



Home Efficiency Rebates Program: Sample Application Responses and Guidance

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Contents

Introduction	2
Home Efficiency Rebates State Programs (Sec. 50121)	3
Use of Funds and Rebate Eligibility	3
Section 3.1.1 Use of Funds.....	3
Section 3.1.2: Rebate Conditions and Levels	8
Section 3.1.3: Low-Income Homes.....	17
Section 3.1.4: Community Benefits Plan.....	29
Section 3.1.5: Processing and Delivering Rebate Funds to Eligible Rebate Recipients.....	31
Section 3.1.6: Data Collection and Evaluation.....	33
Consumer Experience	37
Section 3.2.1: Outreach and Education Strategy	37
Section 3.2.2: Home Assessments	37
Section 3.2.3: Access to Residential Utility Data.....	39
Section 3.2.4: Project-Specific Energy Savings Calculations	39
Section 3.2.4.1: Calculating Modeled Energy Savings.....	40
Section 3.2.4.2: Calculating Measured Energy Savings	45
Section 3.2.5: Consumer Protection through Quality Assurance	49
Section 3.2.6: Post-Installation Certificate	49
Maximizing Rebate Impact.....	51
Section 3.3.1: Supporting the Clean Energy Economy Through Market Transformation.....	51
Section 3.3.2: Integrating with Other Programs.....	51
Section 3.3.3: Quick Starts	55
Appendix	56
Home Efficiency Rebates.....	56
Measured and Modeled Rebate Levels.....	56
Federal Programs Approved for Categorical Eligibility	58

Introduction

This document provides example responses and additional guidance to assist a state/territory¹ in applying for and implementing the Inflation Reduction Act (IRA) Home Rebate Program(s) in accordance with the requirements of the Administrative and Legal Requirements Document and the [Program Requirements & Application Instructions](#).²

- Applicants are **not** required to use this document. It is intended to serve as a useful starting point for applicants to frame their responses reflecting the U.S. Department of Energy (DOE) program requirements.
- States **are** encouraged to modify the sample responses as needed to describe their intended approach.
- Where needed, additional guidance is provided in footnotes as well as in text that appears in [SMALL CAPS](#).
- Note that certain terms, such as “implementation contractor,” are used frequently in the sample responses. In some, but not all, cases for the sake of brevity, the responses include alternatives such as “other entities.” However, it should be clear that states are not expected to use implementation contractors and/or many other specifics noted in the sample responses. A state should ensure that their applications/responses accurately reflect their proposed approach.
- This document provides example responses to all questions; however, states – NOT requesting consideration as a “quick-start” program – may elect to defer responding to specific questions as noted in the application (see [Program Requirements & Application Instructions](#) document Tables 8, 10, and 11). A State Implementation Blueprint must be submitted after receipt of the award and a minimum of 60 days prior to planned program launch. DOE will provide the state feedback and approval to proceed. States must receive DOE approval on the State Implementation Blueprint before launching their program.
- Applicants can also find other helpful resources and recommended approaches on the [Recommendations for Home Energy Rebate Program Administrators webpage](#).

¹ State and Territorial Energy Offices are eligible to apply for funds to offer rebates under Sections 50121 and 50122. The term “state” used throughout this document refers to any State or Territorial Energy Office applying to offer these rebates.

² Full Home Energy Rebate Program Funds Administrative and Legal Requirements Document (ALRD)–Issued July 27, 2023. Last updated October 13, 2023.

Home Efficiency Rebates State Programs (Sec. 50121)

Use of Funds and Rebate Eligibility

Section 3.1.1 Use of Funds

1. Provide which types of allowable costs the state proposes within each category of **administrative funds** and **rebate funds** and within those categories:

Note: These responses should correspond with the Standard Form 424, Standard Form 424A, and [Budget Justification Workbook](#).

Please note that “rebate funds” indicate the remaining amount of grant funds after subtracting “administrative funds”.

[ENTER STATE NAME] plans to use **administrative funds** to cover the following types of activities:

- Program planning and design [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state will contract with an organization with expertise in designing and delivering efficiency programs, with proven success in market uptake, sound installations, income verification, and delivering benefits to low-income households. Depending on the initial organization’s experience reaching disadvantaged communities, the state may contract with another organization better suited to addressing this need.
- State program staff [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state plans to hire [ENTER NUMBER: X] full time staff members, with the intent that their time will be split amongst the Home Efficiency (Sec. 50121) and Home Electrification and Appliance (Sec. 50122) awards. Our accounting systems have the ability to separately track these different funding sources and internal policies are in place to ensure the time is accurately tracked.
- Development of tools and systems, including websites, applications, rebate processing, and reporting [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state plans to fund a program implementer or a separate qualified entity to develop user interfaces and systems for households, contractors, and others to use to apply for rebates, submit required documentation, etc., including income verification.
 - Depending on the interest of other state agencies with low-income programs, the state may also fund an IT firm to develop an application programming interface (API) that allows several low-income programs to automatically share information regarding their enrollees, thereby substantially expediting income verification.
- Program evaluation and consumer satisfaction surveys [ENTER TOTAL \$X OR \$X PER PROJECT]

- Depending on availability of resources, the state will conduct focus groups and/or consumer surveys to assess the effectiveness of program outreach and delivery, and satisfaction with rebates and products.
- Program monitoring and audits [ENTER TOTAL \$X OR \$X PER PROJECT]
 - In addition to state staff monitoring program delivery and overseeing the implementation contractor(s), the state may require outside assistance to respond to state or federal inquiries. The implementation contractor(s) and other providers (e.g., income verification services) will also be required to fulfill data reporting and analysis per the contract(s).
- Consumer protection functions including resolution procedures, data review, contractor management, installation standards, and continuous improvement [ENTER TOTAL \$X OR \$X PER PROJECT]
 - In response to findings from periodic assessments of program performance (as well as any identified problems that arise throughout implementation), the state or its implementation contractor(s) will institute changes to address deficiencies in program delivery (or design).
 - The state will develop consumer protection guides or one-pagers that will be provided to all rebate applicants as one part of the consumer protection strategy.
 - The state will also either create a separate hotline or dedicate state staff to respond to consumer questions and/or complaints.
 - State staff will fulfill contractor management needs with regular reviews of program implementer/other contractor data submissions.
- Marketing, education, and outreach, including the funding of local governments and place-based organizations to assist with these activities [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state [CHOOSE ONE: WILL HOLD/HAS HELD] [ENTER NUMBER: X] community engagement session(s) to better understand community interests and inform the program design.
 - The state will conduct separate outreach to retailers, product manufacturers and distributors.
 - The state, potentially with assistance from its implementation contractors or outside experts and partners, will develop marketing and education information for homeowners, tenants, retailers, contractors, and others as needed.
- Implementation contract cost not including rebates and costs for activities directly related to delivery of rebates [ENTER TOTAL \$X OR \$X PER PROJECT]

- The implementation contractor(s) will use administrative funds for data review and reporting, and to fulfill other programmatic management requirements.
 - State oversight of implementation contractor and other service provider costs/contract management; data review and reporting.
- Contractor training [ENTER TOTAL \$X OR \$X PER PROJECT]
 - Contractor training and/or review of a contractor's certification(s) will be required before a contractor is placed on the qualified contractor list.
 - Training specifically to assist contractors in participating in the rebate program.
- Activities to improve access to rebates, facilitating leverage of private funds and financing mechanisms (e.g., loan loss reserves, interest rate reductions) where beneficial to efficiency and/or electrification projects. [ENTER TOTAL \$X OR \$X PER PROJECT]
 - Depending on availability of resources, the state will engage financing organizations (e.g., green banks) to assist in making low-cost financing (or other incentives including the potential to establish and apply loan loss reserves) available to rebate applicants and providers (e.g., contractors).
- Technical assistance [ENTER TOTAL \$X OR \$X PER PROJECT]
 - Depending on availability of resources, the state and/or its implementation contractor(s) may provide technical assistance either directly or through specialized organizations to assist entities focused on serving disadvantaged communities and/or other priorities.

The state certifies that costs will not be duplicated on the Home Electrification & Appliance Rebates award (Section 50122), or other awards, and are not duplicative from costs captured in the Indirect Rates.

The state plans to use **rebate funds** to cover the following types of activities:

- Rebates for whole-home energy efficiency projects
- Disadvantaged community incentives [ENTER TOTAL \$X OR \$X PER PROJECT] [PROVIDE ADDITIONAL INFORMATION IN RESPONSE TO QUESTION #2]; and,
- The proposed set of activities listed in the response to question #2. [ENTER TOTAL \$X OR \$X PER PROJECT]

- a. Provide the total amount of estimated administrative funds to be expended annually:

[CHOOSE ONE OF THE FOLLOWING:

OPTION 1: ENTER \$X BASED ON 20% OR LESS OF THE STATE'S REBATE FUNDS FOR HOME EFFICIENCY REBATE FUNDS DIVIDED BY THE EXPECTED NUMBER OF YEARS FOR PROGRAM IMPLEMENTATION (NO GREATER THAN 8 YEARS)

OR

OPTION 2: PROVIDE A FORECAST OF EXPECTED ADMINISTRATIVE COSTS EACH YEAR OF THE PROGRAM IMPLEMENTATION IF IT IS NOT EXPECTED TO BE THE SAME EACH YEAR. WHEN FORECASTING COSTS, CONSIDER THAT THERE MAY BE ADDITIONAL UPFRONT STARTUP COSTS THAT WILL NOT PERSIST THROUGH THE DURATION OF THE PROGRAM, AND THAT THE 20% MAXIMUM IS A CAP THAT APPLIES OVER THE DURATION OF THE ENTIRE PROGRAM (NOT EACH YEAR).]

- b. Provide the total amount of estimated project-related costs as a portion of the rebate funds to be expended annually:

[ESTIMATE THE % OF REBATE FUNDS THAT WILL BE APPLIED TO PROJECT-RELATED COSTS EACH YEAR. IN ESTIMATING THIS %, DO NOT INCLUDE ANY PROJECT-RELATED EXPENSES THAT WILL BE BORNE BY OTHERS (NOT THE STATE).

THIS SHOULD CORRELATE AND ALIGN WITH THE REBATE DELIVERY FUNDS JUSTIFICATION TAB OF THE [BUDGET JUSTIFICATION WORKBOOK](#).]

2. If requesting additional rebate funds for project-related activities, describe and justify each activity and associated budget in the budget justification worksheet.

[DESCRIBE PROJECT-RELATED COSTS THAT THE STATE PROPOSES (SUBJECT TO DOE APPROVAL) TO PAY FOR WITH HOME EFFICIENCY REBATE FUNDS.

- ALL PROPOSED ACTIVITIES MUST FALL UNDER ONE OF THE 8 CATEGORIES LISTED IN THE REBATE DELIVERY FUNDS JUSTIFICATION TAB OF THE [BUDGET JUSTIFICATION WORKBOOK](#).
- FOR THE PURPOSES OF THIS SAMPLE RESPONSE, EACH OF THE 8 CATEGORIES ARE LISTED BELOW; HOWEVER, ONLY INCLUDE THOSE CATEGORIES THAT YOUR STATE INTENDS TO CARRY OUT WITH REBATE FUNDS.
- FOR EACH RELEVANT CATEGORY PROVIDE:
 - ANTICIPATED SPENDING LEVEL (EITHER \$ TOTAL OR \$ PER PROJECT)
 - DESCRIPTION OF THE PROPOSED WORK; AND
 - JUSTIFICATION (FOR EXAMPLE, HAVE YOU EXPLORED OTHER OPTIONS FOR SUPPORTING THESE ACTIVITIES SUCH AS LEVERAGING INCENTIVES AND/OR INFRASTRUCTURE OF EXISTING PROGRAMS (E.G., QUALIFIED CONTRACTOR LISTS, ASSESSMENTS, QUALITY ASSURANCE).
- ONLY INCLUDE PROJECT-RELATED COSTS PROPOSED TO BE PAID FOR WITH REBATE FUNDING. DO NOT INCLUDE ANY PROJECT-RELATED COSTS THAT WILL BE PAID BY HOUSEHOLDS OR OTHERS.]

The state would like to request using **rebate funds** to cover the following types of project-related activities (as applicable):

- Equipment, tools, models, and procedures used to assess a home and estimate energy savings [ENTER TOTAL \$X OR \$X PER PROJECT]

- Equipment, tools, models, and procedures used to verify installations and perform quality control (QC) including inspections and reporting [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state needs to procure [ENTER SPECIFIC TYPE OF EQUIPMENT] to verify quality installation...
- Customer service support [ENTER TOTAL \$X OR \$X PER PROJECT]
- Consumer protection functions including consumer feedback, project verification and inspections [ENTER TOTAL \$X OR \$X PER PROJECT]
- Income Eligibility [ENTER TOTAL \$X OR \$X PER PROJECT]
 - Depending on the level of interest of other agencies with low-income programs in our state, the state would like to fund the development and use of an API that can allow automated look-up of enrollees in programs that provide categorical eligibility. This could dramatically reduce the time and effort associated with income verification as well as the possibility of granting rebates to ineligible applicants.
 - The state would like to set aside funds in the event that carrying out income verification is more costly than anticipated OR if a greater percentage of applications require review due to higher levels of falsified applications.
- Disadvantaged community delivery, including targeted marketing and outreach [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state would like to provide individualized assistance to households in disadvantaged communities if warranted, depending on the uptake of rebates in these areas.
- Disadvantaged community incentives (see Section 3.1.4) [ENTER TOTAL \$X OR \$X PER PROJECT]
 - Given the state's goal of delivering [ENTER NUMBER: X%] of rebates to low-income households in disadvantaged communities, the state may require as much as [ENTER TOTAL \$X OR \$X PER PROJECT] for installer incentives.
- Integration with existing programs, home energy assessments, and project scoping [ENTER TOTAL \$X OR \$X PER PROJECT]

3. Describe how the state will manage and ensure that rebate minimums and administrative maximums are adhered to over the duration of the program.

[STATES SHOULD PROVIDE DETAILS ON BUDGETING AND FORECASTING TOOLS, PROCESS CONTROLS, WHAT SYSTEMS STATES INTEND TO USE (E.G., WILL BE USING DOE'S API), HOW SYSTEMS BEING DEVELOPED WILL ASSIGN REBATES AMOUNTS TO PRODUCTS AND HOW SYSTEMS WILL TRACK ADMINISTRATIVE COSTS AND REBATE FUNDS EXPENDED.]

Administrative Efficiencies

The state will take a number of steps to reduce the costs of administration and project-related activities. The state plans to use the [DOE Rebate Tracking System](#) to

minimize the costs of data tracking and reporting. By making use of the Tracking System's API (available to states, vendors, modeling tools, etc.), the state will dramatically reduce the need for repeated data entry and associated errors, and simultaneously ensure much greater data consistency through the use of the DOE/Pacific Northwest National Laboratory (PNNL) data specifications.

The state will also investigate systems that can use "smart" technology to automatically read uploaded documents for income verification and/or other purposes. For example, the state would like to use a system (if not cost-prohibitive) that accurately reads the applicant's information including address on enrollment cards from various categorically-eligible programs.

In terms of ensuring that administrative limits are maintained, the state will closely track and report spending both within this category as well as funds that are provided as rebates and as incentives to contractors. The state will also follow Generally Accepted Accounting Principles (GAAP) and conduct audits every X years through the subcontractor [ENTER NAME]. [DESCRIBE YOUR ACCOUNTING PRACTICES IN 1-2 SENTENCES].

Rebate Funds Management

The state will use the DOE Rebate Tracking System and its accompanying coupon feature to ensure that rebate amounts comply with program requirements. Rebate applicants will only be approved for the rebate amounts (and percentages) associated with their income level (e.g., below 80% AMI) and the modeled or measured savings associated with allowable improvements. The DOE Rebate Tracking System will include a database with records of all previously issued rebates to individual residential dwellings. In order for a coupon to be generated, the system will query the database to ensure that a Home Efficiency Rebate has not already been redeemed for that address or that a non-expired coupon is still in place for that address.

The state will also use the DOE Rebate Tracking System to track the amount of rebate funds committed to date, and only approve new requests for rebates if sufficient funds remain. When the system issues a coupon, it will simultaneously put into place a "reservation" of funds (equivalent to predicted value of that coupon) that will remain in place until either the coupon is redeemed or the coupon expires, whichever is first. The state also plans to establish reserves within the DOE Rebate Tracking System to ensure that sufficient funds are in place (and maintained) for specific uses (e.g., minimum of 50% of rebate funds for low-income, with at least 10% for low-income multifamily).

Section 3.1.2: Rebate Conditions and Levels

4. Provide the maximum rebate amounts that will be offered within the allowances of the Home Efficiency Rebates requirements. (See [Tables A-1 and A-2 in the Appendix](#))

*States may increase the maximum amount available for low-income households upon approval from DOE.

[NOTE: THIS QUESTION REQUIRES A RESPONSE FOR HOUSEHOLDS WITH INCOMES GREATER THAN 80% AMI ONLY. PROVIDE INFORMATION REGARDING REBATE LEVELS FOR HOUSEHOLDS WITH INCOMES LESS THAN 80% AMI IN RESPONSE TO QUESTION #12.

[INCLUDE RESPONSES FOR EITHER OR BOTH MODELED AND MEASURED, DEPENDING ON YOUR STATE'S INTENDED PATH(S).]

IF USING THE MODELED APPROACH:

For households with incomes greater than 80% AMI, our state will use the maximum levels noted in [Appendix Tables A-1 and A-2](#). See our response to Question #12 for information on rebate maximums available to households with incomes less than 80% AMI.

IF USING THE MEASURED APPROACH:

For households with incomes greater than 80% AMI, the rebate per dwelling unit will be limited to [ENTER NUMBER: \$X]. See our response to Question #12 for information on rebate maximums available to households with incomes less than 80% AMI.

5. Identify the allowable project costs for determining rebate levels when based on project cost.

☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD BE CONSISTENT WITH JUSTIFICATION WORKBOOK FOR PROJECT RELATED COSTS. COSTS THAT ARE DEFINED AS PROJECT COSTS AND ARE INCLUDED AS PART OF CALCULATION FOR THE REBATE AMOUNT CANNOT ALSO BE DEFINED AS PROJECT RELATED COSTS. FOR EXAMPLE, IF A STATE DECIDES THAT THE HOUSEHOLD WILL BEAR THE COST FOR THE HOME ASSESSMENT, IT IS INCLUDED AS PART OF THE PROJECT COST. IF THE STATE DECIDES TO USE A PORTION OF REBATE FUNDS TO COVER THE COST OF THE HOME ASSESSMENT ON BEHALF OF THE HOUSEHOLD, THAT COST CANNOT BE INCLUDED AS A PROJECT COST AND CANNOT BE A PART OF THE REBATE CALCULATION.]

Allowable project costs include all energy efficiency improvements (equipment and installation/labor) associated with the anticipated energy savings. For households with incomes less than 80% AMI, allowable project costs may also include related project costs (e.g., home assessments, energy audits, and project quality assurance) given that low-income households will not be able to pay for these additional requirements and do not have access to other programmatic resources to cover these costs.

6. List the documentation requirements related to project costs from residents, building owners, contractors, and/or aggregators.

☐ Defer response to State Implementation Blueprint

For each project, the contractor or eligible entity representative (EER) must provide an invoice with the following information:

- Line item costs of equipment and materials
- Labor costs
- Model numbers for heating, cooling, and hot water systems (if geo-coded photos of installations include model numbers, that is acceptable)
- Labor costs of the specific work performed
- The address where the work was performed
- The name and contact information for the contractor(s) performing the work
- The dates on which the work was performed
- The total project cost prior to the rebate and the rebate amount
- Line item costs for any assessments, inspections, testing, and/or modeling
- Other project costs (if applicable, e.g., permitting)

The invoice must be signed and dated by the homeowner or building owner and must include rebates applied to the bill.

7. Describe how homeowners and multifamily building owners will be informed of additional program funding available from non-federal funds and grants.

☐ Defer response to State Implementation Blueprint.

As part of the state's outreach plan, the state will alert customers that other funding may be available through utilities or other state programs. The state will add this to our "Be a Smart Consumer" packet that contractors will be required to provide prior to commencing work. The packet will include links to relevant utility programs, rebate finders, web sites and/or call centers. The state also plans to send the packet electronically to the homeowner or building owner when the contractor initiates the rebate request prior to commencing work. The state plans to reach out to other relevant organizations (e.g., utilities) to conduct joint or coordinated communications and outreach where possible.

8. Provide the date after which upgrade projects must be completed for the purposes of being eligible for a rebate under the state program.

☐ Defer response to State Implementation Blueprint.

For projects initiated after the state's program launch, the contractor or aggregator must apply to be reimbursed for the rebate deducted at point of sale/installation (or rebate amount associated with measured savings) not less than [ENTER LENGTH OF TIME (E.G., 30 DAYS, 60 DAYS)] prior to the expiration date listed on the rebate coupon. The contractor/aggregator applying for reimbursement will be required to submit all information noted in the [Data & Tools Requirements Guide](#) (e.g., final SOW, signed invoice with detailed costs and deducted rebate amount.)

Households that apply to receive a rebate for a home upgrade completed that began on or after August 16, 2022, but initiated before the state's program launch, are subject to all program requirements. They will be required to provide all

information noted in the Data & Tools Requirements Guide (e.g., final SOW, signed invoice with detailed costs) as well as documentation certifying and demonstrating that the upgrade project meets all program requirements, including the use of a contractor on the state's qualified contractor list, assessment requirements, etc.

9. Identify whether, for low-income multifamily buildings, the state will calculate the "per dwelling unit" rebate amount at the less than 80% AMI amount for all units or based on the ratio of low-income to non-low-income units. [\[SELECT ONE\]](#)
- ☐ At the less than 80% AMI amount for all units
- ☐ Based on the ratio of low-income to non-low-income units
10. Describe how the state plans to value energy savings based on time, location, or greenhouse gas emissions. The application must demonstrate a strategy for either prioritizing, or requiring in program rules:
- a. Retrofits that will have a disproportionate benefit based on the time or location of energy savings; or
- b. A targeted approach to prioritize reduction in greenhouse gas emissions.
- ☐ Defer response to State Implementation Blueprint.

[\[WHEN CONSIDERING VALUATION OF THE TIME AND LOCATION OF ENERGY SAVINGS, STATES ARE ENCOURAGED TO COORDINATE WITH THEIR UTILITIES TO UNDERSTAND UTILITY SYSTEM NEEDS AND HOW MODELED AND MEASURED PROGRAMS CAN SUPPORT THESE NEEDS. FOR EXAMPLE, A REGION WITH A TRANSMISSION CONSTRAINT MAY BE PRIORITIZED OVER OTHER REGIONS. FOR STATES WHERE UTILITIES RUN TIME-OF-USE OR PEAK RATE STRUCTURES, STATES MAY BE ABLE TO ESTIMATE ADDITIONAL BILLS SAVINGS FOR HOUSEHOLDS. WHEN CONSIDERING THE VALUATION OF GREENHOUSE GAS EMISSIONS, STATES SHOULD ALIGN PROGRAM PRIORITIES WITH STATE AND LOCAL POLICIES AND ALSO IDENTIFY HOW POLICIES QUANTIFY AND REPORT GHG SAVINGS.\]](#)

The state will work with a subject matter expert (e.g., consulting firm, national laboratory) to value energy savings based on time, location, and/or greenhouse gas emissions (GHGs). More specifically, this valuation will consider the likely impacts of individual technologies/improvements and packages of improvements on greenhouse gas reductions and improved reliability. The subject matter expert will rely on the following resources to develop the state's valuation method:

- Technical assistance from NREL/DOE to apply the NREL/DOE IRA Home Energy Rebate Scenario Tool and forecast greenhouse gas emission implications of different improvements
- NREL's State Level Residential Building Stock; and,
- NREL/DOE Energy Efficiency & Electrification Packages Analysis.

The state will use this valuation method and findings in the following ways:

- Depending on scope of the valuation method, the state will apply the valuation method to estimate non-energy benefits (e.g., reductions in GHGs; increased grid reliability) associated with rebate investments.
- The state will instruct contractors to prioritize and integrate improvements that have the most significant impacts on greenhouse gas reductions and/or grid reliability into their scopes of work where feasible and sensible (e.g., not cost-prohibitive, improvement measure does not lead to higher energy bills). As part of our review of all contractors' scopes of work, the state will track how often these recommended measures are integrated in their projects. If less than 50% of a contractor's projects include such measures, the state will contact them to understand why that is the case and instruct them to change their practices if warranted. The state will only contact those contractors that have completed [ENTER NUMBER: X] or more projects in that year.
- If utilities offer time-of-day rates, the state will include information on peak pricing in the "Be a Smart Consumer" packet and explain that specific improvements (based on the valuation analysis) may lead to greater reductions in energy bills.
- Finally, the state will evaluate whether to apply this valuation to the savings calculation associated with a project. Per the DOE requirements, all projects will be required to meet the minimum savings thresholds based on energy savings alone. However, if the state determines that this valuation of benefits (e.g., GHGs, grid reliability, time of use pricing impacts) should be accounted for, the state will provide a formula or other specific method for contractors to apply to their modeled savings estimates and/or the evaluation of measured savings.

11. Describe how the state plans to ensure and verify ENERGY STAR certification at the time of installation for heating, cooling, and water heating products.

The state will require installers to include model numbers and geo-coded photos for all heating, cooling, and water heating projects. The state will then review this information to ensure that equipment complies with requirements. Upon review, if an installer installs equipment that is not ENERGY STAR certified, they will receive a warning notice. If they install non-qualifying equipment a second time, the state will remove the installer from the qualified contractor list.

The state also plans to ensure that major distributors and retailers understand the rebate requirements and ask them to refer to the EPA's Qualified Products Lists on a regular basis or, preferably, have an automated method of keeping the information up to date through a link to EPA's Qualified Products Lists if available.

12. A state interested in offering higher rebates amounts than those listed in [Table A-1 and Table A-2 in the Appendix](#) for low-income households must describe (in the below box) the state approach for balancing higher rebate amounts (serving fewer households) with the required allocation to serve low-income households and must propose the maximum

rebate amount that would be available to low-income households both in terms of percentage of project cost and dollar amount for low-income households.

[IF YOUR STATE IS **NOT** PROPOSING TO RAISE REBATE LEVELS (FOR LOW-INCOME) ABOVE THOSE LISTED IN TABLE A-1 AND A-2 IN THE APPENDIX, SIMPLY NOTE THAT AS YOUR RESPONSE AND CONTINUE WITH QUESTION 13.

IF YOUR STATE IS PROPOSING HIGHER LEVELS, RESPOND TO ALL ELEMENTS OF THIS QUESTION.

RESPONSES SHOULD BE CONSISTENT WITH THE STATE'S INPUTS IN THE BUDGET JUSTIFICATION WORKBOOK, TAB "G. OTHER".]

The state is proposing higher allowable rebates for low-income households subject to DOE approval. For projects in low-income single and multifamily buildings, with modeled savings between 20% to 34%, the state plans to allow the lesser of the following per home or unit.

- % of project cost:

- \$ amount:

For projects in low-income single and multifamily buildings, with modeled of at least 35%, the state plans to allow the lesser of the following per home or unit.

- % of project cost:

- \$ amount for low-income household:

Our rationale in offering higher rebate amounts is that households with incomes below 80% AMI will not be able to afford to cover any additional costs. The IRA-suggested limits are too low to cover a project that must reach at least 20% energy savings. Our state does not want to place additional burdens on low-income households and therefore wants to allow rebates to cover 100% of the costs. Contractors and the selected program implementer will be required to consider options for braiding the rebates with other allowable incentives; where braiding is available, the rebates would not need to cover 100% of costs.

The state has placed a cap of \$16,000 per low-income household that reaches at least a 35% energy savings. If every Home Efficiency Project applied this ceiling, it would translate to half as many comparable projects (since IRA proposed \$8,000 for low-income households on projects with at least 35% savings). The state does not expect that this would be the case since many non-low-income households will want to avail themselves of these rebates.

The state is particularly interested in Home Efficiency Rebates being practical for low-income households given that they likely live in homes where whole-home retrofits can save a lot of energy and reduce utility bills. By raising these limits for

low-income households, the state is making our rebate program a viable source of incentives for households who otherwise would likely be unable to carry out these projects.

The state is not providing these higher rebate levels for measured savings projects because the state wants the higher rebate levels to go directly to the household at the point of installation rather than split with the contractor (who will receive any excess rebate funds associated with savings in excess of the predicted savings). For measured savings projects, rebates to contractors will be capped at \$8,000 for improvements to homes with household income less than 80% and capped at \$4,000 for other improvements to all other homes, even if measured savings are more than the percentage associated with \$8,000 or \$4,000 respectively.

13. Provide details on what portion(s) of the total rebate will be provided to the homeowner/building owner compared with the contractor/aggregator.

☐ Defer response to State Implementation Blueprint.

[DEPENDING ON WHETHER A STATE IS USING MODELED, MEASURED, OR BOTH APPROACHES, THE FOLLOWING TYPES OF RESPONSES ARE APPROPRIATE:]

FOR MODELED AND MEASURED:

Consistent with the DOE/PNNL workflows, the contractor will be required to deduct the rebate amount associated with the modeled energy savings projected when initiating the rebate reservation. The rebated amount must be included on the invoice that the homeowner must sign before the contractor/aggregator can receive the rebate reimbursement.

FOR MEASURED ONLY:

As with modeled savings, the rebated amount provided to the homeowner must reflect the predicted energy savings submitted when the contractor initiates the coupon request. The contractor/aggregator must submit an invoice that is signed by the homeowner and includes the rebated amount before the contractor/aggregator can receive the rebate reimbursement.

In the case of measured savings, the rebate provided to the contractor/aggregator reflects measured savings rather than predicted savings; and, therefore this amount may be less or more than the rebated amount provided to the homeowner. This places a risk/reward on the contractor/aggregator.

The state will take steps to ensure that contractors/aggregators do not grossly underpredict savings and then qualify for much larger rebate reimbursements if significantly higher savings are measured after a year. Every six months, the state will compare a contractor/aggregator's savings estimates with measured savings and issue warnings to contractors/aggregators that consistently underestimate savings. Over the next six months, if estimates continue to be significantly lower in comparison to measured savings the contractor/aggregator will be taken off the state's qualified contractors list. Any savings discrepancy greater than the following will be considered unacceptable: More than [ENTER NUMBER: X%] percent savings

difference in more than [ENTER NUMBER: X%] percent of projects OR more than [ENTER NUMBER: X%] percent difference in savings for the portfolio of projects.

- a. Describe what caps the state will place on contractor/aggregators in terms of savings exceeding the amount associated with the rebate provided to the homeowner (e.g., allowable percentage above the rebate provided to homeowner).

☐ Defer response to State Implementation Blueprint.

The state is aware that if not checked, contractors using the measured approach will in some instances provide a lower rebate at point of retrofit than the contractor/aggregator receives in reimbursement once savings are measured (should measured savings exceed the original estimated savings). On the other hand, measured savings in some instances will likely be lower than the original estimated savings and then the contractor/aggregator will receive a lower reimbursement than provided to the homeowner.

While the contractor/aggregator needs some incentive to take on this risk as well as float the rebate provided to the homeowner for at least 12 months, the state will not allow the contractor/aggregator to receive unreasonably high reimbursements relative to the rebates provide to the homeowner. Specifically, the state will cap "additional" savings to the contractor/aggregator at 20% beyond the original rebate request. This will either be done on a portfolio basis or for individual projects depending on how the contractor/aggregator submits measured savings data for reimbursement. As an example of applying this to an individual home retrofit project, if a contractor predicts savings associated with a rebate of \$3,000, then the state's reimbursement to the contractor would be limited to 20% more than \$3,000. Given that 20% of \$3,000 is \$600, the cap in this case would be \$3,600 even if the home's measured savings corresponded to an even higher rebate (e.g., \$4,000).

This cap and the corrective action described in the prior response are intended to prevent contractors from being overcompensated for this risk on a portfolio basis. The state may impose stricter standards if warranted given misalignment of rebates to homeowners or building owners and rebate reimbursements to contractors/aggregators. If a contractor/aggregator exceeds a cap threshold for a portfolio of [ENTER NUMBER: X] homes or more in any given year and therefore is consistently receiving 20% greater rebate reimbursement compared the rebate provided to homeowners, the above process will be put in place to remove contractors and aggregators from qualified lists for no less than [ENTER NUMBER: X MONTHS/YEAR(S)].

14. Describe what systems will be put into place to reserve funds for each measured project, given the need to remit payment to the contractor/aggregator after 9-12 months of usage data post-energy upgrade is available.

☐ Defer response to State Implementation Blueprint.

[IF APPLYING FOR ONLY THE MODELED PROGRAM PATH, RESPOND WITH N/A.]

Our state plans to use the DOE/PNNL workflows and [DOE Rebate Tracking System](#). By tracking remitted rebate payments as well as rebate reservations for each home, the system will not allow oversubscription of rebates when "reservations" of rebates are still pending. The state will require contractors/aggregators to submit required information within 15 months of the rebate reservation. After this point, the rebate reservation will expire, and the contractor/aggregator will no longer be eligible for the rebate reimbursement.

15. For the measured program path, describe how the state will calculate rebate levels based on average home energy usage in the state.³

☐ Defer response to State Implementation Blueprint.

[IF APPLYING FOR ONLY THE MODELED PROGRAM PATH, RESPOND WITH N/A.]

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state is in the process of calculating the average home energy use in our state's single family and multifamily buildings (per unit in multifamily buildings). Once the state has that information, the state will set \$2,000 as the rebate associated with a 20% savings for non-low-income households and \$4,000 as the rebate associated with 20% savings for a low-income household. Then, the state will determine what this translates to in dollar per kilowatt hour saved or kilowatt hour equivalent saved to establish the rebate amount for savings at each percent point above 15% (the required minimum savings allowed).

OR

[OPTION 2:] The state will be using the calculator tool being provided by DOE to calculate the payment rates.

16. For the measured program path, within what timeframe will the state provide rebates to eligible rebate recipients?

☐ Defer response to State Implementation Blueprint.

Consistent with the DOE/PNNL workflows, the state will require contractors/aggregators to deduct the rebate at the point of installation. The rebate amount will be associated with the savings projection provided by the contractor/aggregator when making the rebate reservation. The contractor/aggregator will have 15 months after the date of the rebate reservation to submit all required documentation. The state will remit payment within 4 weeks of receipt of documentation if it meets requirements. If the documentation is insufficient, the state will notify the contractor/aggregator and request any outstanding information.

³ Per statute, the measured energy saving of the home or portfolio of homes must achieve 15% savings, but the calculation of the rebate is based on a 20% reduction of average energy use of a home in the state.

Section 3.1.3: Low-Income Homes

Note: Low-income households are defined as households with less than 80% Area Median Income (AMI). HUD calculates median family income levels for areas across the U.S. HUD has a website available [here](#) where users can view these calculations. Information about HUD's methods for calculating AMI statistics is available [here](#). HUD typically updates these values in March or April of each year. (see the [Program Requirements & Application Instructions](#) document Section 2.1)

17. What portion of the rebate funds will the state reserve for low-income households and multi-family households?

The state plans to allocate a minimum of [ENTER NUMBER: X%] of rebate funds to low-income households (i.e., households with less than 80% of AMI). This is consistent with (or greater than) the percentage of low-income households in our state, which is [ENTER NUMBER: X%].

The state plans to allocate a minimum of [ENTER NUMBER NO LESS THAN 10%] of rebate funds to low-income multifamily buildings.

[NOTE: IF THE STATE PLANS TO ALLOW BOTH MODELED AND MEASURED APPROACHES AND WOULD LIKE TO HAVE DIFFERENT ALLOCATIONS DEPENDING ON THE APPROACH, THE RESPONSE SHOULD SPECIFY THOSE AMOUNTS. IF THE ALLOCATIONS ARE MEANT TO BE OVER THE ENTIRE PORTFOLIO (REGARDLESS OF WHETHER MODELED OR MEASURED), THEN A COMBINED RESPONSE IS APPROPRIATE.]

18. Describe how the state will define household income for verification purposes (e.g., using prior year income).

For households that provide income information, the state will request a sum of the income of all adult occupants over the past 12 months. Information from prior tax year earnings will also be acceptable. As long as the income requirements of identified federal programs fall below 80% AMI and/or 150% AMI, applicants enrolled in a program that qualifies them as categorically eligible do not need to provide this income information.

19. For single-family households, describe what combination of methods will be used for claimants to be able to establish their household income for income qualifications.

States may select the following options:

[CHECK ALL THAT APPLY:]

- ☒ Documentation of household income (for example, 1040)
- ☒ Documentation of enrollment in a pre-qualifying program
- ☒ Self-attestation of income level
- ☒ Self-attestation of enrollment in a pre-qualifying program

The state will recognize any of the following documentation for income to establish that a household is eligible: 1040 from prior year, W2 forms, and wage

statements/payroll. [LIST ANY OTHER RELEVANT FORMS OF DOCUMENTATION THAT THE STATE WILL ACCEPT.]

The state also plans to offer categorical eligibility for the following programs listed in [Tables A-3 and A-4 in the Appendix](#) provided by DOE: [INCLUDE ONLY THOSE PROGRAMS THAT THE STATE PLANS TO RECOGNIZE FROM THE FOLLOWING LIST. IF THE STATE IS INTENDING TO ALLOW WEATHERIZATION ASSISTANCE PROGRAM (WAP) OR SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN (WIC) TO QUALIFY HOUSEHOLDS FOR HIGHER REBATES, PROVIDE ADDITIONAL INFORMATION TO DEMONSTRATE STATE MEETS THRESHOLDS NOTED BELOW.]

- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Medicaid
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Head Start
- ☐ Lifeline Support for Affordable Communications (Lifeline)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ National School Lunch Program - Free (NSLP)
- ☐ Housing Improvement Program (HIP)
- ☐ Housing Opportunities for Persons with AIDS
- ☐ Supplemental Security Income (SSI)
- ☐ Weatherization Assistance Program (WAP)
- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- ☐ Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households
- ☐ Public Housing (housing owned and operated by Public Housing Authorities)

Subject to DOE approval, for single-family households, the state also proposes to recognize the following additional programs with equivalent income requirements.

[LIST ANY ADDITIONAL PROGRAMS THAT THE STATE PROPOSES TO RECOGNIZE ALONG WITH THE SPECIFIC INCOME REQUIREMENTS OF EACH PROGRAM.]

- ☐
- ☐
- ☐

The state will allow applicants to also attest to either meeting the income requirements or enrollment in one of the recognized programs. They will be required to either enter their household income or specify which program(s) they are already enrolled in. Our process for verifying the validity of self-attestations is described in question #27.

20. For multifamily buildings, describe what combination of methods will be used to verify that at least 50% of dwelling units consist of households with incomes less than 80% AMI.

☐ Defer response to State Implementation Blueprint.

To qualify for low-income rebate amounts, multifamily building owners will be required to demonstrate that at least 50% of dwelling units consist of households with incomes less than 80% AMI through either of the following methods:

[OPTION 1:] Provide documentation (as described in our response to question #19) demonstrating that at least 50% of households either have incomes below 80% AMI or are enrolled in any of the following programs: [INCLUDE ONLY THOSE PROGRAMS THAT THE STATE PLANS TO RECOGNIZE FROM THE FOLLOWING LIST. IF THE STATE IS INTENDING TO ALLOW WEATHERIZATION ASSISTANCE PROGRAM (WAP) OR SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN (WIC) TO QUALIFY HOUSEHOLDS FOR HIGHER REBATES, PROVIDE ADDITIONAL INFORMATION TO DEMONSTRATE STATE MEETS THRESHOLDS NOTED BELOW.]

- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Medicaid
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Head Start
- ☐ Lifeline Support for Affordable Communications (Lifeline)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ National School Lunch Program - Free (NSLP)
- ☐ Housing Improvement Program (HIP)
- ☐ Housing Opportunities for Persons with AIDS
- ☐ Supplemental Security Income (SSI)
- ☐ Weatherization Assistance Program (WAP)
- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- ☐ Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households

OR

[OPTION 2:] Provide documentation that demonstrates that one of the following categories applies to 50% of the units in the multifamily building:

- ☐ Public Housing (housing owned and operated by Public Housing Authorities)
- ☐ Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)

- ☐ Privately-owned multifamily buildings that house residents receiving tenant-based assistance
- ☐ Section 42 Low Income Housing Tax Credit (LIHTC)

Subject to DOE approval, for the purposes of multifamily buildings, the state also proposes to recognize the following additional rental subsidy programs with equivalent income requirements. [LIST ANY PROGRAMS THAT THE STATE PROPOSES TO RECOGNIZE ALONG WITH THE SPECIFIC INCOME AND/OR AFFORDABILITY REQUIREMENTS OF EACH PROGRAM.]

21. Please confirm the following:

- Claimant will be required to note the number of individuals who occupy the dwelling unit.
- Claimant will be required to sign an affidavit attesting to the validity of all information provided (e.g., enrollment documents, household income, number of full-time occupants) irrespective of the method of income qualification (e.g., categorical eligibility, self-attestation).
- State's intake system for users to provide income information will display the 80% AMI value for that household's ZIP code and household size to assist the household in comparing its income with those levels prior to signing statements regarding their income.

☒ Yes, the state confirms the above statements.

22. Describe how the 80% AMI levels for each location will be kept up-to-date (use DOE-provided API, other) and linked to DOE systems. Confirm that these levels will correspond to (a) the address of the home at which rebates will be applied and (b) the applicable number of household occupants.

☐ Defer response to State Implementation Blueprint.

The state plans to use the DOE provided API to compare an applicant's household income, occupancy number, and address to the appropriate 80% AMI level to determine income eligibility and level of rebate.

23. Confirm that the state will:

- Review information provided to support income eligibility for all applicants applying for higher income-based rebate levels.
- ☒ Yes, the state confirms the above statement.
- Take steps to verify income eligibility for at least 50% of those applications that use self-attestation to support income eligibility (e.g., confirm enrollment in at least one program that the applicant asserted enrollment in; confirm household income via Income Verification Express Service or other methods as applicable).
- ☒ Yes, the state confirms the above statement.

- After 6 months and not longer than 1 year after program launch, report to DOE the percentage and number of applicants that received rebates but were subsequently found to not meet eligibility requirements.

☒ Yes, the state confirms the above statement.

- Work with the state's DOE project officer to institute additional safeguards or determine if a lesser level of review for applicants using self-attestation is justified depending on the percentage/number of rebates issued without meeting eligibility requirements.

☒ Yes, the state confirms the above statement.

If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

☐ N/A. The state will not reduce this requirement.

[A RESPONSE IS NOT REQUIRED IF CHECKING N/A FOR THE STATEMENT ABOVE.]

The state plans to allow implementers to verify income eligibility in low-income census tracts through random sampling and determine if applicants from these locations have a lower rate of falsified information. The state will provide data to DOE demonstrating the percentage of applicants with falsified income information and other relevant data points. The state will provide data regarding all types of applicants: those that use categorical eligibility, those that provide income data, those that use self-attestation, those applying for consideration at the below 80% AMI level, and those applying for consideration of rebates available to those with household income between 80% and 150% AMI. Based on the rate of erroneous eligibility claims of [ENTER NUMBER: X%] or less, the state will work with DOE to determine whether the state can move to reducing the review process.

The state plans to analyze this data collected to determine how rates of income eligibility compliance compare between applicants in low-income census tracts and other applicants. The state plans to use "fact-based proxy" methods to filter out a larger percentage of applications from households in low-income census tracts, and therefore believe that the process will be more rigorous given that a larger proportion of the reviews will be of applicants located in areas that are NOT characterized as low income.

24. Provide additional information as needed to demonstrate that the proposed approaches for income verification will address all types of households; not create undue burden for claimants; and include safeguards to minimize error and abuse in the process of verifying income.

By offering a variety of methods to demonstrate eligibility, including a wide range of programs recognized as providing categorical eligibility, the state believes that those in the lowest income brackets will have a range of options to demonstrate their eligibility. By offering the option of self-attestation (of either income OR

enrollment in qualifying programs), the state is allowing applicants to move forward with the rebate application process even before the information is verified.

As a safeguard to discourage applicants from falsifying income information, all applicants, when submitting income verification information, will be required to sign an affidavit as well as confirm that they understand the following:

If the information provided is invalid and warrants you ineligible for this rebate, the rebate reservation, if not processed, will be canceled. If the rebate has already been applied to a purchase or service, the homeowner or building owner will be responsible for repaying the state for the rebated amount in addition to a fine not to exceed [ENTER NUMBER: \$X]. The state reserves the right to engage a bill collection agency should repayment not be made within a stated period.

To further minimize error in this process, the state will conduct a review of each applicant's income information prior to issuing a rebate coupon and giving the go-ahead to begin work. This delayed approval is workable given the complexity of whole home retrofits. Furthermore, the state will encourage applicants to provide income information as soon as possible so that review can be concurrent with other steps such as the contractor creating a scope of work. Applicants will be notified of their status (whether they qualify as below 80% AMI) within [ENTER A SINGLE NUMBER OR A NUMBER RANGE] days of submitting their information.

25. Describe how the state will verify (confirm legitimacy) income information for all claimants (e.g., verification within 2 days through IRS, cross-check with enrollment databases of approved programs, calls to employers). If applicable, propose the types of information that the state will provide to DOE to warrant reducing this requirement (e.g., allowing implementers to verify income of a subset of claimants through random sampling).

- ☐ N/A. The state will not reduce this requirement.
- ☐ Defer response to State Implementation Blueprint.

The state will use a third-party income verification vendor to collect income data and verify it through IRS, enrollment databases of approved programs, and/or calls to employers as rebate claims come in.

For those applicants that apply with self-attestation, the vendor will begin by following up on attested information (through Income Verification Express Service (IVES) and inquiries to the program(s) that the applicant stated enrollment in) for 50% of applicants that use self-attestation monthly for the first year. For all other applicants (those that provide documentation of income or enrollment in a qualifying program), the state will have the vendor review that documentation and track any errors. Based on the overall rate of false eligibility claims of [ENTER NUMBER: X%] or less, the state will work with DOE to determine whether the state can move to reducing the review process (that is, reviewing a lower percent of either/both applications with documentation and applications with self-attestation). The state

will raise the rate of review should falsifications reach a level of at least [ENTER NUMBER: X% (E.G., 5%)] over a [ENTER LENGTH OF TIME (E.G., 6 MONTH)] period.

IF APPLICABLE: The state also [CHOOSE ONE: HAS IN PLACE/IS PUTTING IN PLACE] agreements with several agencies [NAME THEM HERE] to allow automated sharing of enrollment lists in qualifying programs. The state will ask the implementer to incorporate this capability via API into the rebate application process. When the state hires a third-party income verification vendor to oversee the income eligibility process, the state will work with them to ease concerns around the collection of personal identifiable information. The state plans to ask them to incorporate an option to use the IVES system to verify income through the IRS. The state will also notify applicants that they can use IVES for free to download their prior year tax returns if they have not kept a copy. Given that this process can be cumbersome, the state will ask the vendor to provide instructions on how to applicants can do so if interested. The state will also ask the vendor to provide a program support phone line/email and follow-up with inquiries to other systems to verify information submitted by applicants that use self-attestation or submit only partial information.

26. Describe how the state will resolve instances when rebates are provided to those who have falsified their incomes.

☐ Defer response to State Implementation Blueprint.

As soon as the information is determined to be incorrect (with review time projected as [ENTER NUMBER: X] days), the implementation contractor's system will automatically do the following:

- (1) Cancel the coupon reservation.
- (2) Inform the homeowner or building owner (and contractor/eligible entity representative where applicable) via one of any contact information provided (emails, home address) that the coupon has been canceled and can no longer be applied.
- (3) Inform the homeowner or building owner that (a) their income eligibility information has been found to be insufficient or invalid, and they are no longer eligible for the requested rebate; or (b) in cases where additional information may establish their eligibility, they can reapply for consideration but will only be issued a new rebate coupon after that information is confirmed or (c) should the homeowner or building owner believe that the state's review is incorrect, they can petition a re-review within 30 days via a provided address, email, or call-in number.
- (4) If applicable, inform the homeowner or building owner (and contractor/eligible entity representative where applicable) that the household is eligible for the lesser rebate percentage cap (50%) and a new coupon can be requested.
- (5) Inform the homeowner or building owner that IF the rebate has already been applied at point of sale (by retailer, vendor, contractor/eligible entity representative), the homeowner or building owner must reimburse the state

(via a provided address or through a provided call-in number via credit card) within 30 days for any rebate amount incorrectly applied with any additional requirement information. If the homeowner or building owner does NOT provide this reimbursement to the state within the allowable period, the state will file the claim to a collection agency and the homeowner or building owner will be subject to additional penalties per that process.

- (6) Inform the contractor/eligible entity representative that if they have already performed the work and applied the rebate to the invoice, it is the homeowner or building owner's responsibility to pay back the state for the applied rebate. The state will reimburse the contractor for the rebate applied at point of purchase provided the contractor/EER provides all information per the program's standard requirements.
- (7) In any instances where a rebate is provided to a homeowner or building owner that is found to not meet income eligibility requirements, the state will bill the homeowner or building owner for the rebated amount. The state may impose an additional fine and will enlist a bill collection agency if repayment is not received within [ENTER NUMBER: X] days.

27. If proposing to allow self-attestation as a means for initial income qualification, provide a detailed description of how and when this approach will be used. Include statements, language, and detailed information regarding follow-up steps that will be used for this process. Additional topics to address include:

- Describe how those applying for rebates will be warned of potential liability associated with falsifying information.
- Explain how signed statements of self-attestation will be securely stored.
- Identify what level of falsified attestations will signal that the system needs to shut down either permanently or be restarted only after sufficient improvements are made.

☐ Defer response to State Implementation Blueprint.

☐ N/A. The state has chosen not to allow self-attestation.

As stated previously, the state will require review of at least 50% of applications that use self-attestation. The state will raise the rate of review should falsifications reach a level of at least [ENTER NUMBER: X% (E.G., 5%)] over a [ENTER LENGTH OF TIME (E.G., 6 MONTH)] period.

All applicants will be asked to confirm that they acknowledge the following:

If the information provided is invalid and warrants the homeowner, building owner, or tenant ineligible for this rebate, the rebate reservation will be canceled if it has not yet been applied to a purchase or service. If the rebate has already been applied to a purchase or service, the homeowner or building owner will be responsible for repaying the state for the rebated amount in addition to a fine not to exceed [ENTER NUMBER: \$X] within [ENTER

NUMBER: X] days. The state reserves the right to engage a bill collection agency should repayment not be made within the required period.

The state will also require all applicants to affirm that the information they are providing is true and correct and that they understand that falsified information is subject to penalty.

The state will require the implementer to retain the (physical or electronic?) signed statements in accordance with data security standards until the applicant's eligibility has been verified.

If the level of falsified attestations reaches [ENTER NUMBER: X% (E.G., 5%)] over a [ENTER LENGTH OF TIME (E.G., 6 MONTH)] period, the state will require proof of all self-attestations prior to providing a rebate voucher. If the falsifications are only higher than [ENTER NUMBER: X% (E.G., 5%)] for one type of self-attestation (either attestation of income or enrollment in qualifying program), the state will only require confirmation of all self-attestations associated with the higher level of falsifications prior to providing a rebate voucher.

28. Describe how the state program will verify applicant information provided to substantiate income eligibility, including systems that will be used to verify, where applicable, that at least one member of a household has been enrolled in a program included within the [Federal Programs Approved for Categorical Eligibility](#) document or other state-proposed approved by DOE within the prior 12 months.

☐ Defer response to State Implementation Blueprint.

The third-party vendor the state selects to oversee the income eligibility process will be required to review all of an applicant's documentation whether to substantiate income or verify enrollment in a qualifying program. They will be required to visually review all submitted information. If the documentation is insufficient or unclear, they will be required to consider the application as a case of self-attestation and then follow the review process associated with those applications. In addition to visual review of documentation, the state plans to integrate automation into the process where possible (e.g., use of screening technology to review standard information like 1040 forms, enrollment cards for specific programs) to confirm whether the information provided in the documentation meets requirements. Where needed, the implementer will call agencies that administer programs approved for categorical eligibility to confirm a household member's enrollment.

29. If applicable, identify the federal or other programs by which the state plans to allow categorical eligibility.

☐ N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.

The state plans to offer categorical eligibility for the following programs listed in [Tables A-3 and A-4 in the Appendix](#) provided by DOE: [INCLUDE ONLY THOSE PROGRAMS THAT THE STATE PLANS TO RECOGNIZE FROM THE FOLLOWING LIST. IF THE STATE IS

INTENDING TO ALLOW WEATHERIZATION ASSISTANCE PROGRAM (WAP) OR SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN (WIC) TO QUALIFY HOUSEHOLDS FOR HIGHER REBATES, PROVIDE ADDITIONAL INFORMATION TO DEMONSTRATE STATE MEETS THRESHOLDS NOTED BELOW.]

- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Medicaid
- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Head Start
- ☐ Lifeline Support for Affordable Communications (Lifeline)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ National School Lunch Program - Free (NSLP)
- ☐ Housing Improvement Program (HIP)
- ☐ Housing Opportunities for Persons with AIDS
- ☐ Supplemental Security Income (SSI)
- ☐ Weatherization Assistance Program (WAP)
- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- ☐ Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households

For multifamily buildings:

- ☐ Public Housing (housing owned and operated by Public Housing Authorities)
- ☐ Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)
- ☐ Privately-owned multifamily buildings that house residents receiving tenant-based assistance
- ☐ Section 42 Low Income Housing Tax Credit (LIHTC)

30. If applicable, propose any additional federal or other programs to be considered for categorical eligibility. For any programs not already approved, describe how the program's eligibility aligns with the Home Efficiency Rebates income requirements.

- ☐ N/A. The state will not propose additional federal or other programs to be considered for categorical eligibility.
- ☐ Defer response to State Implementation Blueprint.

Subject to DOE approval, the state also proposes to recognize the following additional programs with equivalent income requirements. [LIST ANY PROGRAMS THAT

THE STATE PROPOSES TO RECOGNIZE ALONG WITH THE SPECIFIC INCOME REQUIREMENTS OF EACH PROGRAM.]

31. Identify whether the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period (e.g., proof of enrollment within the past 12 months).

☒ Yes, the state requests authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

☐ N/A. The state does not request authorization to allow use of categorical eligibility determinations based on program participation outside of a one-year period.

If yes, explain the state's proposal and describe the rationale.

☐ Defer response to State Implementation Blueprint.

[RESPOND ONLY IF THE STATE PROPOSES A DIFFERENT TIME PERIOD]

The state proposes that applicants provide proof of enrollment in a qualifying program within [ENTER LENGTH OF TIME (E.G., 2 YEARS)] of the date of their rebate application. Many low-income programs do not update their enrollment information annually; and some households (given relocations or other factors) may not have up-to-date enrollment documentation. Therefore, the state proposes to accept documentation that demonstrates a household's enrollment within this longer period of time.

32. Identify whether the state requests authorization to allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document [Federal Programs Approved for Categorical Eligibility](#). For each deviation requested, propose, and provide documentation to justify the requested change. Documentation must demonstrate that the state imposes income requirements equivalent to or less than 80% AMI.

☐ Defer response to State Implementation Blueprint.

☐ N/A. The state will not allow categorical eligibility for a program in a way that is not consistent with the "level of categorical eligibility" listed in the document [Federal Programs Approved for Categorical Eligibility](#).

[RESPOND ONLY IF THE STATE PROPOSES DIFFERENT LEVELS OF ELIGIBILITY FOR CERTAIN RECOGNIZED PROGRAMS:]

The state proposes the following changes in terms of establishing an applicant's eligibility as meeting the below 80% AMI requirement. While the following programs serve higher income households (i.e., up to 150% AMI) based on federal requirements, our state imposes additional income restrictions consistent with the below 80% AMI requirement. [LIST EITHER OR BOTH OF THE FOLLOWING PROGRAMS AND PROVIDE SUBSTANTIATING INFORMATION REGARDING THE STATE'S INCOME REQUIREMENTS.]

- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- ☐ Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households

33. Provide a brief description of the procedures and penalties the state will provide to ensure that renters are not subject to unjustified rent increases.

For all tenant-occupied properties that receive higher rebate amounts available only to households with incomes less than 80% AMI, the state will require the building owner to sign a statement acknowledging the following:

- The owner agrees to rent the dwelling unit to a low-income tenant.
- The owner agrees not to evict a tenant to obtain higher rent tenants based upon the improvements.
- The owner agrees not to increase the rent of any tenant of the building as a result of the energy improvements with exception of increases to recover actual increases in property taxes and/or specified operating expenses and maintenance costs.
- The owner agrees that if the property is sold within [ENTER A NUMBER NO LESS THAN TWO] years of receipt of the rebates, the aforementioned conditions apply to the new owner and must be part of the purchase agreement.
- In the event the owner does not comply, the owner must refund the rebate.
- The owner will provide written notice to tenants explaining their rights and the building owner's obligations (e.g., add an addendum to the lease).
- The owner will be subject to penalties commensurate to their actions with a minimum penalty of [ENTER NUMBER: \$X].

The state will provide contact information for tenants to notify the state of breaches to this agreement. The state will also include this information in the consumer education campaign, so tenants are aware of their rights under the applicable state law.

34. Explain how the state will identify eligible contractors or aggregators and what tools will be used to pay the \$200 disadvantaged community incentive.

☐ Defer response to State Implementation Blueprint.

The state will be using the [DOE Rebate Tracking System](#) and will [ENTER ONE OF THE FOLLOWING]:

[OPTION 1:] use the Climate and Economic Justice Screening Tool (CEJST) maps to identify disadvantaged communities.

OR

[OPTION 2:] provide a map of disadvantaged communities so that the DOE Rebate Tracking System can associate a home's location with its disadvantaged community status.

When a rebate coupon is issued via the DOE system, that unique coupon will state whether the contractor is eligible for the \$200 incentive based on the location of the home. At that same time that the state issues the rebate coupon to be applied to the energy upgrade project, the state will reserve an additional \$200 to be paid to the contractor when they submit the required information about the completed project. The state will also provide educational materials and do outreach to contractors so that they are aware of this potential incentive.

Section 3.1.4: Community Benefits Plan

35. Describe how the state program will define a disadvantaged community.

If not using the default disadvantaged community definition (low-income households located in a disadvantaged community identified by the Climate and Economic Justice Screening Tool (CEJST), a state must explain how the proposed definition will meet the following three criteria as described in DOE J40 implementation guidance⁴:

- The communities of concern identified by the state tool or definition must conform to the definition of communities established in U.S. Office of Management and Budget (OMB) guidance:
 - a group of individuals living in geographic proximity to one another that experiences common conditions.
 - a geographically dispersed set of individuals (such as migrant workers or Native Americans) that experiences common conditions.
- The state tool or definition must consider two or more of the following indicators when identifying communities that should be classified as disadvantaged for the purposes of directing federal investments under Justice40:
 - Low income, high and/or persistent poverty
 - High unemployment and underemployment
 - Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
 - Linguistic isolation
 - High housing cost burden and substandard housing
 - Distressed neighborhoods
 - High transportation cost burden and/or low transportation access
 - Disproportionate environmental stressor burden and high cumulative impacts

⁴ See pages 8-9 of <https://www.energy.gov/sites/default/files/2022-07/Final%20DOE%20Justice40%20General%20Guidance%20072522.pdf> for more details.

- Limited water and sanitation access and affordability
- Disproportionate impacts from climate change
- High energy cost burden and low energy access
- Jobs lost through the energy transition
- Access to healthcare
- The communities of concern identified by the state tool or definition must be currently mapped in software or must be easily overlaid in GIS so that communities can be easily identified by stakeholders.

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state will use the DOE-provided definition of disadvantaged communities and use the federally-issued CEJST to identify disadvantaged communities (available here: [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#))

OR

[OPTION 2:] The state will issue a state-specific map of disadvantaged communities that will meet the requirements described in the [Program Requirements & Application Instructions](#) document. Specifically, the state will:

- (1) Apply the definition of a disadvantaged community as being a group of individuals living in geographic proximity to one another that experiences common conditions; and/or a geographically dispersed set of individuals (such as migrant workers or Native Americans) that experiences common conditions.
- (2) Consider the following indicators when identifying disadvantaged communities: [CHOOSE AT LEAST TWO OF THE FOLLOWING]
 - ☐ Low income, high and/or persistent poverty
 - ☐ High unemployment and underemployment
 - ☐ Racial and ethnic residential segregation, particularly where the segregation stems from discrimination by government entities
 - ☐ Linguistic isolation
 - ☐ High housing cost burden and substandard housing
 - ☐ Distressed neighborhoods
 - ☐ High transportation cost burden and/or low transportation access
 - ☐ Disproportionate environmental stressor burden and high cumulative impacts
 - ☐ Limited water and sanitation access and affordability
 - ☐ Disproportionate impacts from climate change

- ☐ High energy cost burden and low energy access
- ☐ Jobs lost through the energy transition
- ☐ Access to healthcare

(3) Provide a map of the state-issued disadvantaged communities to DOE/PNNL in the required format to ensure that this information is used when designating which homes are eligible for contractor incentives.

Section 3.1.5: Processing and Delivering Rebate Funds to Eligible Rebate Recipients

36. Describe what types of systems will be put into place to allow effective processing of rebates.

- ☐ Defer response to State Implementation Blueprint.

Our implementation contractor or a separate rebate processing firm will be charged with establishing an electronic rebate processing system. The state's rebate processing system will have protocols in place to ensure that measured path rebates are completed within 60 days, as required, of the submittal of all required documentation (e.g., invoice, measured data, analysis). For modeled programs, the rebate will be issued with 4 weeks (28 days), as required, of receipt of an eligible rebate application to the rebate processor.

In our request for proposals (RFP) for selecting a program implementer(s), the state will ask for qualifications regarding rebate processing but not make this a functional requirement. The state will issue a separate RFP for rebate processing in the event that our selected implementation contractor does not meet our needs for carrying out this function. Our implementer, or rebate processor, if different, will be required to submit a rebate processing process flow that demonstrates how they will ensure the rebate requirements are completed within the required timelines for both measured and modeled Home Efficiency Projects.

Our implementer (and rebate processor if different) will be required to use the [DOE Rebate Tracking System](#) to ensure effective issuance of rebates, eliminate or dramatically reduce the possibility of duplicating rebates, and allow effective flow of information to the users as well as to our state, our implementer and DOE. The state will expedite rebate initiation and processing through the use of electronic systems and standard data specifications including but not limited to HPXML.

In addition to the rebate processing functionality, the program will include a user-centered interface that can easily be used by all types of entities participating in the rebate programs (e.g., household, landlord, contractor) to carry out the different steps of the rebate process (e.g., rebate application, data input, reimbursement request).

As a complement to the IT system, the state will provide a hotline to assist all customers, particularly those with limited access to internet-based systems. The state will have outreach (web-based as well as other forms) to ensure that building owners, contractors, vendors, distributors, manufacturers, and others have up to

date information. Along with the issuance of a rebate coupon (regardless of who initiates the process), the state will provide information to all affected parties (i.e., contractor, homeowner at a minimum, and others where relevant) that communicates limitations of the rebates, how they can be correctly applied, and how rebate processing works to reimburse contractors/aggregators for rebates applied at time of sale.

37. Describe how the state will ensure processing of rebates⁵ within required timeframes (e.g., through a processing company, through program implementers, or other entities or methods). Include information on corrective actions that the state will implement in the event of lengthier processing times.

☐ Defer response to State Implementation Blueprint.

The state will use a(n) [ENTER ONE OF THE FOLLOWING OR OTHER TYPE OF ENTITY: IMPLEMENTATION CONTRACTOR, REBATE PROCESSING COMPANY, OTHER] to carry out rebate processing.

The state will require rebate processing to occur within 4 weeks of receipt of required and acceptable information for projects that use the modeled savings approach and within 60 days of receipt of an eligible rebate request for projects that use the measured savings approach.

Our [ENTER TYPE OF ENTITY OR SPECIFIC ENTITY THAT WILL PROCESS PAYMENTS (E.G., IMPLEMENTER, REBATE PROCESSOR, OTHER)] will be required to submit a rebate processing process flow that demonstrates how they will ensure the rebate requirements are completed within the required timelines for both measured and modeled projects. The implementer will be required to demonstrate staff training on the protocols and offer a helpline for technical support.

Our program guidelines and onboarding process will include information on the process and requirements associated with submitting and accessing rebates on behalf of consumers. The state will establish clear benchmarks and performance metrics and monitor performance.

The state will require our rebate processor to report processing times [ENTER TIMEFRAME (E.G., ON A MONTHLY BASIS).] Should the processing times exceed those stipulated above, the state will require the processor to provide an explanation as well as propose and implement new methods or systems to speed up processing within 30 days of notification. Our contract with the rebate processor will include the option for the state to impose financial penalties on the processor if processing times are not remedied in an acceptable period. Should the state find that processing (for specific reasons) cannot be completed within 60 days, the state will contact our DOE project officer to determine an appropriate process moving forward.

⁵ States should refer to the accompanying [Data & Tools Requirements Guide](#) and [PNNL.gov/projects/rebate-tools](https://www.pnnl.gov/projects/rebate-tools) for additional details on requirements and recommended workflows for processing rebates.

38. Describe how the proposed processing system will be integrated with a system for processing rebates under Section 50122. Note if the state plans to use separate systems.

☐ Defer response to State Implementation Blueprint.

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state will apply the DOE/PNNL provided workflows and use the DOE Rebate Tracking System to provide a seamless and integrated approach to both types of rebates.

OR

[OPTION 2:] The state will use a separate processing system because [FILL IN APPROPRIATELY (E.G., THE STATE HAS AN EXISTING SYSTEM APPLICABLE ONLY TO HOME EFFICIENCY OR HOME ELECTRIFICATION & APPLIANCE REBATES.)] [DESCRIBE THIS SYSTEM IN 3-5 SENTENCES INCLUDING HOW THE SYSTEM WILL FLAG FOR DUPLICATE ADDRESSES, HOW IT WILL ENSURE THE SAME MEASURE IS NOT BEING FUNDED FROM SEPARATE PROGRAMS, AND WHAT WILL HAPPEN IF THE SYSTEM FLAGS A DOUBLE REBATE.]

39. If the state does NOT intend to use a federally provided web-based tool to determine whether a home is in a disadvantaged community, confirm that the state will provide the ZIP codes with all disadvantaged communities as defined by the state to the DOE system.

☐ Yes, the state confirms the above statement.

☒ N/A. The state will use a DOE-provided web-based tool to determine whether a home is in a disadvantaged community.

40. Confirm that the state system will link to DOE-provided systems via Application Programming Interface (API).

☒ Yes, the state confirms the above statement.

Section 3.1.6: Data Collection and Evaluation

41. Confirm that the state will submit a Privacy and Security Risk Assessment in the State Implementation Blueprint.

☒ Yes, the state confirms the above statement and will include it with this narrative document.

☐ Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

42. Explain how data will be protected, specifically addressing security measures and privacy measures.

☐ Defer response to State Implementation Blueprint.

[IN THIS RESPONSE, CONSIDER THE FOLLOWING:

- WHICH DATA SECURITY MEASURES WILL BE APPLIED AND ENFORCED
- HOW DATA WILL BE SECURELY COLLECTED AND TRANSFERRED (INCLUDE SYSTEM OR SOFTWARE NAME IF KNOWN)
- HOW DATA WILL BE SECURELY STORED
- HOW PII AND CONSUMER PRIVACY WILL BE PROTECTED
- ADDITIONAL STATE RULES OR REGULATIONS THAT WILL BE FOLLOWED]

The state will apply all data security measures and privacy measures as required by [ENTER NAME OF RELEVANT STATE POLICY, LAW, PRACTICE, OR REGULATION]. Per program requirements, the state will not sell any collected data and will retain data/records for at least 3 years after the state submits our final expenditure report to US DOE. All of these requirements will extend to our program implementers and/or evaluators.

43. Provide documentation of the processes to monitor, identify, and address security and privacy threats.

☐ Defer response to State Implementation Blueprint.

[IN THIS RESPONSE, CONSIDER THE FOLLOWING:

- PROCESSES AND PROCEDURES FOR MONITORING DATA SECURITY AND IDENTIFYING BREACHES. INCLUDE DETAILS OF TIMING AND BREADTH OF MONITORING.
- HOW CONTRACTORS AND OTHER ENTITIES THAT HANDLE PERSONAL IDENTIFIABLE INFORMATION AND OTHER DATA WILL BE TRAINED IN DATA PRIVACY AND SECURITY
- HOW THE STATE WILL ADDRESS PRIVACY OR DATA BREACHES
- INCLUDE ANY ADDITIONAL STANDARD OPERATING PROCEDURES OR STATE REQUIRED PROCEDURES THAT WILL BE FOLLOWED.]

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1: PROVIDE STANDARD OPERATING PROCEDURES LANGUAGE HERE IF THE STATE HAS THEM.]

OR

[OPTION 2:] The state will conduct an independent review of the program's processes to monitor, identify, and address security and privacy threats before launching the program and every 2 years thereafter or more frequently if warranted.

44. Confirm that the state will require billing data release and describe how the state will gain access to billing data for program requirements and program evaluation.

☒ Yes, the state confirms the above statement.

☐ Defer response to State Implementation Blueprint.

The state will partner and work with their utilities [ENTER NAME OF UTILITIES] to ensure DOE will have access to billing/usage data when requested. The utilities will sign an agreement confirming their participation and this will be submitted to DOE.

For all projects that apply for a Home Efficiency rebate, the state will require the homeowner to provide access to 12 months of prior billing data. This can be done either by submitting that data to the contractor (who will then provide to the state) or by providing the utility account number. In either case, the homeowner must sign a statement that they provide access to 12 months of all energy utility billing data prior to the upgrade as well as 12 months of all energy utility billing data after the upgrade for evaluation purposes. The homeowner must provide written consent of releasing their billing data through a standard form provided with the rebate coupon in order to receive a rebate. The contractor (or aggregator) will be required to provide the signed form as part of their documentation of the project prior to receiving reimbursement for the applied rebate.

45. Confirm that the state will collect the required data and cooperate in program evaluation processes as listed in Section 3.1.6.3 of the [Program Requirements & Application Instructions](#) document.

☒ Yes, the state confirms the above statement.

46. Confirm if the state is planning to conduct its own evaluation, and if so, what type(s) of evaluations.

☒ Yes, the state is planning to conduct its own evaluation. (Describe types of evaluations).

[ONLY RESPOND IF THE STATE PLANS TO CONDUCT ITS OWN EVALUATION.]

The state plans to conduct a [INCLUDE ONE OR MORE OF THE OPTIONS BELOW AND/OR OTHER TYPES OF PLANNED EVALUATIONS]:

- ☐ Process evaluation to evaluate the program experience for program participants, consumers, contractors, distributors, vendors.
- ☐ Process evaluations to understand success and recommendations for improvements towards program priority areas (e.g., disadvantaged communities, multifamily, regionally focused programs)
- ☐ Impact evaluation to measure program impacts (e.g., consumer bills, fuel types, energy savings)
- ☐ Market effects evaluation to measure the influence the Home Rebates program is making within the state
- ☐ Randomized controlled studies of rebate impacts on savings, homeowner satisfaction and/or other metrics

[LIST ANY ADDITIONAL EVALUATIONS THE STATE IS PLANNING TO CONDUCT.]

If yes, confirm that the state will:

- Cooperate with DOE to meet all the requirements listed in Section 3.1.6.3 of the [Program Requirements & Application Instructions](#) document.
- ☒ Yes, the state confirms the above statement.
- Submit an evaluation plan for DOE review within three months of program launch.
- ☒ Yes, the state confirms the above statement.
- Provide results to DOE.
- ☒ Yes, the state confirms the above statement.
- ☐ N/A. The state does not plan to conduct its own evaluation.

47. If the state plans to conduct evaluations on its programs, describe the evaluation objectives, high level work plan, and timing of the evaluations and whether the state would request to be excluded from DOE-led evaluations.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state does not plan to conduct its own evaluation.

[ONLY RESPOND IF THE STATE PLANS TO CONDUCT ITS OWN EVALUATION.]

- The state will establish our evaluation objectives as part of developing our evaluation plan. Potential objectives include but are not limited to (a) understanding program experience of different stakeholders to improve process (b) quantifying impacts on bill savings, GHG, and/or non-energy benefits and developing recommendations for increasing beneficial outcomes; (c) measuring lasting changes in behavior and decision-making of consumers and suppliers.
- As a first step, the state will identify what types of impacts/outcomes the state wants to measure.
- Evaluations will be designed to help us assess progress toward meeting our program's goals and to help us make process and other improvements over the course of the rebate program.
- Evaluations will be designed to complement national reviews as well as other components of our program design and implementation (e.g., quality assurance).
- The state will identify what data needs to be collected as part of our implementation processes (e.g., data on improvements, costs) and what data will be collected as part of evaluations (e.g., focus group responses). The state will ensure that relevant data collection is integrated into our implementation processes.

The state will develop a work plan that describes anticipated research strategies, evaluation methods, as well as the size and timing of our evaluations.

Consumer Experience

Section 3.2.1: Outreach and Education Strategy

48. Confirm that the state will develop and submit an outreach and education strategy consistent with Section 3.2.1.

☒ Yes, the state confirms the above statement and will include it with this narrative document.

☐ Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

Section 3.2.2: Home Assessments

49. Describe the processes and procedures for conducting home assessments that meet program requirements.

☐ Defer response to State Implementation Blueprint.

Overall Requirements

As part of our program guidelines and written into our contractor participation agreements, the state will require every home to receive an assessment that meets DOE requirements – one for modeled energy savings projects and another for measured energy savings projects. These assessments, when done on single-family homes, must also be in accordance with BPI 1100/1200 home assessment standards. Additional information will be posted prior to launch of this program, including requirements for what information must be provided to the state and/or homeowner or building owner (e.g., a scope of work, cost and expected energy and cost savings).

To ensure effective assessments meeting the state's requirements, the state and/or its implementer(s) will provide onboarding, training, and tools to participating contractors. Participating contractors will receive home assessment checklists that list the minimum data collection requirements.

Specific home assessment requirements for each building type and each project approach are described below.

Modeled and Measured Approach: Single- family

The home assessment protocol for single family modeled and measured energy-savings projects will adhere to requirements of BPI 1100/1200 home assessment standards. All assessments will feed data into modeling software approved by DOE. Given that BPI 1100/1200 already encompasses most of the data required to generate a Home Energy Score (e.g., data on all major energy systems, envelope conditions (attic and wall insulation; windows; placement of ducts; level of air sealing & duct sealing), assessment tools will be required to concurrently generate a Home Energy Score model and recommendations, as well as a Home Energy Score for integration into the project certificate. As required by the program requirements, all data will adhere to the HPXML v3 specification and therefore allow

seamless transfer to the Home Energy Scoring Tool. All contractors will be required to take the online Home Energy Score training and pass the online test and required to use DOE-approved modeling tool(s) to ensure that data collection is consistent with Home Energy Score requirements (e.g., derating of insulation based on installation, definition of square footage). In addition to providing the Home Energy Score for integration into the certificate, this capability will allow the state to compare the outputs/calculations made using the standardized Home Energy Scoring Tool model with the contractor's energy savings estimates.

Modeled Approach: Multifamily

Contractors will be required to complete a ASHRAE Standard Level 2 audit and run an energy model through software approved by DOE. The ASHRAE L2 audit data need to be reported in BuildingSync schema format. Energy modeling will be used to analyze the proposed retrofits and estimate the cumulative energy savings of the recommended measures.

Measured Savings: Multifamily

As with single family measured savings projects, the assessment requirements will not be as extensive as those for modeled savings projects. Contractors will be required to complete an ASHRAE Standard Level 1 audit. Data will need to be reported using BuildingSync data specifications.

50. Describe how home assessment data and results will be verified for accuracy.

☐ Defer response to State Implementation Blueprint.

Assessment accuracy starts with training which will be required of all participating contractors, as referenced in the previous question.

Our program's Quality Assurance (QA) and Quality Control (QC) protocols will include the following elements to assess accuracy:

- Approved assessment and data collection tools will be required to include data validation checks and constraints to minimize data entry mistakes. These basic checks will be on both the input and the output side.
- Every project will include a desk review by our implementer.
- The state will conduct third party on-site QC on the first assessment completed by each newly onboarded contractor.
- On an annual basis, the state will randomly sample the lesser of (a) a statistically significant sample or (b) [ENTER NUMBER: X% (E.G., 5%)] of all completed jobs for on-site follow-up and verification of installed equipment and the assessment data, as feasible.
- Through automated data analytics (if resources allow) or more manual review, the state will compare data submitted across contractors and aggregators to detect outliers and potential problems with assessments. At a minimum, this will be conducted no later than one year after program launch.

- Should some contractors/aggregators appear to consistently report extremely poor baselines inconsistent with the targeted housing stock, the state or its implementer will follow-up with calls to the households served by these contractors to better understand the households' perspectives of the work performed and outcomes.
- Contractors who are flagged due to data collection anomalies or concerns (where found in no more than 25% of their projects) will be required to take additional training on conducting assessments and/or shadow other contractors to learn best practices.

51. Describe what processes will be put in place for home assessments for multifamily buildings, including for energy used by common areas.

☐ Defer response to State Implementation Blueprint.

All information provided in response to question #49 applies to this question - with the exception of information only pertaining to single-family.

Additional information is provided here:

The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions. Pre- and post-diagnostics will be required as needed depending on the improvement measures that will be implemented.

Section 3.2.3: Access to Residential Utility Data

52. Confirm that the state will develop and submit a Utility Data Access Plan consistent with the program requirements in Section 3.2.3 in the [Program Requirements & Application Instructions](#) document.

☒ Yes, the state confirms the above statement and will include the plan with this narrative document.

☐ Yes, the state confirms the above statement but defers a response to State Implementation Blueprint.

Section 3.2.4: Project-Specific Energy Savings Calculations

53. Confirm if the state will implement the modeled path, measured path, or both.

☐ The state will implement the Modeled program path.

☐ The state will implement the Measured program path.

☐ The state will implement both the Modeled and Measured program paths.

Section 3.2.4.1: Calculating Modeled Energy Savings

54. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the modeled program path.

The state will apply standard conversion factors to calculate kWh equivalents as noted in the following chart:

Fuel	Measured Energy Rate	Convert to kWh
Natural Gas	therm	kWh = therm * 29.3
Propane	gallon	kWh = gallons * 26.8
Fuel Oil	gallon	kWh = gallons * 43.9

[IF THE STATE IS PROPOSING TO USE SOURCE (RATHER THAN SITE) ENERGY SAVINGS AS ONE OF ITS METRICS, INCLUDE A STATEMENT SUCH AS THE FOLLOWING]:

For any instances where the state will calculate source energy savings, site electricity will be converted to source energy by applying the relevant location-specific factor provided by eGRID (EPA: <https://www.epa.gov/egrid>).

55. Describe the energy savings objectives and overall approach for estimating energy savings for the modeled program path (if applicable).

- ☐ N/A. The state is not implementing the modeled program path.

Objectives:

- Maximizing energy savings through targeting home characteristics and high energy bills;
- Focusing on envelope; and,
- Replacing natural gas through conversion to heat pumps.

First, the state wants building owners to get good advice regarding the types of improvements that make sense for their homes, including how different measures will affect utility bills, comfort, indoor air quality, moisture. To that end, the state will require contractors to model energy savings attributable to envelope improvements for homes with existing conditions that are less efficient than state-established envelope efficiency minimums (e.g., insulation R values). Second, the state wants the modeled energy estimates to be in line with the actual energy savings realized after the improvements are made. Given that the energy model predicts energy savings (which can then be translated into cost savings predictions based on local fuel rates), the state will require contractors to include their underlying assumptions regarding occupancy and occupant behavior (e.g., set points). The state may also

require them to run their models using standardized assumptions that the state will provide.

The state will require contractors to provide an estimated range of energy savings and utility bill impacts in the information that they provide to residents or building owners prior to beginning the work so that they have a better idea of potential impacts.

As noted in responses to questions #49 and #58, the state will also compare contractors' energy models with results the state will obtain from running the modeling inputs through the standardized Home Energy Scoring Tool (which already applies conservative assumptions regarding occupancy, occupant behavior, air leakage, etc.).

56. Identify which upgrades may be included in the modeled savings estimate, including at least one major upgrade as defined in Section 2.1 of the [Program Requirements & Application Instructions](#) document, including a brief description of if the state will or will not require the installation of envelope prior to other upgrades (if applicable).

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the modeled program path.

Our state will allow only inclusion of upgrades consistent with BPI-2400 for the purposes of modeling energy savings. The state will not allow upgrades to portable lighting (e.g., changing out light bulbs) or plug load improvements to count toward the energy savings calculation.

The state will require all contractors to propose envelope improvements (air sealing, duct sealing, window attachments, insulation) to residents or building owners when a home's baseline envelope conditions are insufficient. Prior to launching the program, the state will work with experts (e.g., DOE, national labs) to establish these pre-condition thresholds (e.g., attic insulation must have at least a certain R value). The state recognizes that some residents or building owners may not wish to expend resources on certain improvements; however, the state will require contractors to run at least one comparative model that includes envelope improvements in order to demonstrate how different options are likely to affect energy use and utility bills. The state will also require contractors to provide standard information regarding how a home's conditions interrelate and how envelope can affect comfort, moisture, etc.

57. Identify which modeling tools the state proposes to authorize for its program. Identify whether any proposed tools have not yet received DOE approval.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the modeled program path.

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state plans to use the following DOE-approved modeling tool(s)
[FILL IN SOFTWARE NAMES]:

OR

[OPTION 2:] The state proposes to use the [FILL IN SOFTWARE NAME] modeling software and will coordinate with DOE for review and approval of this tool.

OR

[OPTION 3:] The state has not yet confirmed what modeling tool(s) will be allowed. The state will provide a list no later than 3 months prior to program launch, consistent with the deadline for State Implementation Blueprint in order to obtain DOE review and approval.

58. Describe how the state will monitor the energy savings reliability of models and tools for the modeled program path.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the modeled program path.

As noted in response to question #49, the State will require contractors to use DOE-approved modeling tools.

When modeling single-family homes, contractors will need to simultaneously run Home Energy Scoring Tool models as a point of comparison. Given that the Home Energy Scoring Tool applies standard operating assumptions and uses EnergyPlus as its underlying energy engine), this point of comparison will help identify if some models or contractors are consistently over or under-predicting energy savings.

More specifically, for each modeled home, this will entail the following steps:

- (1) Run the assessment data through Home Energy Scoring Tool via API;
- (2) Compare the recommended improvements from the Home Energy Scoring Tool with the improvements proposed or made by the contractor for the rebate project;
- (3) Complete a second Home Energy Scoring Tool modeling run with data that reflects the contractor's proposed or implemented improvements;
- (4) Compare the estimated energy savings provided by the Home Energy Scoring Tool (which is generated by comparing the Home Energy Score model from pre-improvements with the Home Energy Score model from post-improvements) with the energy savings estimate provided by the contractor; and
- (5) If overpredictions exceed stated threshold take corrective action (explained below under State Review).

The State will require modeling software to run these additional models via API so that additional assessor time is not required to generate these comparative models.

Contractors will be encouraged to compare their savings estimates and proposed retrofit measures to those of the Home Energy Scoring Tool runs but will not be required to use the recommendations from the Home Energy Scoring Tool.

State Review

Individual Project Applications: The state or its implementer will spot check these comparative runs as they are submitted and follow-up on any that are more than [ENTER NUMBER: X%] different in terms of savings to either ask the contractor to modify their estimate and/or scope of work; or better understand the contractor's rationale for their estimate and proposed scope of work.

Portfolios of Projects: The state will contact those contractors and/or aggregators with overpredictions exceeding [ENTER NUMBER: X%] on average across their portfolios of projects (as compared to the Home Energy Score high estimate) and not allow them to continue participating in the program if overpredictions exceed [ENTER NUMBER: X%] on average. This analysis will be done after completion of [ENTER NUMBER: X] homes by an individual contractor or [ENTER NUMBER: X] homes by an aggregator; and will be repeated with every additional [ENTER NUMBER: X] projects or until [ENTER NUMBER: X] projects are completed and found to be on average within the aforementioned limits.

Modeled vs. Actual Usage Analyses: Upon completion of the first year of the program, and at least annually thereafter, the state or its implementor will randomly select homes (single-family and multifamily) that have received improvements and assess how their actual (measured) savings compare with the predicted savings (whether through modeled or measured). The state is instituting agreements with our state's utilities to ensure that the state can collect this data in a seamless manner for the purposes of evaluation. As part of our evaluation plan, the state will propose the scope of this analysis, but as a first cut, the state expects to randomly select a representative sample of projects. The state may select a larger percentage initially and then reduce the percentage over time depending on the results of this analysis.

To the greatest extent possible, the aforementioned comparative processes and analyses will be programmed to occur automatically either through the DOE/PNNL system or a separate system used by the state or our implementer.

If resources allow, the state will do one or more of the following:

- The state may solicit ideas from evaluators (either through RFIs or as part of an RFP process) on how to most efficiently compare pre- and post-energy usage to gain early and rolling feedback on model reliability.
- The state will conduct standard analytics on pre and post data to look for trends in reliability by type of software, contractors, housing type, fuel type, etc. The state will establish a feedback loop to our implementer to use findings to inform corrections, modifications, and improvements as appropriate.
- The state will work with our implementers to run modeled-path savings estimates (that is, conduct full assessments and calibrate the homes to their

historical energy usage consistent with BPI 2400) for a set of homes going through the measured path. The state will, by definition, already be collecting post-retrofit energy consumption in these homes and can evaluate how reliable the modeled savings were in these measured path homes.

59. If the state plans to allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400, request alternative modeled path(s) by:

- Detailing for which exceptions the state plans to apply the alternative approach (e.g., multifamily, lack of delivered fuel bills, etc.).
- Providing a detailed description of the method(s) that the state will use to estimate energy savings for each exception and how the state will ensure consistency between the alternative method and the results of BPI-2400 such as a realization rate adjustment to be used in reported savings estimates.
- Commit to carrying out evaluations upon thresholds listed in Section 3.2.3.1 of the [Program Requirements & Application Instructions](#) document.
- Describe how the state will use any evaluation results or new information to update and adjust its alternate savings modeling method.

☐ Defer response to State Implementation Blueprint.

☐ N/A. The state will not allow modeling for homes for which BPI-2400 is not applicable or that are not eligible for BPI-2400.

Consistent with the DOE program requirements and BPI-2400, the state will require contractors to calibrate their models to historical energy consumption data. There are a few instances in which our program will not require calibration, including the following types of circumstances:

- Multifamily buildings;
- Homes with delivered fuels and the renter/homeowner attests they cannot locate recent bills; and
- Where occupants have lived in the home less than one year.

For single family homes where calibration is not required, the state will require the contractor to use the Home Energy Scoring Tool.

Scopes of work generated in cases with non-calibrated models will receive more thorough desk review to ensure reasonable estimated savings based upon comparison to the estimated savings generated by the Home Energy Score.

Given that BPI-2400 does not cover multifamily buildings, the state will not require calibration but instead encourage contractors to do so as part of ASHRAE Standard Level 2 audits performed when using the modeled approach and a DOE-approved modeling software. As part of quality assurance described in other application responses, the state will compare results from measured savings projects with those from modeled savings projects based on pre- and post-usage data where available for modeled savings projects.

For single-family and multifamily projects that use an alternative modeling approach, the state commits to conducting evaluations based upon the thresholds listed in Section 3.2.4.1 for these exceptions. The state will conduct its first evaluation of a representative sample of sites upon (whichever comes first):

- At least 200 projects have been completed; OR
- 10% annually, or 20% cumulative, of the program-to-date modeled funds have been provided for projects using an exception.

Depending on the results, the state may require additional program evaluations not more than once every two (2) years thereafter.

Following the first evaluation, our implementers will adjust program guidelines based upon the evaluator's findings to ensure the any non-calibrated energy savings estimates are at least as reliable as those including calibration.

If our state, based on discussion our implementer and evaluator, concludes that it cannot expect reliable results without energy bill calibrated models, then the state will work with subject matter experts (e.g., national laboratories) to provide another approach to address these circumstances.

60. For multifamily, describe the methods used for modeling energy savings for multifamily buildings, including energy used in common areas.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the modeled program path.

The state will apply similar energy modeling requirements to multifamily buildings. All contractors will be required to use a DOE-approved energy modeling tool. Contractors will be required to collect data consistent with the Building Audit Template created by DOE's Building Technologies Office and used by cities nationwide. The state will require a minimum set of inputs to the baseline and proposed retrofit models. The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions. Pre- and post-diagnostics will be required as needed depending on the improvement measures that will be implemented.

Section 3.2.4.2: Calculating Measured Energy Savings

61. Describe the energy savings objectives and overall approach for estimating and measuring energy savings at the home and if applicable, portfolio of homes.

- ☐ N/A. The state is not implementing the measured program path.

Our measured program's objective with respect to energy savings is to optimize for:
[ENTER STATE OBJECTIVE (TOTAL ENERGY SAVINGS, BILL REDUCTIONS, GHG REDUCTIONS, ETC.)]

Calculation of Savings

Implementers and/or aggregators will be required to calculate energy savings for the individual home using open-source advanced Measurement and Verification (M&V) software that has been approved by DOE. All qualified contractors/aggregators must be trained and approved to run the software. All approved software will have the ability to normalize metered energy consumption data for the 12 months prior and 12 months after upgrades are made, provide raw and normalized pre- and post- energy usage data, and calculate and report out realized (measured) energy savings using standardized methods. Within a year of launching the measured savings program and no less than every 2 years thereafter, the state will analyze a statistically significant sample or [ENTER NUMBER: X%] of metered energy consumption data submitted and compare its own analysis and measured savings calculations with those submitted to ensure that the contractor/aggregator is correctly applying the advanced M&V software and correctly measuring energy savings. The savings will be based on at least 12 months of post-retrofit energy consumption data.

Data requirements

For aggregators that submit a portfolio of homes, they must provide all required information for each individual home and provide the analysis used to aggregate the data and develop the final savings and rebate amount.

Sound Scopes of Work

As with all efficiency projects, the state wants building owners to get good advice regarding the types of improvements that make sense for their homes, including how different measures will affect utility bills, comfort, indoor air quality, moisture. The state also wants to ensure that the predicted savings estimates are generally consistent with the realized savings.

On at least an annual basis (but no sooner than after 12 months of data has been received on at least [ENTER NUMBER: X] homes), the state will compare portfolios with at least [ENTER NUMBER: X] homes from different aggregators to ascertain whether certain aggregators are underestimating savings and then realizing greater profits at a significantly greater rate than other aggregators. The response to questions #64 provides additional details on the state's analytical approach to ensuring sensible scopes of work and estimated savings.

Comparison to Modeled Projects

As soon as [ENTER NUMBER: X] projects are completed in both programs⁶ (the state will review the scopes of work performed by those using measured vs. modeled approaches. This type of analysis will be repeated after [ENTER NUMBER: X] projects are completed in both programs on an ongoing basis. Should the state find concerning discrepancies (e.g., that measured energy projects are investing much less in envelope improvements), the state may require contractors using the measured savings approach to do more extensive data collection, consistent with the assessment requirements for modeled savings projects. This information would allow the state and its implementer(s) to assess whether important energy savings

options are not being pursued where warranted (e.g., homes without sufficient envelope not including envelope improvements).

62. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the measured program path.

The state will apply standard conversion factors to calculate kWh equivalents as noted in the following chart.

Fuel	Measured Energy Rate	Convert to kWh
Natural Gas	therm	kWh = therm * 29.3
Propane	gallon	kWh = gallons * 26.8
Fuel Oil	gallon	kWh = gallons * 43.9

[IF THE STATE IS PROPOSING TO USE SOURCE (RATHER THAN SITE) ENERGY SAVINGS AS ONE OF ITS METRICS, INCLUDE A STATEMENT SUCH AS THE FOLLOWING]:

For any instances where the state will calculate source energy savings, site electricity will be converted to source energy by applying the relevant location-specific factor provided by eGRID (EPA: <https://www.epa.gov/egrid>).

63. List the open-source advanced M&V software(s) the state requests to use and confirm that each meets program requirements.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the measured program path.

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state will be using the [ENTER NAME OF SOFTWARE] authorized for use by DOE that can determine and document weather-normalized energy use of a home or portfolio of homes before and after the implementation of home energy upgrades. The software can estimate energy savings based on the data and information collected in the home assessment and will define, calculate, and report energy savings for the purposes of the rebate threshold as kWh or kWh equivalent.

OR

⁶ For measured savings projects, project "completion" refers to the point at which the contractor/aggregator submits usage data and applies for the rebate reimbursement.

[OPTION 2:] The state proposes to use the [ENTER NAME OF SOFTWARE] methodology and will coordinate with DOE for review and approval which the state believes fulfills all program requirements.

64. Describe how the state will monitor and ensure that aggregator portfolios meet the program requirements and minimum savings thresholds for the measured program path.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the measured program path.

When an aggregator submits data to support their request for remittance of rebate reimbursements, the state will analyze how the portfolio savings compares to the predicted savings reflected in the rebates applied to the projects at point of installation.

To ensure that measured savings calculations are done properly, the state will randomly select a statistically significant number of homes across all of the measured energy savings projects and do our own analysis of pre- and post- utility bills to compare our savings analyses with those of the contractors/aggregators. The state will apply standard weather normalization techniques and determine whether there are significant discrepancies between our analyses and those submitted by contractors/aggregators.

As explained in response to question #13a and #61, in order to ensure that contractors/aggregators are not systematically underestimating savings in order to receive greater profits, the state will randomly select a statistically significant number of homes within a portfolio to determine whether the rebate applied at that home is consistent with the amount of savings that the home realized on their bills. For example, if a rebate equivalent to 20% savings was applied at point of installation for the homeowner, the state will see how the actual savings realized at that home compares to the prediction of 20%. The state will evaluate aggregators' performance based on the following:

- (1) How do the realized savings for a portfolio (which affect how much the aggregator is reimbursed) compare to the original predicted savings for that portfolio (which affect how much is deducted off the residents' or building owners' project invoices)?
- (2) On an individual home basis, how does the amount of rebate a homeowner received (based on predicted savings) compare to the actual savings they realized in terms of reduced energy usage?

If either (1) or (2) are deemed to be problematic in terms of discrepancies, the state will either work with the aggregator to rectify the problems or not allow them to continue participating in the program. If the aggregator does not adjust their savings predictions to be in line with the response provided to question #13(a) within [ENTER PERIOD OF TIME (E.G., 3 MONTHS)] or completion of [ENTER NUMBER: X

(E.G., 20)] additional projects (whichever sooner), the aggregator will no longer be allowed to participate for at least [ENTER PERIOD OF TIME (E.G., 6 MONTHS)].

65. If measuring energy savings within a period of less than 12 months, describe how the state will define and enforce the inclusion of peak seasons.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state will measure energy savings over at least 1 year or the state is not using the measured savings approach.

The state will require analysis/comparison of the 12 months of utility bills prior to the retrofit with 12 months of utility bills post-retrofit. The state will not allow a shorter period of time to substantiate savings.

66. Describe the state's processes for measuring savings for multifamily buildings, including for energy used by common areas.

- ☐ Defer response to State Implementation Blueprint.
- ☐ N/A. The state is not implementing the measured program path.

Our state will refer to the techniques within the DOE approved M&V methodology for measuring savings within multifamily buildings. Within our RFP, the state will require that the implementer have experience with multifamily retrofit programs to ensure expertise in these complex projects.

As with single family homes, 12 months of whole-building utility usage prior to retrofit will need to be compared to 12 months of whole-building utility usage post-retrofit. The state will require providers to use ENERGY STAR Portfolio Manager to aggregate all the usage data for the entire building - including energy used in common areas. The pre- and post-energy usage will be compared for the building overall, not disaggregated by units, common areas, or other end uses.

Section 3.2.5: Consumer Protection through Quality Assurance

67. Certify that the state will prepare and implement a Consumer Protection Plan in accordance with the requirements (Section 3.2.5) and that the state rebate program will not launch until receiving DOE approval.

- ☒ Yes, the state confirms the above statement.

Section 3.2.6: Post-Installation Certificate

68. Describe how each of the certification requirements (Section 3.2.6 of the [Program Requirements and Application Instructions](#) document) will be met for single-family homes.

- ☐ Defer response to State Implementation Blueprint.

The state will design a certification template which will include, at a minimum:

- A list of all work performed including details of installed equipment and materials;
- Projected energy savings to support the accurate valuation of the upgrade; and,
- A Home Energy Score.

A Home Energy Score Report documenting the home's energy-related assets before and after upgrades will be required as an attachment accompanying the certificate. Depending on the template design, the Home Energy Score value and/or scale will either be incorporated into the certificate or simply included in the Home Energy Score Report.

The certificate or a cover page accompanying it will include the DOE logo (per DOE usage guidelines) and recognition that the work performed was funded in part (or in full) through Home Energy Rebates provided under the Inflation Reduction Act of 2022. The state will provide a mock-up of these materials to DOE for review prior to launch. [THE FULL PROCESS FOR USING AND REQUESTING PERMISSION TO USE THE DOE LOGO, SEAL OR WORK MARK BY A NON-DOE ENTITY CAN BE FOUND HERE: [DOE LOGO, SEAL AND WORD MARK | DEPARTMENT OF ENERGY](#)]

Because our program implementer is not the contractor and is not compensated based on savings results, the state will rely on the implementer to serve as the qualified third-party certifier. Depending on our program delivery design, the state and its implementer may elect to use other qualified entities or individuals (e.g., Home Energy Score Assessors), unrelated to the contractor performing the work, to certify the project and issue the certificate to the household. The state's program guidelines will include clear instructions to certifiers on what they must confirm and verify with respect to each project and how to provide the certification to the household. It will also describe the minimum qualifications of certifiers.

69. Describe how each of the certification requirements (Section 3.2.5 of the [Program Requirements and Application Instructions](#) document) will be met for multifamily buildings.

☐ Defer response to State Implementation Blueprint.

As with single family projects, our implementer will design a template for the certification which will include, at a minimum:

- A list of all work performed including details of installed equipment and materials;
- Project energy savings to support the accurate valuation of the upgrade;
- A Home Energy Score (if available for the building type); or an ENERGY STAR Portfolio Manager score (when post-retrofit usage data is available).

The certificate or a cover page accompanying it will include the DOE logo (per DOE usage guidelines) and recognition that the work performed was funded in part (or in

full) through Home Energy Rebates provided under the Inflation Reduction Act of 2022. The state will provide a mock-up of these materials to DOE for its review prior to launch.

Because our implementer is not the contractor and is not compensated based on savings results, our implementer will serve as the qualified third-party certifier.

Our program guidelines will include clear instructions to certifiers on what they must confirm and verify with respect to each multifamily project. To inform households within a multifamily building, the owner will be required to post (for no less than 6 months) the certificate in a public place within the multifamily building (e.g., entry, regularly used common space). They will also describe the minimum qualifications certifiers must have.

70. Identify which third-party certificate(s) the state program will offer to homeowners that receive a rebated home energy upgrade.

☐ Defer response to State Implementation Blueprint.

Consistent with our earlier response, the state will create a standard design template and specifications regarding the required content on the certificate and accompanying materials. If the state identifies existing certificates used by other efficiency programs and providers, the state may allow alternative certificate designs that adhere to our specifications. Regardless of the template, by including the Home Energy Score in all certificates, the state will be ensuring consistency across all documentation. Further, given that the Home Energy Score is a DOE rating system, the state believes that this metric will hold greater credibility and be more easily translated and valued at point of sale, thereby giving the homeowner even greater benefit.

Maximizing Rebate Impact

Section 3.3.1: Supporting the Clean Energy Economy Through Market Transformation

71. Certify that the state will prepare and implement a Market Transformation Plan within the first year after receiving the financial assistance award.

☒ Yes, the state confirms the above statement and will provide the plan with this narrative document.

Section 3.3.2: Integrating with Other Programs

72. Identify whether the state plans to take proactive steps to encourage integration with other programs. If so, identify with which programs the state will actively seek to integrate. The state may include letters of support or other indicators of commitment from existing program partners. Applications should identify whether programs will be integrated in any or the following areas:

- Integration into existing program administration, website, materials.
- Adoption of existing program standards, QA, workforce standards, or other practices.

- Braiding or co-funding of upgrades within individual households.
 - Other integration elements, as applicable.
- ☐ N/A. The state does not plan to integrate the rebates into any existing programs.

[ONLY RESPOND IF NOT CHECKING N/A ABOVE. FOR THIS RESPONSE, PLEASE INCLUDE THE FOLLOWING: SPECIFIC PROGRAMS THAT WILL BE INTEGRATED WITH THE HOME ENERGY REBATES.

HOW REBATES WILL BE MANAGED ACROSS THE PROGRAMS?

HOW IS THE STATE ADDRESSING QUALIFICATIONS AND REQUIREMENTS THAT DO NOT EXACTLY ALIGN WITH THE HOME REBATES PROGRAM?

- WHAT INFORMATION IS BEING PROVIDED TO CONTRACTORS THAT WILL BE NAVIGATING BOTH PROGRAMS. WHAT TRAININGS MAY BE PROVIDED?
- WHAT TOOLS, SYSTEMS, DOCUMENTS, MARKETING MATERIALS, OUTREACH, VERIFICATION, QA, AND/OR REBATE PROCESSING ARE BEING COORDINATED OR INTEGRATED WITH EXISTING PROGRAMS?]

The state plans to integrate the Home Efficiency Rebates with the following program(s):

[INCLUDE ONE OR MORE OF THE FOLLOWING OR DESCRIBE OTHER RELEVANT PROGRAMS]

- To the extent feasible given restrictions in combining federal grants and rebates, as one portion of our rebates, the state plans to leverage our state-funded weatherization programs to deliver expanded whole-home energy efficiency services to low-income households in our state.
- As one method for delivering these rebates, the state plans to leverage our utility programs. These non-federally funded programs already have qualified contractors delivering whole home retrofits and are therefore well suited to deliver the efficiency rebates as well.

By integrating the Home Efficiency Rebates with [ENTER PROGRAM NAME(S)], the state will build on existing consumer education materials, quality assurance activities, and workforce qualifications. For example, [ENTER PROGRAM NAME(S)] has well established quality assurance efforts which can be carried out in concert with the QA needed for ensuring effective use of the Home Efficiency Rebates. As another example, [ENTER PROGRAM NAME(S)] has well established workforce standards that the state may adopt as either a minimum standard or one acceptable method for becoming a qualified contractor for the rebate program.

Regardless of whether the state can fully integrate home energy rebates into our existing programs, the state will be sure that any program co-funding or braiding comply with all DOE requirements including the [Program Requirements & Application Instructions](#) document.

73. Describe how the state program will support households, contractors, aggregators, and other stakeholders in understanding how the state program may leverage other program resources.

☐ Defer response to State Implementation Blueprint.

Prior to launching this rebate program:

- The state will work with relevant state membership associations and industry groups to conduct outreach via webinars and emails to program administrators and contractors (e.g., home performance, HVAC, plumbers, insulation installers, etc.) about allowable braiding and co-funding of measures and upgrades.
- The state will work with consumer education organizations, community-based organizations, retailers, manufacturers, and others to provide reliable information to homeowners and building owners. The state will make information available at large public forums (e.g., county fairs, festivals) as well as at retail locations.
- The state has engaged with the following utilities [INCLUDE LIST] to collaborate and leverage existing communications, trainings, and marketing channels to amplify the message of the Home Energy Rebates. This includes media, mailers, emails, talking points and follow up info for customer service call centers, leave-behind materials at trainings and trade ally network gatherings and direct engagement with utility implementers.
- The state will make information available on our web site and through commercial business-oriented organizations (e.g., Chamber of Commerce, trade associations) to reach potential aggregators; firms that may be interested in providing short-term loans to contractors to allow them to “float” costs prior to being reimbursed for rebated services; and entities that may want to do purchases on behalf of the contractors and then be reimbursed through the rebate processing system (in accordance with all requirements).

74. Describe the method(s) the state will use to ensure the total combination of all immediate upfront funding sources (federal grants, federal loans, and non-federal funding) provided to a project does not exceed the total project cost.

☐ Defer response to State Implementation Blueprint.

The state will educate contractors (and consumers) regarding the restriction of applying incentives that exceed total project cost. All contractors on the qualified contractor list will be given a pre-launch set of materials including information regarding the restrictions on braiding and the restriction that total upfront incentives cannot exceed the total project cost.

When a homeowner or building owner initiates the process by requesting a rebate, they will be required to confirm that they understand the following:

A homeowner or building owner is not eligible for rebate funds that in combination with other incentives exceed the total project cost. A homeowner must inform their contractor of other incentives that they are receiving toward the cost of the project. The contractor will then apply this

rebate toward any remaining costs not covered by the other incentives and show that deducted amount on their invoice to be signed by the homeowner.

The contractor will also require the homeowner or building owner to sign an affidavit stating that they did not receive funds in excess of the total project costs.

Finally, the state will require contractors to list all applied incentives on the invoice that must be sent to the state/implementer in order to receive reimbursement for the Home Efficiency Rebate applied at point of installation/service.

75. Describe how the state program will support contractors and retailers in preparing acceptable invoices that may be kept as program records.

☐ Defer response to State Implementation Blueprint.

All contractors will be required to complete a brief on-line training session before being placed on our qualified contractors list. Only contractors included on that list will be eligible to be reimbursed for Home Efficiency Rebates applied at point of service/installation. The training will detail all prescribed components of invoices as well as the reporting system that contractors will need to use to submit required information and documentation (including invoices). As part of the training session, the contractor will be asked to complete a "mock" request for reimbursement which will include entering all relevant invoice information, uploading a "signed" invoice, and any other requirements.

Implementers will be required to review all submitted information from delivered projects prior to reimbursing contractors or retailers. The state intends to use the DOE workflows which include quality assurance and review steps as well as opportunities for contractors to submit any missing information should their documentation be initially rejected by the implementer.

In the event of an audit, the implementer or the state will be able to promptly provide all invoice documentation since it will be submitted electronically through the [DOE Rebate Tracking System](#) by retailers that use the API and submitted through a separate user interface for contractors or smaller retailers that will upload the information manually. All of these records will be retained by the implementer, and the majority of this information will already be provided to DOE.

76. Describe how the state implementer(s) will produce invoice documentation in a timely manner upon request in the event of an audit by DOE, the DOE's Inspector General, a state's inspector general, or another entity.

☐ Defer response to State Implementation Blueprint.

The user interface developed for applying and processing rebates will allow contractors and aggregators to submit invoices as PDFs as well as through data entry of required information. The implementer will collect and retain all invoice data electronically. This information will also go directly to DOE via the API associated with the [DOE Rebate Tracking System](#) and can be used by DOE should

audits arise. The state will also be able to readily export the invoice documentation to others that may initiate audits.

77. Describe how the state will ensure rebate recipients be made aware of the portion of the funding received from the DOE Home Efficiency Rebates.

☐ Defer response to State Implementation Blueprint.

The state will use the [DOE Rebate Tracking System](#) and workflows which include multiple notifications to all participants including homeowners and building owners regarding the level of DOE Home Efficiency Rebates available and applied. Contractors will be required to provide a line item showing the level of rebate applied on invoices that must be signed by the homeowner or building owner. Without this documentation, contractors will not be reimbursed.

Section 3.3.3: Quick Starts

78. Identify whether the application is for a Quick Start program. For Quick Start programs, identify the timeline for program launch. [\[SELECT ONE\]](#)

☐ Yes, this is for a Quick Start Program [\[PROVIDE TIMELINE BELOW\]](#).

☒ No, this is not for a Quick Start Program.

Appendix

Home Efficiency Rebates

Measured and Modeled Rebate Levels

Table A-1. Modeled Savings Rebate Levels

Single-Family		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	Less than 80% AMI*	Lesser of \$4,000 or 80% of project cost
	80% AMI and greater	Lesser of \$2,000 or 50% of project cost
35% or greater	Less than 80% AMI*	Lesser of \$8,000 or 80% of project cost
	80% AMI and greater	Lesser of \$4,000 or 50% of project cost
Multifamily		
Modeled Energy Savings	Income Level	Rebate Amount
20%-34%	A building with at least 50% of households with incomes less than 80% AMI*	Lesser of \$4,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$2,000 per dwelling unit up to \$200,000 per building
35% or greater	A building with at least 50% of households with incomes less than 80% AMI *	Lesser of \$8,000 per dwelling unit or 80% of project cost
	A building with at least 50% of households with incomes 80% AMI and greater	\$4,000 per dwelling unit up to \$400,000 per building

*States may increase the maximum amount available for low-income households upon approval from DOE.⁷ See Section 3.1.3 for details.

⁷ 42 U.S.C. 18795(c)(3).

Table A-2. Measured Savings Rebate Levels

Single-Family		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	Less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use for the average home in the state or 80% of project cost*
	80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use for the average home in the state or 50% of project cost
Multifamily		
Measured Energy Savings	Income Level	Rebate Amount
15% or greater	A building with at least 50% of households with incomes less than 80% AMI	kWh, or kWh equivalent, payment rate equal to \$4,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 80% of project cost**
	A building with at least 50% of households with incomes 80% AMI and greater	kWh, or kWh equivalent, payment rate equal to \$2,000 for a 20% reduction of energy use per dwelling for the average multifamily building in the state or 50% of project cost

*Per statute, the measured energy saving of the home or portfolio of homes must achieve 15% savings, but the calculation of the rebate is based on a 20% reduction of average home energy use of a home in the state.

**States may increase the maximum amount available for low-income households upon approval from DOE.⁸ See Section 3.1.3 for details.

⁸ 42 U.S.C. 18795(c)(3).

Federal Programs Approved for Categorical Eligibility

Table A-3. Recognized Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Eligible for Higher Level of Home Efficiency Rebates
Low Income Home Energy Assistance Program (LIHEAP)	X
Medicaid	X
Supplemental Nutrition Assistance Program (SNAP)	X
Head Start	X
Lifeline Support for Affordable Communications (Lifeline)	X
Food Distribution Program on Indian Reservations (FDPIR)	X
National School Lunch Program – Free (NSLP)	X
Housing Improvement Program (HIP)	X
Housing Opportunities for Persons with AIDS	X
Supplemental Security Income (SSI)	X
Weatherization Assistance Program (WAP)	Automatically eligible ONLY if household is located in an area where 80% AMI (Area Median Income) is greater than 200% Federal Poverty Level (FPL)
WIC	Automatically eligible ONLY if household is located in an area where 80% AMI is greater than 185% FPL.
Other (programs approved by DOE through state application process)	States may propose other income-verified programs for categorical eligibility in their applications. DOE will approve if those income criteria meet the Home Energy Rebates income criteria set forth in the Inflation Reduction Act.

Table A-4. Recognized Housing Programs for Categorical Eligibility of Home Efficiency Rebates

Recognized Program	Level of Categorical Eligibility for Rebates for Renters Receiving Housing Assistance	Whole Building Eligibility for Rebates
Public Housing (housing owned and operated by Public Housing Authorities)	Below 80% AMI	Single- and multi-family buildings owned and operated by Public Housing Authorities are fully eligible.
Privately owned multifamily buildings receiving project-based assistance (Section 8, Section 202, Section 811)	Below 80% AMI	If at least 50% of housing units are subsidized through these programs, then the multifamily building is fully eligible.
Privately-owned multifamily buildings that house residents receiving tenant-based assistance	Below 80% AMI	If at least 50% of building occupants receive tenant-based assistance, then the multifamily building is fully eligible.
Low Income Housing Tax Credit (LIHTC)	Below 80% AMI	If at least 50% of housing units are income-restricted, then the multifamily building is fully eligible.