



Home Efficiency Rebates (IRA Section 50121): Data Access Plan Introduction

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The Purpose of this document is to provide basic information to states to understand the Data Access Guidelines, Data Access Plan requirements, and selecting the pathway for customer consent.

Energy consumption data is fundamental to the Home Efficiency Rebates Program (Section 50121), but not required for the Home Electrification and Appliance Rebates Program (Section 50122). The Inflation Reduction Act (IRA) Section 50121 (Homes - measured and modeled) requires energy consumption data be used to calculate energy savings and the associated rebate¹. *Energy consumption in this context is the metered electricity or natural gas, which is used for utility billing.* IRA Section 50122 rebates **do not** similarly require access to energy consumption data. As such, this document focuses on the Section 50121 program.

Energy consumption data is required for program implementation efforts, but not for pre-participation targeting purposes. Consumption data is required for program needs during and/or after homeowner/building owner participation, including implementation, reporting, or evaluation purposes. These data are required to be collected and provided to DOE as part of the [Home Energy Rebates Programs Requirements & Application Instructions](#), see Section 3.1.6.3. Energy consumption data² can also be used for marketing purposes, such as targeting homeowners and building owners prior to their awareness or engagement with the program, but this activity is optional.

States must collect consumption data for the Measured program and for the Modeled, Single-Family program.³ States must collect utility consumption data if they are offering the Homes-Measured program, in either single-family or multifamily. For Homes-Modeled, energy

¹ IRA section 50121 Modeled, “[h]ome energy efficiency retrofit that are calibrated to historical energy usage for a home consistent with BPI 2400, for purposes of modeled performance home rebates”; and IRA section 50121 Measured, “[d]ocumenting the monthly and hourly (if available) weather-normalized energy use of a home before and after the implementation of a home energy efficiency retrofit, for purposes of measured performance home rebates[.]”

² Consumer energy bills can help states identify high energy users to better target and engage with potential program participants.

³ See section 3.2.4 of the [Home Energy Rebates Programs Requirements & Application Instructions](#).



consumption data is required for single-family homes; states may request exceptions for multifamily, delivered fuels, adding cooling load and occupancy of less than 1 year.⁴

What are the options to collect utility bills? Most states⁵ will likely collect energy consumption data based on customers opting in to allow their data to be shared. Your state has several options to collect consumption data. Below is a list of options, from easiest to hardest from an implementation perspective:

- 1) **Green Button and/or EPA's Portfolio Manager.** Leverage established utility agreements with Green Button⁶ (single-family and master-metered multifamily) or EPA's Portfolio Manager⁷ (individually-metered multifamily).
- 2) **Collect from Utilities.** Coordinate with utilities to provide data needed for the program. This may include creating direct agreements to collect data for program purposes or working with state regulators to encourage utilities to provide this data.
- 3) **Collect from Residents/Owners.** Collect the data directly from residents and building owners. This could take the form of requesting copies of bills or providing portal access to energy consumption data.

More Information/References:

- **Section 50121 Requirements and Guidelines:** As described in Section 3.2.3 of the [Home Energy Rebate Programs Requirements & Application Instructions](#), for Section 50121 programs, States must develop and submit a Utility Data Access Plan that contains information on safety and security protocols and consumer consent processes.
- **Data Access Guidelines.** The [Utility Data Access Guidelines](#) were required by law for Section 50121 (i.e., Homes Modeled and Measured), but **are not required** for Section 50122.⁸ These Guidelines include best practices for data access and sharing and recommendations for developing a comprehensive Data Access Plan.

For more information about pathways and for a Data Access Plan Template: [IRA Section 50121 Home Efficiency Rebates: Data Access Pathways Background and Plan Templates](#).

⁴ For the Modeled program, there are multiple exceptions to the BPI-2400 calibrated modeling, including multifamily, delivered fuels, adding cooling load and occupancy of less than 1 year. Program requirements allow states to request an alternative approach where savings estimates show portfolio-level results within 10% of BPI-2400 modeling. See section 3.2.4.1.1.

⁵ Some states have a law or requirement that utilities must provide billing data to third parties, these are called "Open Access" or "Opt-out" pathways, (e.g., California and New York) and are not common. See [[IRA Section 50121 Home Efficiency Rebates: Data Access Pathways Background and Plan Templates](#)] for more info.

⁶ Refer to the list included for examples of utilities that have committed to implementing Green Button: <https://www.energy.gov/data/green-button>.

⁷ For more information, see EPA's [interactive map](#) of utilities offering streamlined access to energy data for benchmarking.

⁸ IRA section 50121 states "[t]he Secretary shall develop and publish guidelines for States relating to residential electric and natural gas energy data sharing. 42 U.S.C. 18795(c)(5). IRA section 50122 does not include a similar requirement for data sharing guidelines.