriers?

The energy savings claimed by the CT Program Administrators are based on the current Connecticut Program Savings Document manual (2023 Program Savings Document manual). The Program Savings Document manual is based on third-party evaluation studies and is approved by DEEP on an annual basis.

For the Home Energy Rebate programs, the CT Program Administrators would use the Program Savings Document manual and third-party studies to help claim energy savings. This is similar to their process for claiming energy savings through the Weatherization Assistance Program and for the American Resource & Recovery Act ("ARRA") funding. For reporting purposes, the same savings will be reported to the DOE.

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, WAP, or other low-income weatherization programs)?

The following safeguards are best practices that can help ensure low-income households are optimally served through various programs:

- For comprehensive projects, state programs can be supplemented with appropriate federal funding. For example, a project that included multiple measures (e.g., heat pumps, heat pump water heaters, insulation,

and windows) would have a portion of the costs covered by IRA funding to allow for more comprehensive energy projects or for more homes to be able to participate. DOE should ensure that federal funding is used to either make projects more comprehensive or to serve more customers by requiring tracking and reporting of sustained, existing state energy efficiency program funding and delivery during the Home Energy Rebate program period."

- Providing funding for health and safety weatherization barrier remediation.

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?

The state program administrators should put the following safeguards in place to ensure funding for energy efficiency programs is not decreased as a result of the Home Energy Rebates program.

IRA funding should supplement, not supplant existing local/state funding and/or rebates, and DOE should allow this to occur through higher incentives per measure (than existing state programs) or more homes being served, than through the current state programs. Where state incentives already cover a significant percentage of the cost of a measure, allowing them to be reduced when combined with IRA incentives would allow more homes to be served. State incentives should certainly be reduced where they would exceed the cost of a measure when coupled with IRA incentives. DOE should also allow states the flexibility to adjust rebates based on program evaluations, code changes, and market transformation.

F. Opt-In Tools, Resources, Technical Assistance, and Partnerships (Q32-Q36)

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?

The Home Energy Rebate programs' components should be prioritized in this order:

- ***(viii) program marketing, education and branding*****.** This would include customer-facing tools, applications, etc. because it would be helpful to have consistent marketing messages across all states to reduce confusion.
- ***(vi) stakeholder engagement guidance and resources*** to ensure consistent messages across all states to reduce confusion.
- ***(i) systems to track or process rebates, transactions, and improvements*****.** If the current program administrators (e.g., utilities, state and others) are not the efficiency rebate processors. However, the CT Utilities have these systems and would prefer to use their existing approach as much as possible.
- ***(iv) systems and/or forms for data collection*****.** These systems should be used for: (1) IRA reporting and (2) modifications would be needed to existing data tracking systems for IRA funded measures.
- ***(v) Model program templates program administrators can adopt in their application systems to verify income eligibility.***
- ***(vii) standardized datasets and APIs.***

b. Are any of these not needed?

The following program component is not needed:

- ***(iii)–software to model and optimize savings*****.** Instead of funding this program component, DOE should allow for the use of current program administrators' existing tools, tracking systems, and contractor mobile apps. This allows more IRA funding to be spent on customer incentives and less on administrative tasks.

c. Are other components needed?

We recommend a component that gives current program administrators the ability to upload data from existing systems for DOE reporting rather than manual data entry.

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?

The DOE can use existing current program administrators' tracking and reporting systems, rebate forms, contractor audit tools, and financing tools to implement the Home Energy Rebate programs. The CT Program Administrators already have these existing systems and tools in place.

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

Please see our responses to questions 28, 32, and 33. In addition to the state's program savings document/technical reference manual, DOE may also consider allowing the Program Administrators to use the DOE Home Energy Score and Report for the modeled savings path.

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?

The following types of support or technical assistance would be useful for DOE to provide:

- Work with existing program administrators of energy efficiency programs and/or any other assistance programs (Weatherization Assistance Partnership, Operation Fuel, etc.).
- Simple ways to model savings for qualification/application submissions.
- A hotline for the program administrators to call DOE for assistance regarding the Home Energy Rebate programs.
- Online training or a frequently asked questions ("FAQs") for the Home Energy Rebate programs should be made available to program administrators. In Connecticut, the CT Program Administrators' staff answer customer questions regarding Connecticut's energy efficiency programs through the efficiency hotline (877-

WISE-USE). The online training and FAQs would ensure they are properly prepared to answer questions regarding both Connecticut's energy efficiency programs and the Home Energy Rebate programs.

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.

It would be best practice for DOE to seek the following qualities in selecting intermediary organizations to provide technical assistance to program implementers and others:

- Staff experience.
- Successful program history of meeting goals, objectives, etc.
- Financial stability.
- Ability to ramp up resources (larger firms).

G. Income Verification (Q37-Q39)

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?

Differences in eligibility requirements across federal, state and local programs can cause barriers to effective income verification.

b. How long should a household's determination of eligibility last?

Program administrators should be permitted to align a household's determination of eligibility with other existing state programs or with existing federal program such as the Weatherization Assistance Program.

c. *Are there examples of programs that have demonstrated high levels of compliance while allowing self-attestation to establish income eligibility?*

Self-attestation could be combined with census tract data to determine eligibility in disadvantaged communities. 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?

We recommend the development of a streamlined income verification tool that could provide both accuracy and efficiency (see response to question 25 above). However, efficient but less accurate methods such as census tract-level eligibility could be successful in Connecticut.

d. *How can program administrators prevent duplicative document or verification requirements?*

The CT Utilities currently use 60 percent SMI as the threshold for income eligible programs. We would like DOE to give states the flexibility to maintain this consistent approach across energy efficiency and energy assistance programs to avoid complication and burden to an already-disadvantaged population. In addition, we recommend that self-attestation and census tracts also be utilized.

DOE should provide a high degree of flexibility to states and allow them to determine what documentation is necessary to demonstrate a customer's eligibility. Connecticut, along with other states, is actively exploring the use of customer participation in other low-income programs for determining program eligibility. This will significantly decrease the need for documentation and will alleviate some of the administrative burden associated with income verification. DOE requirements for income verification should not go beyond what are considered minimum standards for customer eligibility.

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?*

We think the following are useful/necessary features and items for a national income qualification system:

- The ability to generate a certificate or QR code for use across multiple income qualifying programs and identifies the various income qualifying criteria the customer meets.
- Up-to-date database of income qualification guidelines across local, state, and federal programs.

- Data sharing authorization by potential program participants.
- Data sharing agreements between relevant entities.
- Easy access on a variety of devices (e.g., smartphone, laptop, tablet, telephone call).
- American Disability Act ("ADA") compliant.
- Ability to interface with existing customer-facing tools to notify them of qualification status.

39. Ability to interface with tools and applications used by state programs. What are successful approaches for determining income qualification for a household in existing state and tribal programs?

Connecticut has had success qualifying program participants based on other programs that previously qualified the customer.

a. Are any of these applicable to varied levels of income (e.g., less than 80% area median income (AMI); 80-150% AMI)?

Connecticut does not have existing energy efficiency programs that qualify program participants as moderate income. Connecticut's energy efficiency programs only differentiate between low-income (defined as 60 percent or less of SMI) and market-rate participants.

b. Is it possible to easily modify existing approaches/tools to verify income at new levels (e.g., 80-150% AMI)?

In general, it is easier to change existing tools and processes than to change the required income qualification criteria of an existing program. Therefore, a tool that can verify income at a variety of levels would be most valuable.

c. What eligibility criteria exist that DOE should consider as categorically eligible?

The CT Utilities currently use 60 percent SMI as the threshold for their income eligible, energy efficiency, payment plan, and assistance programs. We would like DOE to allow us the flexibility to maintain this consistent approach across our programs to avoid complication and burden to an already-disadvantaged population.

d. Within existing multi-family programs, how is income verification required to be provided or confirmed by the building owner?

In Connecticut's energy efficiency programs, large multifamily buildings (5+ units) are income qualified via affidavit with records on file that 66 percent of the building tenants qualify. For small multifamily buildings, an affidavit with records on file that one-half or two-thirds of the building's tenants qualify based on income is used (for 2 units, 50 percent of the units must be low-income, for 3 units 66 percent must qualify, for 4 units 50 percent of units must qualify, etc.).

H. Estimating and Measuring Energy Savings (Q40-Q45)

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?

In the CT Program Administrators' experience, both modeled and measured savings paths are difficult and costly to implement on a project-by-project basis. In Connecticut, where there is a significant share of delivered fuels for heating, obtaining delivered fuels information is very difficult and therefore makes it difficult to calculate total home consumption reductions. Additionally, it is costly because it requires more time for savings analysis.

The CT Program Administrators' experience with modeling software for their new construction program has been that the modeling requires an experienced professional and can be costly. Creating the flexibility to use the current DOE Home Energy Score to satisfy the modeling requirement can utilize a workforce that has already been trained and thus can be deployed more quickly and efficiently. The CT Program Administrators' experience also has indicated that the DOE Home Energy Score can be deployed at a significantly lower cost than many of the modeling software utilized commercially. Furthermore, the DOE Home Energy Score evaluates the energy efficiency of the building versus the usage of the buildings. This provides greater equity to customers as usage modeling tends to penalize customers who can't afford to maintain their homes temperature (i.e., it will be more difficult to achieve the 20 percent savings).

The CT Program Administrators rely on their current Program Savings Document manual that is based on modeled and evaluated savings. We would like to continue using the Program Savings Document manual as the basis of savings for the modeled savings path. We would like the flexibility to define average consumption (by home type, home size, fuels) to determine the percent savings for the rebate levels.

41. What have evaluations found to be key drivers of success in accurately modeling or predicting energy savings?

The CT Program Administrators use the current Program Savings Document to incorporate previous study results and stay current with the latest evaluations. For example, in Connecticut, a separate evaluation team annually reviews the Program Savings Document to make sure it is current and applicable. The savings for projects installed are based on the current filed Program Savings Document manual which is filed annually with DEEP. The studies used incorporate approved evaluation processes on sample projects and then are applied to programs/projects at scale on a measure-by-measure basis.

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?

The DOE should provide flexibility to allow state program administrators to use tools and methods currently in place and that have proven to be successful. Conversion factors based on previous studies and/evaluations, Independent System Operator-New England ("ISO-NE") Marginal Emissions that are specific to the generation system characteristics and dispatch order in the state.

43. What software tools provide any of the following capabilities?

i. Energy usage calibration consistent with BPI 2400

The CT Program Administrators use prescriptive savings based on the current Program Savings Document manual which is updated based on third-party evaluation findings and filed annually with DEEP. Also, the CT Program Administrators uses the DOE Home Energy Score on applicable homes. Please note that the CT Administrators' models are not consistent with BPI-2400.

ii. Open-source advanced measurement and verification

The CT Program Administrators do not use open-source advanced M&V models for measurement.

iii. Savings valuation based on time, location, or greenhouse gas emissions

No response.

iv. Third-party certified documentation of the work scope and predicted impacts

No response.

v. Other capabilities of interest, including but not limited to use of standard data schemas (e.g., HPXML), application programming interfaces (API) integrability, etc.

No response.

44. Do you have any recommendations for applying BPI 2400 per the legal requirements of the Home Efficiency Rebates?

No. Alternatively, allow the use of prescriptive engineering calculations and the DOE Home Energy Score. The CT Program Administrators use the Program Savings Document manual which is based on evaluations, including impact evaluations and modeled savings. We believe these estimates could be made more granular through modeling to be consistent with BPI 2400 if some flexibility is allowed.

We recommend that DOE provides guidance and flexibility of how to handle projects if information on certain fuels used by the home (e.g., delivered fuels) is not available. As noted above, we believe a simplified table is needed to answer this question. For example, if the delivered fuel data is not available, does that mean that a project cannot move forward if all fuels are not included in the calculation?

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?

Best practices include modeling the generation dispatch differences based on specific hourly load impacts from the measure installed. Utility system planners and other program administrators should be able to create hourly greenhouse gas emissions saving using their own system planning models for specific times and locations.

I. Eligible Technologies for Rebates (Q46-Q50)

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

DOE should update its webpages with easy-to-understand and generic information regarding the Home Energy Rebate programs. These webpages should use a straightforward standard such as the ENERGY STAR website. The webpages should have minimum information requirements available to be put on state sites (i.e., EnergizeCT). Have DOE site link to state sites, and possibly have the ability for state sites to link back to the DOE website to make information transparent to customers. The DOE website would have overview and generic information. Each state

site would have specific information for participation.

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, additional items such as smart thermostats, sensors and controls, light-emitting diodes ("LEDs") should be allowed as part of a qualified electrification project.

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

Yes, for a retrofit, but not for new construction or renovation where meeting code is already required.

J. Data Access and Sharing (Q49-50)

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

DOE should consider specific state and federal laws requiring customer privacy. Also in CT, Green Button is for customers to download their own data and the Green Button Connect is not set up. Additional funding would be required to facilitate data sharing with third parties. Green Button only allows for natural gas and electricity data, but about 60 percent of Connecticut residents either use fuel oil or propane for heating. We recommend allowing states the flexibility to determine the best way to share data.

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?

Best practices include the use of secured data sharing protocols, such as secure file transfers (e.g., SFTP sites, Acelerion, etc.). The CT Program Administrators, for example, have Green Button so customers can download their utility data. However, the CT Program Administrators have not implemented the Green Button Connect feature and would require additional funding for set up. This still does not account for the 60 percent of Connecticut residents who heat with delivered fuels, such as propane or fuel oil.

K. Compliance and Quality Assurance (Q51-Q53)

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

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

Customers would need to provide full disclosure on all funding sources. Customers would not be allowed to get duplicate federal funding but would be able to braid federal funding with state energy efficiency funds.

- ***Households receiving more funds than are allowable under the law***

DOE could consider including project caps on rebate application forms and/or ensuring that rebate application forms could automatically tally multiple rebates and flag any errors.

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

Clear program rules and clear form applications with calculators and disclaimers can help to limit funding combination violations. Random Inspections (after the fact) are also a best practice. If one program administrator administers both programs, they will have to update their systems to ensure the rebates work as required by law (e.g., no double dipping on same measure).

- ***Claims for work not done***

DOE could consider paying the customer (vs. the contractor).

- ***Improper installations***

Inspections of a sample (i.e., 5 percent) by a third party prior to payment is best practice. DOE should allow states the flexibility to have inspection samples be commensurate with existing program protocols, where possible.

- ***Ineligible products***

The DOE should require inspections prior to payment to catch ineligible products/measures. The CT Program Administrators use third-party inspectors and Qualified Product Lists.

- ***Falsifying income eligibility***

The DOE should consider including prosecution language in the Home Energy Rebate program forms.

- ***Other risks – please identify other risks***

The DOE should consider other risks, such as contractors falsifying rebate applications and municipal utilities that may not participate in state regulated energy efficiency programs and program delivery mechanisms.

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

The CT Program Administrators have specific quality control requirements focused on items such as safety, customer satisfaction, and inspections on measure installations. These quality control requirements are already in place and the CT Program Administrators are constantly improving their quality control processes/procedures. It is best practice to ensure installers have the certifications and licensure necessary to complete work, use a qualified product list when applicable, ensure that installers practice good customer service by reviewing online ratings, and review installers' Quality Assurance Plans to determine if they are actively reviewing their employees' work to meet standards.

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

It is best practice to ensure installers have the certifications and licensure necessary to complete work, utilize qualified installers list when practicable, ensure that installers practice good customer service by reviewing online ratings, and review installers' Quality Assurance Plans to determine if they are actively reviewing their employees' work to meet standards.

If required by DOE, customers will need to be informed that they may be subject to third-party inspections to verify the installation of equipment or other services provided. The third-party inspectors may need to verify the customer name, address, contact information, measures installed, and date of service/installation.

L. Job Creation & Quality (Q54-Q56)

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?

It would be best practice for DOE to give state program administrators the flexibility to align contractor and/or laborer credentials and certifications with that state's existing efficiency program requirements. These could include certifications from the Building Performance Institute for weatherization work or custom criteria established to access rebates and promote the quality installation of heat pumps such as what was developed for the CT Program

Administrators' Heat Pump Installer Network.

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

The CT Program Administrators use third-party quality control contractors to perform inspections on a sample of projects completed by each contractor for each program. The data collected is tracked and used to provide feedback to installation and implementation contractors for both disciplinary actions and to improve program performance.

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

No response.

M. Buy America and Supply Chain Considerations (Q57-Q58)

57. Which technologies, products, or materials could face barriers to deployment or accessibility due to cost premiums, supply chain constraints, or other production issues?

The CT Program Administrators believe that the ductless heat pump mini splits will be in high demand for the High Efficiency Electrification program. These technologies could face barriers to deployment and accessibility as most ductless heat pump mini splits are manufactured in Japan (though some US facilities do exist).

58. Are there approaches that program implementers can take to reduce supply chain constraints (e.g., bulk purchases, coordination with DOE manufacturing programs)?

The CT Program Administrators suggest coordinating with DOE manufacturing programs to reduce supply chain constraints. It may make sense for DOE to meet with manufacturers and make them aware of the Home Energy Rebate programs so manufacturers can plan for high demand.

N. Open Response (Q59-Q60)

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

A key aspect to program design is the need to provide customers with clear up-front information regarding what incentives are available to their project. Customers need to be able to make decisions on whether to move forward with a project by understanding at the outset what incentive(s) will be available. Therefore, contractors need to be

able to utilize a modeling tool in the field that can provide an immediate or quickly available estimate of energy savings and incentive amounts in order to provide decision-making information to customers. The tools currently being used in Connecticut do not provide a comparison to the customer's energy usage/spending for all fuels (i.e., does not provide the ability to generate savings as a percent of energy usage). This is especially challenging for customers using delivered fuels.

DOE should provide flexibility to states that have already made extensive investments in program design, software systems, market awareness and evaluation of savings results. If a state is utilizing a successful framework of evaluated energy savings that framework should be able to continue regardless of whether it is based on a modeled, measured, or similar approach.

DOE should keep in mind that additional layers of complication related to software and modeling can add cost and administrative burden without necessarily adding more value to the customer or resulting in broader adoption of energy efficiency measures. Of course, an aggregate level of accuracy in energy savings is important in order to determine whether funds are achieving their intended results. The CT Program Administrators contend that in states that have been operating for years with a robust evaluation, measurement and verification (EM&V) framework and regular regulatory review of program savings, that existing approaches provide appropriate savings. While new tools and approaches can be provided for review and consideration on whether they may provide improved customer experience or cost savings, flexibility to determine which approach is best for program participants and program efficiency and accuracy should be provided.

Key points:

DOE should provide clear guidance on how to braid IRA funds into existing state programs and with federal funds to allow for higher incentives per product, to increase the number of customers reached, to avoid duplicative efforts, and to ensure more incentives can be delivered directly to customers.

DOE should provide pathways for state program administrators to maintain income eligibility approaches across existing state energy efficiency programs to avoid complications and burdens for an already-disadvantaged population.

We strongly recommend flexibility within the modeled savings path to use evaluated, prescriptive savings methodologies from programs with average home consumption used to calculate rebate levels to reduce the administrative barriers in program implementation and savings calculations. If desired by a state, DOE should allow

for non-competitive selection of existing energy program administrators to administer Home Energy Rebate program funds.

DEEP looks forward to working with various stakeholders including the Connecticut Energy Efficiency Board, energy efficiency program administrators (including utilities, contractors, nonprofits), local, state and federal officials, members of the public, and more to coordinate and implement the Home Energy Rebate programs. DEEP may also explore other options to maximize the impact of these rebate programs by working in concert with the Weatherization Assistance Program, municipal utilities, and, potentially, other program administrators as needed.

DEEP would also like to express our support for, and agreement with the RFI responses submitted by the National Association of State Energy Offices (NASEO), the Northeast States for Coordinated Air Use Management (NESCAUM), and the Northeast Energy Efficiency Partnership (NEEP).

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

The CT Program Administrators recommend DOE review Connecticut's 2023 Program Savings Document manual, the Equitable Energy Efficiency (E3) proceeding, as well as the third-party evaluation findings for Connecticut's C&LM programs.