



Home Efficiency Rebates Program: Sample Application Responses and Guidance with Tracked Changes

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Modification Note: This version modifies sample responses for several of the questions below (changes from Version 1.1 are highlighted in yellow). This version also makes clerical fixes.

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	9
Section 3.1.3: Low-Income Homes	26
Section 3.1.4: Community Benefits Plan	40
Section 3.1.5: Processing and Delivering Rebate Funds to Eligible Rebate Recipients....	42
Section 3.1.6: Data Collection and Evaluation	46
Consumer Experience.....	51
Section 3.2.1: Outreach and Education Strategy	51
Section 3.2.2: Home Assessments	51
Section 3.2.3: Access to Residential Utility Data	55
Section 3.2.4: Project-Specific Energy Savings Calculations	55
Section 3.2.4.1: Calculating Modeled Energy Savings.....	56
Section 3.2.4.2: Calculating Measured Energy Savings	67
Section 3.2.5: Consumer Protection through Quality Assurance.....	75
Section 3.2.6: Post-Installation Certificate.....	75
Maximizing Rebate Impact	78
Section 3.3.1: Supporting the Clean Energy Economy Through Market Transformation.....	78
Section 3.3.2: Integrating with Other Programs.....	78

Appendix	84
Home Efficiency Rebates	84
Measured and Modeled Rebate Levels.....	84
Federal Programs Approved for Categorical Eligibility	86

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 (blue text) as needed to describe their intended approach. If a state believes the sample response provided by DOE reflects what the state intends to do and submits a verbatim response, DOE will seek confirmation from that state that they fully intend to do what is written.
- Many questions will have responses that will vary depending on a states' program design, polices and program objectives. In these cases, DOE provides prompts (RED SMALL CAPS TEXT) that provides guidance on what type of information should be included to fulfill the requirement of the questions.
- 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, including questions that can be deferred to the Implementation Blueprint. 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.

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 Energy Rebate Program Requirements & Application Instructions](#)–Issued July 27, 2023. Last updated October 13, 2023.

- Applicants can also find other helpful resources and recommended approaches on the Recommendations for Home Energy Rebate Program Administrators webpage.

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, for a total administrative fund annual cost of [ENTER NUMBER: \$X] (see also 1.a below):

- 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 50121 and 50122 awards. Our accounting systems can separately track these different funding sources and internal policies are in place to ensure the time is accurately tracked.
- Development of tools and systems **for program administration**, including websites, applications, rebate processing, and reporting [ENTER TOTAL \$X OR \$X PER PROJECT]
 - The state plans to fund a program implementation contractor 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. In addition, the state plans to fund the implementation contractor or other qualified entity to connect rebate systems to the DOE Rebate Tracking and Reporting Tool application programming interface (API) for real-time reservations and redemptions and to support required data reporting to DOE.

- Depending on the interest of other state agencies with low-income programs, the state may also fund an IT firm to develop an 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]
 - The state will conduct the required customer satisfaction questions included in the program requirements. The state is also planning to conduct a process and impact evaluation, which is described in Question 47. 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 and email inbox 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, 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, for a total rebate fund annual cost of [ENTER NUMBER: \$X] (see also 1b below):

- Rebates for whole-home energy efficiency projects [ENTER TOTAL \$X OR \$X PER PROJECT]
- Disadvantaged community incentives [PROVIDE ADDITIONAL INFORMATION IN RESPONSE TO QUESTION 2; ENTER TOTAL \$X OR \$X PER PROJECT]; and,

- The proposed set of activities listed in the response to Question 2. [ENTER TOTAL \$X OR \$X PER PROJECT]

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

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

CHOOSE ONE OF THE FOLLOWING:

OPTION 1: ENTER \$X BASED ON 20% OR LESS OF THE STATE'S REBATE FUNDS FOR 50121 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).]

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

[INCLUDE ~~ESTIMATE~~ THE AMOUNT (IN DOLLAR OR PERCENTAGE) OF REBATE FUNDS THAT WILL BE APPLIED TO PROJECT-RELATED COSTS EACH YEAR. IN ESTIMATING THIS AMOUNT, 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.]

NOTE: ALL ADMIN FUNDS SHOULD BE USED FIRST BEFORE SUBMITTING A REQUEST FOR THESE FUNDS THAT INCLUDES A JUSTIFICATION ON TAB J IN THE BUDGET JUSTIFICATION WORKBOOK.]

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

[DESCRIBE PROJECT-RELATED COSTS THAT THE STATE PROPOSES (SUBJECT TO DOE APPROVAL) TO USE FROM 50121 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 AS WELL AS BELOW.

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, 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:

- (1) Equipment, tools, models, and procedures used to assess a home and estimate energy savings [ENTER NUMBER: \$X]
- (2) Equipment, tools, models, and procedures used to verify installations and perform quality control including inspections and reporting [ENTER NUMBER: \$X]
 - The state needs to procure [ENTER SPECIFIC TYPE OF EQUIPMENT] to verify quality installation.
- (3) Customer service support [ENTER NUMBER: \$X]
- (4) Consumer protection functions including consumer feedback, project verification, and inspections [ENTER NUMBER: \$X]
- (5) Income Eligibility [ENTER NUMBER: \$X]
 - Depending on the level of interest of other agencies with low-income programs in the 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.
- (6) Disadvantaged community delivery, including targeted marketing and outreach [ENTER NUMBER: \$X]
 - The state would like to provide individualized assistance to households in disadvantaged communities if warranted, depending on the uptake of rebates in these areas.
- (7) Disadvantaged community incentives (see Section 3.1.4) [ENTER NUMBER: \$X]

- o 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 NUMBER: \$X] for installer incentives.
- (8) Integration with existing programs, home energy assessments, and project scoping [ENTER NUMBER: \$X]

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 THAT WILL ENSURE REBATE MINIMUMS AND ADMINISTRATIVE MAXIMUMS ARE ADHERED TO, PROCESS CONTROLS, WHAT SYSTEMS STATES INTEND TO USE (E.G., WILL BE USING DOE'S REPORTING AND TRACKING TOOL API), HOW SYSTEMS BEING DEVELOPED WILL ASSIGN REBATE AMOUNTS TO PRODUCTS, HOW SYSTEMS WILL TRACK ADMINISTRATIVE COSTS AND REBATE FUNDS EXPENDED, AND HOW THE STATE WILL TAKE A NUMBER OF STEPS TO REDUCE THE COSTS OF ADMINISTRATION AND PROJECT-RELATED ACTIVITIES MAY ACCOUNT FOR HIGHER ADMINISTRATIVE RATIOS IN THE EARLY YEARS OF THE PROGRAM RELATIVE TO LATER YEARS.]

Budgeting and Forecasting Tools

To ensure that rebate minimums and administrative maximums are adhered to throughout the program, the state will utilize a combination of budgeting and forecasting tools. The state plans to use the DOE Rebate Tracking System to minimize the costs of data tracking and reporting. By making use of the DOE Rebate Tracking and Reporting Tool, which offers an API (available to states, vendors, modeling tools, etc.), the state will dramatically reduce the need for repeated that can be integrated with the [CHOOSE ONE: STATE'S OR IMPLEMENTER'S] existing systems. This integration will minimize data entry errors, reduce administrative costs, and ensure data consistency by adhering to DOE/PNNL data specifications. The system will assign rebate amounts to products based on the applicant's income level (e.g., below 80% Area Median Income (AMI)) and the modeled or measured savings associated with allowable improvements.

Process Controls and Systems

The state will implement process controls to track administrative costs and rebate funds expended. The state will utilize the DOE Rebate Tracking and Reporting Tool's database that contains all previously issued rebates to individual residential dwellings, ensuring that rebates are not duplicated for the same address. The system will also track the amount of rebate funds committed to date and only approve new requests if sufficient funds remain. When a household receives its final invoice and the rebate is issued, the amount will be updated via connection to the DOE Rebate Tracking and Reporting Tool. The state will monitor these rebate amounts relative to administrative spending forecasts.

Administrative Efficiencies and Accounting Practices

To reduce the costs of administration and project-related activities, the state will investigate systems that use "smart" technology to automatically read uploaded documents for income verification and/or other purposes. For example, the state

aims to use a system 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 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 [ENTER NUMBER: X] 5 years through the subcontractor [ENTER NAME]. [DESCRIBE YOUR ACCOUNTING PRACTICES IN 1-2 SENTENCES.]

By implementing these budgeting and forecasting tools, process controls, and accounting practices, the state will effectively manage and ensure that rebate minimums and administrative maximums are adhered to over the duration of the program.

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% AML) 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).

4. Confirm that the state will have a process for handling returns of rebated items as applicable in the Consumer Protection Plan.

☒ Yes, the state confirms the above statement.

Section 3.1.2: Rebate Conditions and Levels

5. 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](#))

Note: States may increase the maximum rebate amounts available for low-income households, but states cannot set lower rebates than specified in Section 3.1.2.

[NOTE: IT IS RECOMMENDED TO PROVIDE THIS INFORMATION IN A TABLE OF MAXIMUM REBATE AMOUNTS AND PERCENT OF PROJECT COST ALLOWED FOR RELEVANT PROGRAM COMBINATIONS: SINGLE FAMILY/MULTIFAMILY, SAVINGS THRESHOLDS, LOW-INCOME HOUSEHOLDS - SEE PROGRAM REQUIREMENTS SECTION 3.1.2.1.]

IF STATE IS REQUESTING AN INCREASE IN MAXIMUM FOR LOW-INCOME HOUSEHOLDS, PROVIDE VALUES IN THIS RESPONSE AND JUSTIFICATION IN QUESTION 13.

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:

Modeled Path. For households with incomes greater than 80% AMI, our state will use the maximum levels noted in [Appendix Table A-1](#). See our response to Question 13 for information on rebate maximums available to households with incomes less than 80% AMI.

Single Family			
Modeled Energy Savings	Income Level	Rebate Amount	State Proposed Limit: Rebate Amount Not to Exceed or % of Project Cost Not to Exceed
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	State Proposed Limit: Rebate Amount Not to Exceed or % of

			Project Cost Not to Exceed
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.			

IF USING THE MEASURED APPROACH:

Measured Path. For households with incomes greater than 80% AMI, our state will use the maximum levels noted in [Appendix Table A-2](#). [BASED ON PROGRAM GOALS AND PRIORITIES, STATES MAY CHOOSE TO IMPOSE A CAP ON THE REBATE AMOUNT PER DWELLING UNIT.] See our response to Question 13 for information on rebate maximums available to households with incomes less than 80% AMI.

Single Family			
Measured Energy Savings	Income Level	Rebate Amount	State Proposed Limit: Rebate Amount Not to Exceed or % of

			Project Cost Not to Exceed
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	State Proposed Limit: Rebate Amount Not to Exceed or % of Project Cost Not to Exceed
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	
<p>* 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 an in the state.</p> <p>† States may increase the maximum amount available for low-income households upon approval from DOE.</p>			

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

☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD PROVIDE A LIST OF ALLOWABLE PROJECT COSTS. RESPONSE SHOULD BE CONSISTENT WITH JUSTIFICATION WORKBOOK COSTS ~~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, THEN 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.]

When the rebate is based on total project costs, the state will allow the following project costs if documented on the invoice:

- Labor costs
- Equipment and material costs
- Permitting fees
- Certification fees (for certification of homes or mechanical system sizing and commissioning, if applicable and required by local jurisdiction, state, or DOE)

We confirm that these costs do not duplicate allowable project-related costs and are aligned with the Budget Justification Workbook.

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.

7. List the documentation requirements related to project costs from homeowners, contractors, and/or aggregators.

☐ Defer response to State Implementation Blueprint

[RESPONSE SHOULD DESCRIBE THE PROJECT-COST-RELATED REQUIREMENTS FOR DOCUMENTATION PROVIDED BY ELIGIBLE ENTITIES AND ELIGIBLE ENTITY REPRESENTATIVES, INCLUDING BUT NOT LIMITED TO: PROJECT INVOICE, FINAL PROJECT COST, EQUIPMENT AND MATERIALS COST, INSTALLATION COSTS.]

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

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

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

8. 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.

[RESPONSE SHOULD DESCRIBE HOW THE PROGRAM WILL INFORM HOMEOWNERS AND BUILDING OWNERS OF OTHER PROGRAM FUNDING, E.G.:

- MARKETING AND LEAVE-BEHIND MATERIALS FROM CONTRACTOR
- MAIL, EMAIL, EVENTS, AND UTILITY WEBSITES
- LOCAL NON-PROFITS
- OTHER STATE/LOCAL PROGRAMS WORKING IN SIMILAR MARKETS
- UTILITY COORDINATION]

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 and will look to develop a unified, "one-stop shop" outreach campaign that streamlines the education process.

This will include:

- Integrating program information into existing state and utility websites, webinars, presentations, and public events aimed at both consumers and trade partners.
- Developing fact sheets, brochures, and a "Be a Smart Consumer" packet that participating contractors will be required to provide prior to commencing work.
- Sending information electronically to the homeowner or building owner when a participating contractor initiates the rebate request prior to commencing work.
- Including program information in a direct-to-consumer monthly e-newsletter, sent via email.
- Exploring mobile and virtual outreach tools to educate and enroll households into clean energy and energy efficiency programs.

The state will provide additional detail in the State Implementation Blueprint via the Education and Outreach Plan.

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.

9. 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.)

[RESPONSE SHOULD DEFINE A DATE AFTER WHICH PROJECTS MUST BE COMPLETED. THIS DATE MAY BE RETROACTIVE AS LONG AS THEY ARE SUBJECT TO ALL PROGRAM REQUIREMENTS. THIS DATE MAY BE SPECIFIC, RELATIVE TO THE PROGRAM LAUNCH DATE, OR RELATIVE TO THE

PROJECT INITIATION DATE. PLEASE DESCRIBE ANY DIFFERENCES BETWEEN MODELED AND MEASURED, IF APPLICABLE.]

Generally, all projects must be completed after the official launch of the program, which we anticipate to be in the fall of 2024.

For projects initiated prior to the state's program launch:

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 scope of work (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.

10. 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 LMI to non-LMI 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

11. 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.

Valuing savings as part of this plan does not replace or count towards the requirements to demonstrate a minimum percentage energy savings for the household on a modeled or measured basis.

- ☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD DEFINE THE STATE'S STRATEGY FOR PRIORITIZING/REQUIRING RETROFITS BASED ON TIME OR LOCATION OF THE ENERGY SAVINGS OR A REDUCTION IN GHG EMISSIONS.]

[EXAMPLE 1:] The program will value the time, location and GHG emission reduction associated with the energy savings by 1) providing priority to homes with delivered fuels that will have greatest impact to GHG reductions and 2) projects will require both HVAC and envelope upgrades to increase the likelihood that energy savings are coincident with peak demand within the state.

OR

[EXAMPLE 2:] The state will quantify the value of GHG emissions consistent with existing state policy, based on state-specific emissions factors [INSERT VALUES/CALCULATIONS] and the social cost of carbon [OR OTHER MONETIZATION CALCULATION].

[EXAMPLE 3:] The state will value energy savings based on time, location, and GHG emissions by working with local utilities to accurately determine carbon intensity and constraints of the local energy grid, including establishing clear metrics such as the electric grid fuel mix of utilities and grid operators to derive an hourly emission factor (lbs CO₂/kWh) for each utility service territory or geographic region.

Contractors will be provided clear guidance and tools to help estimate emissions and cost impacts of different upgrades based on the hourly energy savings profile of various measures. Our state is choosing to require contractors to present this information to customers. 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.

By applying a monetary value to the impacts of alleviating peak demand in converting energy saving to constrained locations, and the societal cost of carbon (SCC), the state will be able to use these metrics for reporting purposes and potentially adjust rebate levels for measures with the most SCC/kW savings.

[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.

12. 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. Submitted through the contractor, implementer, or aggregator, 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.

[RESPONSE SHOULD INCLUDE (1) A DESCRIPTION OF THE APPROACH TO HOW THE STATE WILL ENSURE QUALIFIED EQUIPMENT BEING INSTALLED IS ENERGY STAR CERTIFIED AND (2) HOW STATE WILL VERIFY INSTALLED ELIGIBLE EQUIPMENT IS ENERGY STAR CERTIFIED.]

Ensuring any qualifying equipment is ENERGY STAR begins with clear education and training of implementers and contractors on the program requirements. Using ENERGY STAR equipment whenever applicable will be a stated requirement in our trade ally participation agreements.

The state 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.

The state will require installers to include geo-coded installation photos of equipment installed including photos of data plates, photos of the installed equipment model numbers (including indoor and outdoor units for split systems), and AHRI certification numbers for all heating, cooling, and water heating projects.

Additionally, the program will conduct desk review of [ENTER NUMBER: X%] of the projects to verify photos match the submitted model numbers. The equipment will then be validated by crosschecking the collected model/AHRI numbers against the ENERGY STAR Certified Product Data Set or AHRI directory. 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.

13. A state interested in offering higher rebate 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. Please provide the amounts below or check N/A if not applicable.

☐ N/A. The state is not offering higher rebates 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 FOR QUALIFYING LOW-INCOME CONSUMERS, RESPOND TO ALL ELEMENTS OF THIS QUESTION.

RESPONSES SHOULD BE CONSISTENT WITH THE STATE'S INPUTS IN THE [BUDGET JUSTIFICATION WORKBOOK](#), TAB "G. OTHER" AND SHOULD DEFINE ANY DIFFERENCES BETWEEN REBATES FOR MODELED AND MEASURED, IF APPLICABLE.

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 LOW-INCOME HOUSEHOLD:

For projects in low-income single and multifamily buildings, with modeled savings 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 recognizes that an increase in the rebate amount for each low-income home will result in fewer homes receiving rebates. To manage this, the state has placed an overall cap of [ENTER NUMBER: \$X] per low-income household. If every Home Efficiency Project applied this ceiling (which is not expected), it would translate to half as many comparable projects. The state believes that [ENTER NUMBER: \$X] provides a reasonable balance by offering a significant portion of the whole-home project cost to be covered by rebates with our program goal of reaching a significant number of households. 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.

For the measured approach, if savings are higher than what was projected, these rebate amounts will be capped at [ENTER NUMBER: \$X OR X%] of the original rebate request based on estimated savings at the time of installation (see Question 14a for further details).

For the modeled approach, 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.

For the measured approach, for households with incomes less than 80% AMI, our state will use the maximum levels noted in Appendix Table A-2. We will allow 100% of the project costs to be met through either (a) the IRA rebate (not to exceed stated dollar amount) or (b) a combination of IRA rebate dollars and other program dollars that may be stacked or braided. If savings are higher than what was projected, these rebate amounts will be capped at 120% of the original rebate

request based on estimated savings at the time of installation (see Question 13.a. for further details).

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.

14. 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, STATE SHOULD DESCRIBE WHAT PORTION OF THE REBATE WILL GO TO THE HOME/BUILDING OWNER COMPARED TO THE CONTRACTOR/AGGREGATOR AND WHETHER THAT VARIES BY SINGLE FAMILY/MULTIFAMILY, SAVINGS THRESHOLD AND/OR INCOME LEVEL (SEE PROGRAM REQUIREMENTS SECTION 3.1.2).]

For the modeled savings approach, the portion of the rebate provided to the homeowner/building owner compared to the contractor/aggregator will vary based on the following factors:

Single-family homes:

- 20-34% savings, less than 80% AMI: 80% to homeowner, 20% to contractor/aggregator
- 20-34% savings, 80% AMI and greater: 70% to homeowner, 30% to contractor/aggregator
- 35%+ savings, less than 80% AMI: 85% to homeowner, 15% to contractor/aggregator
- 35%+ savings, 80% AMI and greater: 75% to homeowner, 25% to contractor/aggregator

Multifamily buildings:

- 20-34% savings, less than 80% AMI: 75% to building owner, 25% to contractor/aggregator
- 20-34% savings, 80% AMI and greater: 65% to building owner, 35% to contractor/aggregator
- 35%+ savings, less than 80% AMI: 80% to building owner, 20% to contractor/aggregator
- 35%+ savings, 80% AMI and greater: 70% to building owner, 30% to contractor/aggregator

For the measured savings approach:

Single-family homes:

- Less than 80% AMI: 80% to homeowner, 20% to contractor/aggregator
- 80% AMI and greater: 70% to homeowner, 30% to contractor/aggregator

Multifamily buildings:

- Less than 80% AMI: 75% to building owner, 25% to contractor/aggregator
- 80% AMI and greater: 65% to building owner, 35% to contractor/aggregator

In all cases, these rebates will be capped at project cost levels consistent with Question 5. In both the modeled and measured savings approaches, the contractor will be required to deduct the rebate amount associated with the projected energy savings when initiating the rebate reservation. The rebated amount must be included on the invoice that the homeowner/building owner must sign before the contractor/aggregator can receive the rebate reimbursement.

For the measured savings approach, the rebate provided to the contractor/aggregator reflects measured savings rather than predicted savings, which may be less or more than the rebated amount provided to the homeowner/building owner. This places a risk/reward on the contractor/aggregator.

Aggregators (or contractors also acting as aggregators for the measured pathway) will be responsible for transmitting the rebate payment to contractors and customers upon project completion (or sooner if provided as an up-front discount).

[DEPENDENT 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.

[ENTER STATE NAME] 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 (see Question 13.a. for further details).

Aggregators (or contractors also acting as aggregators for the measured pathway) will be responsible for transmitting the rebate payment to contractors and customers upon project completion (or sooner if provided as an up-front discount).

- 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.

[FOR MEASURED PROJECTS, RESPONSE SHOULD DEFINE THE CAPS THAT STATES WILL PLACE ON CONTRACTORS/AGGREGATORS IN TERMS OF SAVINGS EXCEEDING THE AMOUNT ASSOCIATED WITH THE REBATE FOR THE HOMEOWNER (E.G., IF A PROJECT'S INITIAL SAVINGS ESTIMATE IS BELOW THE MEASURED SAVINGS REPORTED, WHAT PORTION OF THE ADDITIONAL REBATE AMOUNT WILL GO TO HOMEOWNER VS AGGREGATOR). FOR MODELED PROJECTS, THIS ISSUE MAY NOT OCCUR AND THEREFORE THE RESPONSE CAN INDICATE AS SUCH.]

The state will cap "additional" savings to the contractor/aggregator at [ENTER NUMBER: X%] beyond the original rebate request, either on a portfolio basis or for individual projects, depending on how the contractor/aggregator submits measured savings data for reimbursement.

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. Aggregators are expected to manage these performance risks at the portfolio level, allowing them to serve a broader range of households by mitigating risk through aggregation and scale.

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 provided 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)].

15. 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. IF MEASURED, STATE SHOULD DEFINE A PROCESS FOR RESERVING FUNDS FOR EACH MEASURED PROJECT WITH REASONABLE ASSUMPTIONS AROUND TRACKING RESERVATIONS AND ESTIMATED VS ACTUAL PAYMENTS (E.G., REBATE RESERVATION SYSTEM, OTHER DEFINED BUDGETING AND FORECASTING SYSTEMS TO BE USED BY STATE).]

[EXAMPLE 1:] Our state plans to use the DOE/PNNL workflows and will utilize a state or implementer system that connects via API to the DOE Rebate Tracking and Reporting Tool. 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.

OR

[EXAMPLE 2:] Our state plans to use a project tracking system that will estimate the amount of rebate funds that may be provided after the 12-month measurement

period with the estimated rebate amount, plus a 20% buffer amount in the event the actual measured savings are higher than estimated. Our state will work with the implementer to track the impact of estimated to actual rebates when projects are delivered as a portfolio and how the portfolio totals impact actual rebated amounts. As the program funding is depleted, the state will work with the implementer to closely monitor approved projects and estimated rebate amounts, and the state may require the implementer to hold on approving projects until the state completes analysis to show that the remaining funds are sufficient.

16. 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. IF MEASURED, RESPONSE SHOULD INCLUDE:

- DEFINITION AND SOURCE OF DATA FOR AVERAGE HOME USAGE FOR THE STATE (CONSIDER ENSURING THAT THE AVERAGE HOME FOR THE STATE IS RELEVANT AND SIMILAR TO THE HOMES THAT ARE TARGETED BY THE PROGRAM).
- A PROCESS FOR CALCULATING AVERAGE HOME ENERGY USE FOR THE STATE, AND HOW IT WILL BE INCORPORATED INTO CALCULATING THE REBATE (E.G., USING DOE PAYMENT TOOL CALCULATOR OR OWN STATE METHOD).

[EXAMPLE 1:] The state will calculate the average home energy use in our state's single family and multifamily buildings (per unit in multifamily buildings) using [REFERENCE STATE DATA SOURCE BEING USED TO CALCULATE AVERAGE USAGE]. With this data, 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 percentage point above 15% (the required minimum savings allowed).

OR

[EXAMPLE 2:] The state will be using the ~~calculator tool being Measured Path Payment Calculator~~ provided by DOE to calculate the payment rates.

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

☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD INCLUDE A TIMELINE FOR REBATES BEING PROVIDED TO ELIGIBLE RECIPIENTS (NOTE: FOR MEASURED, THIS SHOULD BE WITHIN 60 DAYS OF SUBMITTING

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.

INVOICES TO THE STATE (PER PROGRAM REQUIREMENTS SECTION 3.1.5); IF MODELED, WITHIN 4 WEEKS OF RECEIPT OF AN ELIGIBLE REBATE APPLICATION (PER PROGRAM REQUIREMENTS SECTION 3.1.5).]

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.

Section 3.1.3: Low-Income Homes

Note: Low-income households are defined as households with less than 80% 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).

18. What portion of the rebate funds will the state reserve for low-income households and multifamily 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.]

19. 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. If the income requirements of identified federal programs fall below 80% AMI, applicants enrolled in a program that qualifies them as categorically eligible do not need to provide this income information.

20. 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) [demonstrate 80% AMI < 200% Federal Poverty Level (FPL) if using to qualify for higher rebates.]
- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) [DEMONSTRATE 80% AMI < 185% FPL IF USING TO QUALIFY FOR HIGHER REBATES.]

- ☐ 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. The state's process for verifying the validity of self-attestations is described in Question 28.

21. 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:

[EXAMPLE 1:] Provide documentation (as described in our response to Question 20) 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 WAP OR 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) [DEMONSTRATE 80% AMI <200% FPL IF USING TO QUALIFY FOR HIGHER REBATES.]
- ☐ Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) [DEMONSTRATE 80% AMI < 185% FPL IF USING TO QUALIFY FOR HIGHER REBATES.]
- ☐ Verified government or non-profit program serving Asset Limited Income Constrained Employed (ALICE) persons or households

OR

[EXAMPLE 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.]

22. Please confirm the following:

- Claimant will be required to note the number of individuals who occupy the dwelling unit.
- ☒ Yes, the state confirms the above statement.
- Claimant will be required to sign a statement or 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).
- ☒ Yes, the state confirms the above statement.
- 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 statement.

23. 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.

24. 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 all applications (100%) 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 IVES 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, and 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 reduce 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 believes 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.

25. 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.

[RESPONSE SHOULD CONFIRM THAT ALL TYPES OF HOUSEHOLDS IN THE PROGRAM WILL BE ADDRESSED WITH INCOME VERIFICATION. DESCRIBE HOW IT WILL NOT CREATE UNDUE BURDEN (E.G., ACCESSIBILITY AND EASE OF USE, EQUITY AND INCLUSION, COMMUNITY BENEFIT ORGANIZATION (CBO) ENGAGEMENT, CONTINUOUS MONITORING AND IMPROVEMENT) AND DESCRIBE SAFEGUARDS TO MINIMIZE ERROR AND ABUSE (E.G., CLAIMANT CANNOT CHANGE CALCULATIONS, ROBUST DATA VALIDATION, CLEAR GUIDELINES AND TRAINING FOR PROGRAM STAFF, A FAIR AND ACCESSIBLE APPEALS PROCESS, PENALTIES FOR MISREPRESENTATION OR FRAUD).]

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, reducing burden for claimants.

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.

26. Describe how the state will verify (confirm legitimacy of) income information for all claimants (e.g., verification within 2 days through the 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 the IRS, enrollment databases of approved programs, calls to employers as rebate claims come in, or other income verification services.

[DETERMINE IF THE STATE WILL ALLOW SELF-ATTESTATION IN ALL CASES OR FOR SELECT CIRCUMSTANCES (I.E., EMERGENCY REPLACEMENTS).]

For those applicants that apply with self-attestation (i.e., do not provide documentation), the vendor will begin by following up on verify attested information (through Income Verification Express Service (IVES) an income verification service and/or inquiries to the program(s) that the applicant stated enrollment in) for 100% of applicants that use self-attestation prior to approving the rebate application 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 [ENTER ONE OF THE FOLLOWING OPTIONS: 1) BEFORE APPROVING REBATE APPLICATION, 2) AFTER APPROVING REBATE APPLICATION, 3) AFTER APPROVING REBATE APPLICATION UNDER RELEVANT CONDITIONS (E.G., FOR APPLICANTS LIVING IN LOW-INCOME CENSUS TRACTS, FOR EMERGENCY REPLACEMENTS)].

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 **should IVES become accessible pending current IRS policy review.** 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 applicants can **access prior tax year returns or other acceptable documentation.** 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.

27. 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 cancelled 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; (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 aggregator** 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**.

28. 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.

[IF NOT N/A, STATES SHOULD PROVIDE INFORMATION ON:

- **DESCRIPTION OF HOW AND WHEN SELF-ATTESTATION WILL BE USED (E.G., WHICH PATHWAYS, CUSTOMER TYPES, PROJECTS, IN COMBINATION WITH OTHER OPTIONS)**
- **STATEMENTS, LANGUAGE, AND DETAILED INFORMATION REGARDING FOLLOW-UP STEPS THAT WILL BE USED FOR THIS PROCESS**
- **HOW CLAIMANT WILL BE WARNED OF LIABILITY ASSOCIATED WITH FALSIFYING INFORMATION (E.G., SIGNED PARTICIPATION AGREEMENT THAT INCLUDES INFORMATION ON FALSIFICATION RECOURSE)**
- **HOW SIGNED STATEMENTS OF SELF-ATTESTATION WILL BE SECURELY STORED.**

As stated previously, the state will require review of 100% of applications that use self-attestation prior to approving a rebate reservation request (i.e., issuing a rebate coupon).

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 not be approved 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.

29. 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.

[RESPONSE SHOULD INCLUDE:

- HOW INCOME ELIGIBILITY WILL BE VERIFIED BY STATE, INCLUDING WHAT SYSTEMS WILL BE USED FOR VERIFICATION.
- HOW STATE WILL CONFIRM CATEGORICAL ELIGIBILITY (WHERE APPLICABLE).]

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.

30. 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 WAP OR 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)

31. 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 Section 50121 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.]

32. 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.

33. 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, the 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

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

[RESPONSE SHOULD DETAIL THE PROCEDURES THAT WILL ENSURE RENTERS ARE NOT SUBJECT TO UNJUSTIFIED RENT INCREASES (E.G., HOW BUILDING OWNERS WILL BE NOTIFIED OF AND REQUIRED TO SIGN AGREEMENTS OF RENTER PROTECTIONS, HOW INCREASES TO RENT WILL BE COLLECTED AND MONITORED) AND THE PENALTIES THAT WILL PROVIDE DETERRENCE FOR OWNER VIOLATIONS (I.E., BY ESTABLISHING SOME MEASURE OF ECONOMIC OR REPUTATIONAL CONSEQUENCE). IF A STATE HAS NO LEGAL AUTHORITY TO RECLAIM REBATES OR PENALIZE THOSE WHO ARE FOUND IN VIOLATION OF THESE REQUIREMENTS, THE RESPONSE SHOULD INCLUDE OF A DESCRIPTION OF HOW THE STATE WILL ENSURE THE ENTITY IS BANNED FROM PARTICIPATING IN FUTURE PROJECTS AND WILL BE UNABLE TO CLAIM FUTURE REBATES.]

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], in addition to damages and attorney's fees recoverable by tenants.~~
- In the event the owner does not comply, the owner must refund the rebate and will be subject to penalties and enforcement commensurate to their actions:
 - A fine/penalty in addition to recovery of the rebated amount
 - Damages and attorney's fees recoverable by tenants

~~As a means of enforcement, the~~ 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.

35. 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 create a contractor network by actively recruiting contractors to join. To be included in the network, contractors will be required to submit information for pre-qualification, demonstrating their qualifications and capabilities. The state will also conduct targeted outreach to contractors in Justice40 (J40) communities, providing support through simplified application processes, technical assistance, and financial incentives to encourage their participation.

The state will provide contractors and aggregators location-specific data to determine if an address qualifies for the \$200 disadvantaged community incentive.

[IF USING THE DOE REBATE TRACKING SYSTEM:]

The state will be using the DOE Rebate Tracking and Reporting Tool and will [CHOOSE ONE OF THE FOLLOWING OPTIONS OR ADJUST FOR YOUR STATE:]

[OPTION 1:] Use the *Climate and Economic Justice Screening Tool* (CEJST) to identify disadvantaged communities (available here: Explore the map - Climate & Economic Justice Screening Tool (geoplatform.gov))

OR

[OPTION 2:] Provide a state-issued map of disadvantaged communities so that the DOE Rebate Tracking and Reporting Tool can associate a home's location with its "disadvantaged community" status.

When a rebate is reserved and a coupon is issued via the DOE tool, that unique coupon will state whether the contractor is eligible for the incentive based on the

location of the home. At the 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 or aggregator 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.

[IF NOT CONNECTED TO THE DOE REBATE TRACKING AND REPORTING TOOL:] The state will establish a payment system:

- 1) Partner with the state's finance department to set up a secure, efficient process for issuing payments to contractors and aggregators, such as direct deposit.
- 2) Create a rebate reserve system to hold funding for projects and process applications for said rebates with CEJST or other mapping support to verify if homes qualify.
- 3) Incorporate the list of eligible contractors and aggregators and provide them with training to interact with the [INSERT TOOL NAME] system.
- 4) Use the [INSERT TOOL NAME] system to pay contractors.
- 5) Execute payment to recipient contractors and aggregators when required project completion data has been provided to the state.
- 6) Manage the tracking of redemption of funds previously reserved after projects are completed.

Section 3.1.4: Community Benefits Plan

36. 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 CEJST), a state must explain how the proposed definition will meet the following three criteria as described in DOE J40 implementation guidance:⁴

- 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.

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.

- 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 J40:
 - 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
- 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.

[EXAMPLE 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

[EXAMPLE 2:] The state will issue a state-specific map of disadvantaged communities that will meet the requirements described in the [Program Requirements & Application Instructions](#). 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
- (1) 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

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

- ☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD DESCRIBE THE SYSTEMS TO BE PUT IN PLACE TO ALLOW EFFECTIVE PROCESSING OF REBATES. STATES SHOULD INCLUDE THE FOLLOWING INFORMATION IN THEIR RESPONSE:

- DESCRIPTION OF SYSTEMS USED TO PROCESS REBATES
- HOW THEY WILL ENSURE ABILITY TO APPLY REBATES AT POS AND/OR AS PART OF INVOICE
- HOW STATE WILL BE SENDING DATA TO DOE (E.G., DOE API OR OTHER APPROVED PROCESS)
- CLARITY ON DETAILS FOR REBATE ISSUANCE AND INVOICING]

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 rebates are issued within required timeframes (see Question 43 below) 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.

The state will issue a separate RFP for rebate processing if our selected implementation contractor does not meet our needs for carrying out this function.

Our implementer (and rebate processor if different) will be required to connect to the APIs provided by the DOE Rebate Tracking and Reporting Tool 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 using 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). The program-developed software will also allow for an API or flat file CSV option to ensure broad functionality with other systems.

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 rebate, how they can be applied, and how rebate processing works to reimburse contractors/aggregators for rebates applied at the time of sale.

38. 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.

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.

[RESPONSE SHOULD DESCRIBE:]

- HOW STATE WILL ENSURE PROCESSING TIME WITHIN REQUIRED DURATIONS (E.G., CONTRACT REQUIREMENTS AND KEY PERFORMANCE INDICATORS SUCH AS SYSTEM RELIABILITY, FUND UTILIZATION, CONTRACTOR/AGGREGATOR PAYMENT TIME, ESCALATION RESOLUTION TIME, AND CUSTOMER SATISFACTION).
 - o NOTE: FOR MEASURED - WITHIN 60 DAYS OF SUBMITTED INVOICE TO STATE; FOR MODELED - WITHIN 4 WEEKS OF RECEIPT OF ELIGIBLE REBATE APPLICATION.
- CORRECTIVE ACTION IN EVENT OF LENGTHIER TIMES (E.G., FINANCIAL PENALTIES).
- HOW THE NEED FOR CORRECTIVE ACTION WILL BE DETERMINED (E.G. IF A CERTAIN NUMBER OR PERCENTAGE OF REBATES ARE PROCESSED LATE, A THRESHOLD OF CUSTOMER COMPLAINTS ARE REACHED, THERE ARE SPECIFIC PERCENTAGES OF ERRORS).]

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

The state will require rebate processing to occur within [ENTER LENGTH OF TIME NO GREATER THAN 4 WEEKS] of receipt of required and acceptable information for projects.

This timeframe will include time associated with delivery of all applicable modes of rebate payment (i.e., a check in the mail or direct deposit).

The state will require the rebate processing entity to develop a method for obtaining real-time status updates on processing times [ENTER TIMEFRAME - FOR EXAMPLE, "ON A MONTHLY BASIS"].

To ensure accuracy of reporting, the rebate processing entity will be required to:

- Electronically stamp (date and time) applications upon submission.
- Display submission dates in all work queue views.
- Automate prompts when applications are at risk of falling behind the planned processing timeline.
- Define key indicators to confirm the process is working.

Should the processing times exceed those stipulated above, the state will require the processor to provide an explanation, develop a resolution plan, and if necessary, implement new methods or systems to speed up processing within 30 days of notification. If the processor fails to meet the milestones outlined in the resolution plan, the state will reserve the right to terminate the scope of work and engage another implementation company.

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.

39. 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.

☐ N/A. State is not planning to run 50122.

[CHOOSE ONE OF THE FOLLOWING:]

[OPTION 1:] The state will apply the DOE/PNNL provided workflows and connect to the DOE Rebate Tracking and Reporting Tool's API 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.]

40. 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 or a preferred more granular geography (e.g., census tract) 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.

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

☒ Yes, the state confirms the above statement.

[STATE CAN DESCRIBE HERE ADDITIONAL DETAILS OR SPECIFICS INCLUDING:]

- IF THE STATE WILL BE CONNECTED IN REAL-TIME TO THE DOE REBATE TRACKING AND REPORTING TOOL'S API TO SUPPORT RESERVATIONS AND REDEMPTIONS AND MEET REPORTING REQUIREMENTS.
- IF THE STATE WILL CONNECT TO THE DOE REBATE TRACKING AND REPORTING TOOL'S API TO PROVIDE MONTHLY REPORTING OF COMPLETED PROJECTS.
- IF THE STATE WILL USE THE DOE-PROVIDED SPREADSHEETS FOR REPORTING.]

Section 3.1.6: Data Collection and Evaluation

42. 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.

43. 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 three years after the state submits our final expenditure report to DOE. All of these requirements will extend to our program implementers and/or evaluators.

44. 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.
- NOTE THAT THE STATE MUST INCLUDE AN INDEPENDENT REVIEW OF PROGRAM'S PROCESSES AT LEAST EVERY THREE YEARS.]

[EXAMPLE 1:] Please refer to our Privacy and Security Plan for detailed documentation of the processes to monitor, identify, and address security and privacy threats.

[EXAMPLE 2:] The state has the following processes to monitor, identify, and address security and privacy threats. [INSERT LINK]

[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.

45. 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.

[RESPONSE SHOULD INCLUDE:

- IF THE STATE HAS EXISTING SYSTEMS THAT ACCESS HOUSEHOLD UTILITY BILLS (E.G., GREEN BUTTON)
- IF AND HOW THE STATE MAY PARTNER WITH UTILITIES TO REQUEST AND RECEIVE DATA (I.E., THE STATE WILL SUBMIT A LIST OF ADDRESSES TO THE UTILITY)
- IF AND HOW THE STATE WILL ENGAGE WITH HOUSEHOLDS TO COLLECT THE DATA DIRECTLY (I.E., IF REQUESTED, THE STATE WILL PROVIDE A LINK TO UPLOAD THEIR

DATA BILLING DATA, OR WILL PROVIDE INFORMATION ON HOW TO CONTACT THEIR UTILITY TO REQUEST THEIR UTILITY BILLS)]

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. Participating 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 it 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 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.

As utility-level interfaces may not consistently be available, [ENTER STATE NAME] will also establish the procedures and protocols to ensure that the program implementers (or aggregators) have a consistent and reliable means to access customer usage data and will establish data transfer plans that meet the data requirements for [ENTER STATE NAME]'s Advanced M&V and evaluation needs.

46. 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.

47. 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 (e.g., consumers, contractors, distributors, retailers, 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 Energy 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.

48. 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]

IF YES, RESPONSE INCLUDES A DESCRIPTION OF ALL OF THE FOLLOWING:

- EVALUATION OBJECTIVES. E.G.,
 - THE PROCESS EVALUATION GOALS ARE TO ASSESS AND UNDERSTAND THE PROGRAM EXPERIENCES FOR PARTICIPANTS (E.G., CONSUMERS, CONTRACTORS, DISTRIBUTORS, AND RETAILERS); IDENTIFY BARRIERS, COMPLEXITIES, INEFFICIENCIES; PROVIDE RECOMMENDATIONS TO IMPROVE THE PROGRAM EXPERIENCE; PROVIDE THE IMPACT EVALUATION GOALS ARE TO ASSESS IF THE PROGRAM IS DELIVERING THE RESULTS EXPECTED BY CONSUMERS AND STATES (E.G., CAPACITY, CUSTOMER BILL SAVINGS, AND GHG SAVINGS, NON-ENERGY BENEFITS); REVIEW TOOLS, MODELS AND METHODOLOGIES; AND PROVIDE RECOMMENDATIONS FOR PROGRAM IMPROVEMENTS.
 - THE MARKET EFFECTS EVALUATION GOALS ARE TO MEASURE THE LASTING CHANGES IN THE BEHAVIOR AND DECISION-MAKING OF CONSUMERS AND SUPPLIERS THAT RESULT FROM MARKET INTERVENTION.)
- HIGH LEVEL WORK PLAN

- STATES MAY PROVIDE INFORMATION ON THEIR WORK PLAN OR DEFER THIS TO THEIR EVALUATION PLAN.
- ANTICIPATED RESEARCH STRATEGIES (E.G., EVALUATION METHODS LIKE STATISTICAL OR ENGINEERING ANALYSES, ANTICIPATED SAMPLING APPROACHES, DOCUMENTATION REVIEW, INTERVIEW, SURVEYS)
- SIZE AND TIMING OF EVALUATIONS (E.G., FEWER, LARGER EVALUATION OR SMALLER EVALUATIONS INTENDED FOR FASTER FEEDBACK)
- TIMING (E.G., WITHIN ONE YEAR OF PROGRAM LAUNCH AND EVERY TWO YEARS THEREAFTER)
- WHETHER THE STATE WOULD REQUEST TO BE EXCLUDED FROM THE DOE-LED EVALUATIONS

FOR ADDITIONAL INFORMATION ON THE EVALUATION STRATEGIES AND WORKPLANS, SEE DOE PROGRAM RECOMMENDATIONS.]

The state will establish our final evaluation objectives as part of developing our evaluation plan and will be reported to DOE in the evaluation plan template. Expected objectives include but are not limited to (a) understanding program experience of different stakeholders to improve process; (b) quantifying impacts of energy savings, bill savings, GHG, and/or non-energy benefits and developing recommendations for increasing beneficial outcomes of each; and (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. The state plans to begin the first evaluation six months after program launch and complete it within one year. The state plans to begin evaluations every two years and complete each within one year.

The state does not request exclusion from DOE sponsored evaluations, but requests that DOE ensure that any participant in state-sponsored surveys, interviews or field visits is excluded from the DOE evaluation sample to ensure that our program's participants do not have a high response burden.

Consumer Experience

Section 3.2.1: Outreach and Education Strategy

49. Confirm that the state will develop and submit an outreach and education strategy consistent with Section 3.2.1 of the [Program Requirements & Application Instructions](#) document.
- ☒ 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

50. Describe the processes and procedures for conducting home assessments that meet program requirements.
- ☐ Defer response to State Implementation Blueprint.

[FOR SINGLE FAMILY HOMES, (MULTIFAMILY RESPONSE IS QUESTION 52) RESPONSE SHOULD DESCRIBE:

- PROCEDURES AND PROCESSES FOR CONDUCTING SINGLE FAMILY HOME ASSESSMENTS (E.G.:
 - PROVIDE QUALIFICATION REQUIREMENTS OF THOSE DOING THE ASSESSMENTS
 - DEFINE THE SCOPE OF THESE ASSESSMENTS
 - DESCRIBE DATA POINTS THAT WILL BE COLLECTED DURING THE AUDIT SUCH AS BUILDING CHARACTERISTICS AND EQUIPMENT DETAILS
 - DESCRIBE WHAT QUALITY ASSURANCE AND CONTROLS WILL BE PUT IN PLACE TO REVIEW DATA COMPLETENESS AND ACCURACY OF THE REPORTS AND MECHANISM FOR PROCESS IMPROVEMENT AND OVERSIGHT OF THE ASSESSOR POOL, INCLUDING CLEAR POLICY AROUND MISTAKES, ERRORS, OR NEGLIGENCE
 - PROVIDE METHODOLOGY FOR DETERMINING PRIORITIZED RECOMMENDATIONS FOR IMPROVEMENTS AND AUDIT FINDINGS, SUCH AS THE DOE PRIORITY LIST FOR SINGLE FAMILY HOMES⁶
- CONSIDER REFERENCING THE STANDARDS ANSI/BPI 1100-T-2023 AND ANSI/BPI 1200-S-2017
- IF YOUR STATE IS CONDUCTING BOTH MODELED AND MEASURED PATHWAYS, DESCRIBE ANY DIFFERENCES BETWEEN THE TWO.
- NOTE: REQUIRED DATA MUST BE COLLECTED CONSISTENT WITH BOTH THE LIST OF REQUIREMENTS IN SECTION 3.2.2: HOME ASSESSMENTS AND IN THE DATA & TOOLS

⁶ https://www.energy.gov/sites/default/files/2022-06/wpn-22-8_attachment-priority-list-single-family.pdf

REQUIREMENTS GUIDE. FURTHERMORE, ALL REQUIRED DOCUMENTATION MUST BE RETAINED, CONSISTENT WITH SECTION 3.2.2: HOME ASSESSMENTS]

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 conducted consistent with DOE's Data and Tools requirements. Detailed guidance for market partners 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 that meet state and DOE 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 all requirements contained in the latest versions of DOE guidance.

All assessments will feed data into modeling software approved by DOE.

Assessment tools will concurrently generate a Home Energy Score [OR OTHER HOME ASSESSMENT TOOL PROPOSED BY STATE] model and prioritized recommendations, as well as a Home Energy Score for integration into the project certificate. [THE HOME ENERGY SCORE TOOL IS A DOE-SUPPORTED ENERGY EFFICIENCY ASSESSMENT TOOL. BASED ON A STANDARD ASSESSMENT OF A HOME'S ENERGY-RELATED ASSETS, IT ESTIMATES HOME ENERGY USE, ASSOCIATED COSTS, AND PROVIDES ENERGY SOLUTIONS TO COST-EFFECTIVELY IMPROVE THE HOME'S EFFICIENCY.]

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.

To encourage best practices, contractors will be encouraged to take the online Home Energy Score training and pass the online test. Contractors will be encouraged to ensure that data collection is consistently measured and meets Home Energy Score requirements (e.g., derating of insulation based on installation, definition of square footage). Where feasible, the Home Energy Score will be integrated into the state certificate. Home Energy Scores on projects will allow the state and its evaluation contractors to easily compare energy savings estimates and improvement recommendations from the standardized Home Energy Score with

those of the contractor's model. Additionally, Home Energy Scores will be used for modeled exceptions projects (see Question 59).

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.

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

☐ Defer response to State Implementation Blueprint.

[RESPONSE SHOULD DESCRIBE HOW HOME ASSESSMENT DATA AND RESULTS WILL BE VERIFIED FOR ACCURACY. CONSIDER ADDRESSING:

- THE LEVEL OF FIELD QUALITY ASSURANCE (QA) RATES AND LEVEL OF DESK REVIEW RATES REQUIRED BY BOTH THE IMPLEMENTER AND THE STATE WITH PROCESSES TO FLAG INACCURACY AND SEND THEM BACK TO BE FIXED.
- TRAINING AND REVIEW OF INDIVIDUAL CONTRACTORS AND WHAT WILL BE DONE WHEN ISSUES ARE FOUND TO BE PERSISTENT WITH A CONTRACTOR.]

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

Our program's 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.

52. 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.

[FOR MULTIFAMILY HOMES, (SINGLE-FAMILY RESPONSE IS QUESTION 50) RESPONSE SHOULD DESCRIBE:

- PROCEDURES AND PROCESSES FOR CONDUCTING HOME ASSESSMENTS FOR MULTIFAMILY BUILDINGS INCLUDING COMMON SPACES (E.G., ASHRAE STANDARD 211-2018, ASHRAE LEVEL 2 AUDITS FOR MODELED AND MEASURED, QUALIFICATION REQUIREMENTS FOR ASSESSORS, QUALITY ASSURANCE AND CONTROLS TO REVIEW DATA COMPLETENESS AND ACCURACY, OVERSIGHT OF THE ASSESSOR POOL (MISTAKES, ERRORS, OR NEGLIGENCE), APPROACH FOR PRIORITIZED RECOMMENDATIONS FOR IMPROVEMENTS SUCH AS THE DOE LOW-RISE PRIORITY LIST⁷)
- IF YOUR STATE IS CONDUCTING BOTH MODELED AND MEASURED PATHWAYS, DESCRIBE ANY DIFFERENCES BETWEEN THE TWO.
- NOTE: REQUIRED DATA MUST BE COLLECTED CONSISTENT WITH BOTH THE LIST OF REQUIREMENTS IN SECTION 3.2.2: HOME ASSESSMENTS AND IN THE DATA & TOOLS

⁷ https://www.energy.gov/sites/default/files/2022-06/wpn-22-8_attachment-priority-list-low-rise-multifamily-projects.pdf

REQUIREMENTS GUIDE. ALL REQUIRED DOCUMENTATION WILL BE RETAINED, CONSISTENT WITH SECTION 3.2.2: HOME ASSESSMENTS.]

Modeled Approach: Multifamily

Contractors/Energy Auditors will be required to complete an ASHRAE Standard Level 2 audit using Audit Template or a standardized spreadsheet and run an energy model through software approved by DOE. The ASHRAE Level 2 audit data must be reported in BuildingSync or in a spreadsheet format.

Measured Savings: Multifamily

The assessment requirements will be similar to modeled savings projects, but the assessor will have the option to have 'don't know' or 'not applicable' inputs for data fields that are not being addressed. Contractors will be required to complete an ASHRAE Standard Level 2 audit. Data will be reported using BuildingSync or in a spreadsheet format.

The state will require standard use assumptions for common areas unless the modeler provides rationale for applying other assumptions.

In both measured and modeled, all data collected during assessment will be consistent with the requirements listed in Section 3.2.2: Home Assessments and the Data & Tools Guide. Likewise, the implementer will be required to retain all documentation per DOE requirements.

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

53. 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

54. 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

55. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1 of the [Program Requirements & Application Instructions](#) document.

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

[IF THE STATE IS PURSUING THE MODELED PROGRAM PATH, IDENTIFY THE FACTORS THE STATE WILL USE TO CALCULATE KWH EQUIVALENT.]

[OPTION 1:]

IF THE STATE IS PROPOSING TO USE ONLY **SITE** ENERGY SAVINGS IN ITS PROGRAM, INCLUDE SPECIFICS ON THE CONVERSION TO SITE KWH EQUIVALENT]:

The state will use site savings on a kWh equivalent basis for reporting to DOE and for the calculation of the rebate threshold. For homes that use non-electric energy sources the state will apply standard conversion factors, as noted in the following table, to calculate energy used in kWh:

Fuel	Measured Energy Unit	Conversion to Site kWh
Electricity	kWh	kWh = kWh
Natural Gas	therm	kWh = therm * 29.3
Propane	gallon	kWh = gallons * 26.8
Fuel Oil	gallon	kWh = gallons * 43.9
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]		

[OPTION 2:]

IF THE STATE IS PROPOSING TO USE **SOURCE** ENERGY SAVINGS AS ONE OF ITS METRICS, INCLUDE SPECIFICS ON THE CONVERSIONS TO SITE KWH EQUIVALENT, SOURCE KWH EQUIVALENT AND THE REFERENCE FOR SOURCE-SITE RATIOS]:

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>):

The state will use site savings on a kWh equivalent basis for reporting to DOE, consistent with the Data and Tools Requirements Guide. When the state uses energy source savings, the state will calculate kWh equivalent for all fuel types by

applying a source-site ratio. The state will apply standard conversion factors as noted in the following table to calculate the kWh equivalent based on the BPI-2400 equation 4.3.1.i as the reference and use the BPI-2400 recommended source-site ratio:

Fuel	Measured Energy Unit	Conversion to Site kWh	Source-Site Ratio (c)	Reference for Source Ratio
Electricity	kWh	kWh = kWh	NA	BPI-2400 equation 4.3.1.i
Natural Gas	BTU	kWh = BTU/3412	0.4	
Propane	BTU	kWh = BTU/3412	0.4	
Fuel Oil	BTU	kWh = BTU/3412	0.4	
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]				

Source kWh Equivalent will be calculated using Equation 4.3.1.i:

$$kWh_{equiv} = kWh_{elec} + c \left(\frac{Btu_{fossil}}{3412} \right)$$

Where the source-site ratio for all fossil fuels is $c = 0.4$

[OPTION 3:]

The state will use site savings on a kWh equivalent basis for reporting to DOE, consistent with the Data and Tools requirements. When the state uses source savings, the state will calculate the kWh equivalent for all fuel types by applying a source-site ratio. The state will apply standard conversion factors as noted in the following table to calculate kWh equivalent. The state will use EIA energy data to calculate Source-Site Ratios (SSRs), consistent with the methodology referenced by EPA (Source Energy Technical Reference (energy.gov)).

Fuel	Measured Energy Unit	Conversion to Site kWh	SSR	Reference for SSR
Electricity	kWh	kWh = kWh	2.8	EIA Monthly Energy Review, 2017, Tables 7.1, 7.2b, 7.3b.
Natural Gas	therm	kWh = therm * 29.3	1.05	
Propane	gallon	kWh = gallons * 26.8	1.01	

Fuel Oil	gallon	kWh = gallons * 43.9	1.01	
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]				
Source kWh equivalent will be calculated consistent with BPI Equation 4.3.1.i, while leveraging SSRs by fuel type per below:				
$kWh_{equiv} = (kWh \times SSR_{elec}) + (therms_{NG} \times 29.3 \times SSR_{NG}) + (gallons_{propane} \times 26.8 \times SSR_{propane}) + (gallons_{FO} \times 26.8 \times SSR_{FO})$				

56. Describe the energy savings objectives and overall approach for estimating energy savings for the modeled program path.

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

[IF IMPLEMENTING THE MODELED PATH, RESPONSE SHOULD DESCRIBE, FOR BOTH SINGLE FAMILY AND MULTIFAMILY:

- SAVINGS OBJECTIVES (E.G., SAVING REBATE THRESHOLDS, REDUCING BILLS FOR CUSTOMERS, ENCOURAGING ENVELOPE SAVINGS, AIR SEALING, ELECTRIFICATION WITH HIGH EFFICIENCY EQUIPMENT)
- APPROACH FOR ESTIMATING CALIBRATED ENERGY SAVINGS FOR THE MODELED PATH (E.G., SAVINGS METHODOLOGY WILL BE CONSISTENT WITH BPI-2400 FOR SINGLE FAMILY, REQUIREMENTS OR RECOMMENDATIONS FOR MODELING INPUTS AND ASSUMPTIONS, CONSIDER LIFECYCLE ANALYSIS FOR FUEL SWITCHING MEASURES)
- NOTE: QUESTION 58 RESPONSE INCLUDES THE PROPOSED ENERGY SAVINGS TOOLS STATE WILL USE
- NOTE: QUESTION 60 RESPONSE SHOULD INCLUDE INFORMATION ON PROPOSED APPROACHES FOR ESTIMATING ENERGY SAVINGS FOR EXCEPTIONS.]

Objectives:

- Maximize energy savings through targeting home characteristics and high energy.
- Prioritize envelope upgrades and air sealing.
- Replace natural gas through conversion to heat pumps.
- Educate consumers on how various upgrades impact energy savings and their energy bills.

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 in support of the objective to prioritize envelope measures, 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.

To ensure that consumers are aware of how various upgrades impact their home, contractors will be required to provide states with information on how different measures will affect utility bills. 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 they have a better idea of potential impacts.

The state's overall approach for estimating energy savings for the modeled program path is to have qualified assessors inspect participant homes and utilize BPI-2400 consistent software for single-family, as approved by DOE, to model the energy savings from the retrofit with bill calibration consistent with BPI-2400 processes. For single-family modeled exceptions (Section 3.2.4.1.1, see Question 60 response for more information), the state will utilize the Home Energy Score modeling approach.

[ENTER STATE NAME]'s overall approach for estimating energy savings for the modeled program path is to use BPI-2400-certified software for single-family, as approved by DOE, to model energy savings with bill calibration wherever possible, and Home Energy where bill calibration is not possible.

Multifamily will have a similar approach using ASHRAE Standard 140.2007 tested software and will use a tool listed on DOE's qualified software list per Option 1 in the Multifamily Guidance document.

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 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 [OR OTHER HOME ASSESSMENT TOOL PROPOSED BY STATE] (which already applies conservative assumptions regarding occupancy, occupant behavior, air leakage, etc.).

57. 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.

☐ Defer response to State Implementation Blueprint.

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

[RESPONSE SHOULD INCLUDE LIST OF UPGRADES THAT MAY BE INCLUDED IN MODELED SAVINGS ESTIMATE AND STATEMENT OF WHETHER THE STATE WILL REQUIRE THE INSTALLATION OF ENVELOPE MEASURES PRIOR TO OTHER UPGRADES.]

Our state will allow only inclusion of upgrades consistent with BPI-2400 for the purposes of modeling energy savings, including HVAC improvements, water heating and envelope improvements. 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, fenestration upgrades, and 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 pre-condition thresholds to inform contractors' recommendations for improvements.

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 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.

58. 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.

[RESPONSE SHOULD FOCUS ON SINGLE FAMILY; QUESTION 61 IS MULTIFAMILY FOCUSED. NOTE: IF STATE HAS NOT YET IDENTIFIED THE MODELING TOOLS IT WILL AUTHORIZE, THEN DEFER RESPONSE TO STATE'S IMPLEMENTATION BLUEPRINT. OTHERWISE, STATE MAY USE ONE OF THE EXAMPLES BELOW.]

[EXAMPLE 1:] For single-family projects, the state plans to use the following DOE-approved modeling tool(s) [FILL IN SOFTWARE NAMES].

OR

[EXAMPLE 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

[EXAMPLE 3:] The state has not yet confirmed what modeling tool(s) will be allowed. The state will provide a list to their assigned Project Officer no later than 60 days

prior to program launch, consistent with the deadline for the State Implementation Blueprint in order to obtain DOE review and approval.

59. 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.

[RESPONSE SHOULD DESCRIBE THE PROCESS FOR HOW THE RELIABILITY OF MODELS WILL BE MONITORED AND HOW AND WHEN CORRECTIVE ACTION WILL BE UNDERTAKEN. CONSIDER THE FOLLOWING ELEMENTS IN YOUR RESPONSE:

- HOW THE STATE WILL QC THE MODEL INPUTS (E.G., ENSURING THAT SITE-SPECIFIC CONSUMPTION, BASELINE AND MEASURE INFORMATION IS USED AND CONSISTENT WITH THE HOME ASSESSMENT)
- HOW THE STATE WILL REVIEW MODEL OUTPUTS FOR REASONABLENESS
- THE FREQUENCY OF MONITORING AND ORGANIZATIONAL RESPONSIBILITY
- THE CRITERIA THE STATE WILL USE TO DETERMINE MODEL RELIABILITY
- HOW THE STATE WILL TAKE CORRECTIVE ACTION IF THE ACTUAL SAVINGS RESULTS ARE LESS THAN 70% OF ESTIMATED SAVINGS]

As noted in response to Question 50, the State will require contractors to use DOE-approved modeling tools.

To monitor the reliability of models:

- The state will conduct QC checks on a random sample of projects as they are completed. Our program implementer will review the data inputs, modeling procedures, results, and recommendations to the homeowner. This oversight will conduct independent assessment of home characteristics if needed and identify areas of improvement and provide that feedback to contractors as needed.
- 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.
- For modeled projects, as part of the quality control sampling process, the implementer will update models based on actual home or project characteristics if they are different from the original inputs as reported by the contractor. The implementer will keep track of the ratio of the actual project modeled savings versus the original estimate of modeled savings based on the sample. If savings results for the actual modeled projects are less than 70% of estimated project savings, then the program will take corrective

action. This may include additional training for contractors, additional program rules or additional quality control efforts with individual contractors.

- 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.

As part of the state's impact evaluation, the state will select a sample of projects to compare contractors' energy models with results from running the modeling inputs through the standardized Home Energy Scoring Tool. Additionally, the state will randomly select homes (single-family and multifamily) that have received improvements and assess how their measured (i.e., statistical consumption analysis) savings compare with the predicted savings (whether through modeled or measured).

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, this point of comparison will help identify if contractors' scopes of work omit improvements that would likely be beneficial.

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;

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.

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 state EM&V models or predictions provided by DOE) 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/PNNE 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.

60. 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.
- Committing to carrying out evaluations upon thresholds listed in Section 3.2.3.1 of the [Program Requirements & Application Instructions](#) document.
- Describing 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.

[IF IMPLEMENTING THE MODELED PATH WITH EXCEPTIONS FOR SINGLE FAMILY, RESPONSE SHOULD DESCRIBE:

- WHICH EXCEPTIONS THE STATE PLANS TO APPLY THE ALTERNATIVE APPROACH (E.G., LACK OF DELIVERED FUEL BILLS, COOLING LOAD CANNOT BE ACCURATELY ACCOUNTED FOR IN BPI-2400, HOME WITH ENERGY USAGE DATA OF EXISTING OCCUPANTS LESS THAN ONE YEAR, ETC.).

- DETAILED DESCRIPTION OF THE METHOD(S) THAT THE STATE WILL USE TO ESTIMATE ENERGY SAVINGS FOR EACH EXCEPTION (E.G., TOOL OR METHOD THAT WILL BE USED FOR ESTIMATION OF ENERGY SAVINGS). IF STATES ARE USING AN UNCALIBRATED MODEL CONSISTENT WITH BPI-2400 ANNEX E, STATES ONLY NEED TO IDENTIFY THAT THEY ARE USING AN APPROVED TOOL, PROVIDE THE TOOL NAME AND DO NOT NEED TO INCLUDE INFORMATION REQUESTED IN THE NEXT BULLET.
- IF STATES ARE USING AN ALTERNATIVE METHOD (I.E., ONE NOT CONSISTENT WITH BPI-2400 ANNEX E), THEN DESCRIBE:
 - RELEVANT INFORMATION ON THE RELIABILITY OF THE SAVINGS ESTIMATION METHODS SUCH AS EVALUATION RESULTS).
 - HOW THE STATE WILL ENSURE CONSISTENCY BETWEEN THE ALTERNATIVE METHOD AND THE RESULTS OF BPI-2400 (E.G., USE OF A REALIZATION RATE ON ALL PROJECTS, HOW REALIZATION RATE WAS ESTABLISHED).
 - A COMMITMENT TO CARRYING OUT EVALUATIONS UPON THRESHOLDS LISTED IN SECTION 3.2.3.1.
 - DESCRIPTION OF HOW THE STATE WILL USE ANY EVALUATION RESULTS OR NEW INFORMATION TO UPDATE AND ADJUST ITS ALTERNATE SAVINGS MODELING METHOD. (E.G., AFTER COMPLETION OF THE EVALUATION, REALIZATION RATE WILL BE UPDATED ON FORWARD-LOOKING BASIS FOR SAVINGS REPORTING AND ADJUSTMENTS TO THE MODELING OR DATA COLLECTION PROCEDURES MAY BE IMPLEMENTED)

IF IMPLEMENTING THE MODELED PATH FOR MULTIFAMILY, RESPONSE SHOULD DESCRIBE:

- DETAILED DESCRIPTION OF THE METHOD(S) THAT THE STATE WILL USE TO ESTIMATE ENERGY SAVINGS FOR MULTIFAMILY (E.G., TOOL OR METHOD THAT WILL BE USED FOR ESTIMATION OF ENERGY SAVINGS). IF STATES ARE USING APPROVED METHODS CONSISTENT WITH THE MULTIFAMILY GUIDANCE (HERE), STATES ONLY NEED TO IDENTIFY THAT THEY ARE USING AN APPROVED TOOL, PROVIDE THE TOOL NAME AND DO NOT NEED TO INCLUDE INFORMATION REQUESTED IN THE NEXT BULLET.
- IF STATES ARE USING AN UNAPPROVED, ALTERNATIVE METHOD (I.E., UNAPPROVED OPTION 3 IN THE MULTIFAMILY GUIDANCE) THEN STATES SHOULD DESCRIBE THE FOLLOWING:
 - RELEVANT INFORMATION ON THE RELIABILITY OF THE SAVINGS ESTIMATION METHODS SUCH AS EVALUATION RESULTS.
 - A COMMITMENT TO CARRYING OUT EVALUATIONS UPON THRESHOLDS LISTED IN SECTION 3.2.3.1.
 - DESCRIPTION OF HOW THE STATE WILL USE ANY EVALUATION RESULTS OR NEW INFORMATION TO UPDATE AND ADJUST ITS ALTERNATE SAVINGS MODELING METHOD. (E.G., AFTER COMPLETION OF THE EVALUATION, REALIZATION RATE WILL BE UPDATED ON FORWARD-LOOKING BASIS FOR SAVINGS REPORTING AND

ADJUSTMENTS TO THE MODELING OR DATA COLLECTION PROCEDURES MAY BE IMPLEMENTED))

There are a few instances in which our program will not require calibration, including the following types of circumstances:

- Homes with delivered fuels and the renter/homeowner attests they cannot locate recent bills.
- Where occupants have lived in the home less than one year.
- Instances where addition of cooling load cannot be accurately accounted for in BPI-2400.
- Multifamily.

[EXAMPLE 1:] For single family home exceptions (where calibration is not required), the state will require the contractor to use the Home Energy Scoring Tool. Because this tool is consistent with BPI-2400 Annex E, the state will not use a realization rate or conduct additional evaluation.

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 recommended improvements 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.

[EXAMPLE 2:] For single family home exceptions, the state will use [DESCRIBE METHOD AND TOOL]. Due to lack of relevant, evaluated results of this method, the state will use a realization rate of 90% for calculation of savings thresholds and all reporting to DOE. This value will be updated on a prospective (forward-looking) basis after the completion of the evaluation described below.

For these exceptions, the state commits to conducting evaluations based upon the thresholds listed in Section 3.2.4.1. 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 years thereafter.

The evaluation will calculate a realization rate as the ratio of the program savings and evaluated savings. Following the evaluation, the state will update prospective

realization rates for use in rebate calculation and reporting to DOE. Additionally, our implementers will adjust program processes 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.

[EXAMPLE 3:] For multifamily, the state will use [DESCRIBE METHOD AND TOOL], which is listed in the Approved Multifamily Tools list provided by DOE; additional information is provided in Question 61.

[EXAMPLE 4:] For multifamily homes exceptions, the state will use [DESCRIBE METHOD AND TOOL], which is described in detail in Question 61. Due to the fact that this tool has been used successfully for years in our state, the state will use a realization rate of 90% for calculation of savings thresholds and all reporting to DOE. This value will be updated on a prospective (forward-looking) basis after the completion of the evaluation described below.

For multifamily, the state commits to conducting evaluations based upon the thresholds listed in Section 3.2.4.1. 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 years thereafter.

The evaluation will calculate a realization rate as the ratio of the program savings and evaluated savings. Following the evaluation, the state will update prospective realization rates for use in rebate calculation and reporting to DOE. Additionally, our implementers will adjust program processes based upon the evaluator's findings to ensure the any non-calibrated energy savings estimates are at least as reliable as those including calibration.

61. 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.

[IF IMPLEMENTING THE MODELED PATH, RESPONSE SHOULD CONSIDER DESCRIBING:]

- TOOLS USED FOR MODELING MULTIFAMILY PROJECT SAVINGS
- PROCESSES FOR MODELING MULTIFAMILY PROJECT SAVINGS (E.G., HOW ASSESSMENT DATA WILL BE COLLECTED, MEASURES THAT WILL BE ALLOWED TO BE MODELED,

REVIEW OF ENERGY MODELING METHODS IF APPROVED TOOLS ARE NOT USED, APPROACH TO COMMON AREAS)

- ANY UNIQUE REQUIREMENTS OR PROCESSES FOR MULTIFAMILY PROJECTS
- NOTE: STATE MAY INDICATE WHERE QUESTIONS 58-60 RESPONSES PROVIDE THESE DETAILS.]

[EXAMPLE 1:] The state will utilize the home assessment data collected while performing ASHRAE Level 2 audits using Audit Template created by DOE's Building Technologies Office and generate energy models using software [ENTER TOOL NAME]. The energy models will include energy used in dwelling units and common areas that serve the residential building. The modeling software used has been tested to ASHRAE standard 140-2007 and is included in DOE's approved list of software.

Pre- and post-diagnostics, and engineering review, will be required as needed depending on the improvement measures that will be implemented.

[EXAMPLE 2:] As described in Question 59, state is planning to use [ENTER TOOL NAME], which is not approved by DOE. The state will use the following processes for modeling multifamily project savings [DESCRIBE PROCESSES].

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

62. 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.

[IF IMPLEMENTING THE MEASURED PATH, RESPONSE SHOULD DESCRIBE:

- SAVINGS OBJECTIVES (E.G., SAVINGS THRESHOLDS, REDUCING BILLS FOR CUSTOMERS, ENCOURAGING ENVELOPE SAVINGS, ELECTRIFICATION, FOCUS ON PEAK REDUCTIONS, GRID BENEFITS, ETC.)
- OVERALL APPROACH FOR ESTIMATING ENERGY SAVINGS FOR THE MEASURED PATH (E.G., USE OF CONTRACTORS/AGGREGATORS, USE OF HOME ASSESSMENTS TO ESTIMATE SAVINGS AND FOR DATA COLLECTION).
- APPROACH TO DIFFERENT HOME TYPES AND HOMES WITH MULTIPLE FUELS

- STATE SHOULD ALSO INCLUDE ANY PROPOSALS FOR IMPLEMENTING THE MEASURED PATH THAT DOE WOULD NEED TO BE AWARE OF (E.G. THE PROGRAM WILL NOT INCLUDE RENTERS DUE TO INCREASED CHANCE OF OCCUPANCY TURNOVER DURING THE MEASUREMENT PERIOD)
- NOTE: QUESTION 64 RESPONSE INCLUDES THE PROPOSED ENERGY SAVINGS TOOLS STATE WILL USE.]

The state's primary energy savings objectives are:

- Maximizing energy savings through targeting home characteristics and high energy bills.
- Prioritizing envelope upgrades.
- Replacing natural gas through conversion to heat pumps.

The state will implement the measured program using a program administrator that will act as the aggregator. That is, the implementer (aggregator) will be responsible for managing the suite of projects and reporting those projects within a portfolio that meets the 15% savings threshold.

Implementers and/or aggregators will be required to collect home assessment data as outlined in the Data and Tools Guidance and provide an estimate of energy savings to the household using the [ENTER TOOL NAME].

For measuring and reporting savings, the state will use the M&V methodology described in Question 64. When reporting a portfolio of savings, the state will review each project within the portfolio to understand the range of savings, costs and rebates. The state may choose to adjust the program objectives or household eligibility requirements if a type of household or characteristics of a project are continuously underperforming compared to savings estimates. The state will engage with the aggregator on a regular basis to monitor and review portfolios (more details provided in Question 65).

Question 67 provides more details for measurement of multifamily buildings.

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

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 programs⁸ (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).

⁸ For measured savings projects, project "completion" refers to the point at which the contractor/aggregator submits usage data and applies for the rebate reimbursement.

63. Identify what factors the state will use to calculate kWh equivalent, consistent with Section 3.2.4.1 of the [Program Requirements & Application Instructions](#) document.

☐ Defer response to State Implementation Blueprint.

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

[IF THE STATE IS PURSUING THE MEASURED PROGRAM PATH, IDENTIFY THE FACTORS THE STATE WILL USE TO CALCULATE KWH EQUIVALENT.]

[OPTION 1:

IF THE STATE IS PROPOSING TO USE ONLY **SITE** ENERGY SAVINGS IN ITS PROGRAM, INCLUDE SPECIFICS ON THE CONVERSION TO SITE KWH EQUIVALENT]:

The state will use site savings on a kWh equivalent basis for reporting to DOE and for the calculation of the rebate threshold. For homes that use non-electric energy sources the state will apply standard conversion factors as noted in the following table to calculate energy used in kWh:

Fuel	Measured Energy Unit	Conversion to Site kWh
Electricity	kWh	kWh = kWh
Natural Gas	therm	kWh = therm * 29.3
Propane	gallon	kWh = gallons * 26.8
Fuel Oil	gallon	kWh = gallons * 43.9
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]		

[OPTION 2:

IF THE STATE IS PROPOSING TO USE **SOURCE** ENERGY SAVINGS AS ONE OF ITS METRICS, INCLUDE SPECIFICS ON THE CONVERSIONS TO SITE KWH EQUIVALENT, SOURCE KWH EQUIVALENT AND THE REFERENCE FOR SOURCE-SITE RATIOS]:

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>):

The state will use site savings on a kWh equivalent basis for reporting to DOE, consistent with the Data and Tools Requirements Guide. When the state uses energy source savings, the state will calculate kWh equivalent for all fuel types by applying an SSR. The state will apply standard conversion factors as noted in the following table to calculate kWh-equivalent based on the BPI-2400 equation 4.3.1.i as the reference and use the BPI-2400 recommended SSR:

Fuel	Measured Energy Unit	Conversion to Site kWh	Source-Site Ratio c	Reference for Source Ratio
Electricity	kWh	kWh = kWh	NA	BPI-2400 equation 4.3.1.i
Natural Gas	BTU	kWh = BTU/3412	.4	
Propane	BTU	kWh = BTU/3412	.4	
Fuel Oil	BTU	kWh = BTU/3412	.4	
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]				

Source kWh Equivalent will be calculated using Equation 4.3.1.i:

$$kWh_{equiv} = kWh_{elec} + c \left(\frac{Btu_{fossil}}{3412} \right)$$

Where the source-site ratio for all fossil fuels is $c = 0.4$

[OPTION 3:]

The state will use site savings on a kWh equivalent basis for reporting to DOE, consistent with the Data and Tools requirements. When the state uses source savings, the state will calculate kWh equivalent for all fuel types by applying a source-site ratio. The state will apply standard conversion factors as noted in the following table to calculate kWh equivalent. The state will use EIA energy data to calculate SSRs, consistent with the methodology referenced by EPA (Source Energy Technical Reference (energy.gov)).

Fuel	Measured Energy Unit	Conversion to Site kWh	Source-Site Ratio (SSR)	Reference for Site to Source Ratio
Electricity	kWh	kWh = kWh	2.8	EIA Monthly Energy Review, 2017, Tables 7.1, 7.2b, 7.3b.
Natural Gas	therm	kWh = therm * 29.3	1.05	
Propane	gallon	kWh = gallons * 26.8	1.01	
Fuel Oil	gallon	kWh = gallons * 43.9	1.01	
[STATES SHOULD ADD ROWS FOR OTHER RELEVANT FUELS]				

Source kWh equivalent will be calculated consistent with BPI Equation 4.3.1.i, while leveraging SSRs by fuel type per below:

$$kWh_{equiv} = (kWh \times SSR_{elec}) + (therms_{NG} \times 29.3 \times SSR_{NG}) + (gallons_{propane} \times 26.8 \times SSR_{propane}) + (gallons_{FO} \times 26.8 \times SSR_{FO})$$

64. 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.

[IF THE STATE IS PURSUING THE MEASURED PROGRAM PATH, CONSIDER INCLUDING:

- KEY REQUIREMENTS OR RECOMMENDATIONS FOR MODELING INPUTS AND ASSUMPTIONS, BASELINE DATA REQUIREMENTS
- POST UPGRADE DATA REQUIREMENTS, DATA NORMALIZATION REQUIREMENTS (OCCUPANCY, WEATHER, ETC.), STATISTICAL ANALYSIS FOR CONFIDENCE LEVEL VERIFICATION, AUTOMATION AND ONGOING REVIEW OF DATA COLLECTION PROCESSES TO ENSURE ACCURACY:]

[EXAMPLE 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. Because it is DOE-approved, the state confirms it meets the program requirements.

[EXAMPLE 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. The software can 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, as well as the source code used to conduct the analysis.

65. 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.

[RESPONSE SHOULD INCLUDE THE PROCESSES AND METHODS THE STATE WILL USE TO MONITOR ENERGY SAVINGS RELIABILITY IN MEASURED PROGRAM PATH AND WHAT THRESHOLD THE STATE WILL USE TO TRIGGER CORRECTIVE ACTION.]

The total savings of the portfolio will be calculated consistent with the Measured Payment Path Calculation Tool provided by DOE.

As described in Question 64, the software and aggregator must provide raw and normalized pre- and post- energy usage data and calculate and report out realized (measured) energy savings using standardized methods, as well as the source code used to conduct the analysis.

To ensure that measured savings calculations are meeting program requirements [E.G., ESTIMATES SAVINGS BASED ON DATA COLLECTED AT THE HOME, CALCULATES SAVINGS BASED ON NO LESS THAN NINE MONTHS OF BILLING DATA, AND OTHER REQUIREMENTS LISTED IN SECTION 3.2.4.2], the state will conduct its own independent analysis of the metered energy consumption data submitted and compare with the rebates submitted to ensure that the contractor/aggregator is correctly applying the advanced M&V software and correctly measuring energy savings for the portfolio. This will occur within a year of launching the measured savings program and no less than every two years thereafter.

In addition to portfolio-level checks, the state will select a statistically significant number of homes to conduct a quality control check of the project, including the home assessment data and modeling results of the home. Within a portfolio, the state will also conduct an analysis of the home-level results to identify trends, potential issues and compare the measured savings to the predicted savings at the time of installation.

To ensure that measured savings calculations are meeting program requirements, 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 assess the 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 rebates 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 14a 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)].

66. 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 one year or the state is not using the measured savings approach.

[IF ALLOWING LESS THAN 12 MONTHS, RESPONSE SHOULD INCLUDE:

- TIMING OF PEAK SEASON(S) IN STATE THAT MUST BE INCLUDED IN CONSUMPTION ANALYSIS IN ORDER TO ACCURATELY ESTIMATE HEATING AND COOLING SAVINGS FROM PROJECTS (E.G., WINTER-PEAKING, SUMMER-PEAKING OR DUAL SUMMER AND WINTER PEAKING.
- NOTE: THE PROGRAM REQUIRES NO LESS THAN 9 MONTHS AFTER THE FINAL INSTALLATION IN THE HOME OR PORTFOLIO.
- APPROACH TO ENSURING PEAK SEASONS WILL BE INCLUDED IN ANALYSIS (E.G., ONLY PROJECTS WITH AT LEAST 9 MONTHS OF DATA THAT INCLUDES THE PEAK SEASONS WILL BE USED IN THE POPULATION FOR SAVINGS ESTIMATION).]

The state will require analysis/comparison the collection of 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. The state is proposing to measure savings of households with 9 months of energy usage if the household meets the following conditions:

- A full summer peaking season is included (June-September). The state is a summer peaking state.
- All nine months of data are of a quality that can be used in the M&V, with little missing data, to not risk the confidence in the measurement.

67. 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.

[RESPONSE SHOULD INCLUDE PROCESS FOR MEASURING SAVINGS FOR MULTIFAMILY BUILDINGS AND DESCRIPTION OF WHICH FUELS WILL BE COLLECTED AND HOW THEY WILL BE COLLECTED FOR INDIVIDUAL UNITS, IF APPLICABLE.]

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 has experience with multifamily retrofit programs to ensure expertise in these complex projects.

As with single family homes To estimate savings, 12 months of whole-building utility usage aggregate data prior to retrofit will need to be compared to 12 months of whole-building utility usage aggregate data post-retrofit. [ALTERNATIVELY, IF USING LESS THAN 12 MONTHS, DEFINE PEAK SEASONS AND HOW THE STATE WILL ENSURE THEY ARE INCLUDED IN DATA, 9-MONTH MINIMUM.] In instances where whole building aggregate data cannot be obtained, sampling of individual units for non-master metered fuels will follow IPMVP or RESNET sampling protocols.

The state will require providers to use an approved open-source M&V software that is able to measure savings for a multifamily building consistent with the Multifamily guidance.

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

68. Certify that the state will prepare and implement a Consumer Protection Plan in accordance with the requirements (Section 3.2.5 of the [Program Requirements & Application Instructions](#) document) 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

69. 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.

[DESCRIBE HOW THE POST-INSTALLATION CERTIFICATE REQUIREMENT WILL BE MET, INCLUDING THAT IT:

- IS COMPLETED BY A THIRD PARTY
- IS PROVIDED TO THE HOUSEHOLD
- DETAILS THE WORK PERFORMED, EQUIPMENT AND MATERIALS INSTALLED, AND PROJECTED ENERGY SAVINGS TO SUPPORT ACCURATE VALUATION OF THE UPGRADE.

FOR STATES INTERESTED IN INCLUDING DOE LOGOS OR SEALS IN THE CERTIFICATE: [DOE LOGO, SEAL AND WORD MARK | DEPARTMENT OF ENERGY](#)

The state will engage one or more qualified third-party Certification Providers to issue each post-installation project certification.

The certification report will explain the benefits of the home features in language that the homeowner and potential buyers can understand, and that optimize use of the certification by real estate professionals and appraisers during the home sale process. The state will implement regular audits and oversight of third-party Certification Providers to ensure adherence to the established guidelines, maintaining the integrity of the certification process.

The state will identify a certification that meets the HOMES program requirements that 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
- Estimated annual energy use and costs generated as provided to household during the home assessment, updated based on final project scope.

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 (i.e., provided directly to the homeowner either in person or by the DOE Home Energy Scoring Tool

A email). It will also describe the minimum qualifications of certifiers. Where available, a Home Energy Score Report documenting the home's energy-related assets will be provided to the homeowner along with the certificate.

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 the party(ies) chosen by our state to issue certifications 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), that are not

the contractor performing the work, to certify the project and issue the certification 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.

70. 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.

[DESCRIBE HOW THE POST-INSTALLATION CERTIFICATE REQUIREMENT WILL BE MET INCLUDING THAT IT:

- IS COMPLETED BY A THIRD PARTY
- IS POSTED IN A COMMON AREA OR PROVIDED TO RESIDENTS IN SOME FASHION
- DETAILS THE WORK PERFORMED INCLUDING DETAILS OF INSTALLED EQUIPMENT AND MATERIALS INSTALLED, AND PROJECTED ENERGY SAVINGS TO SUPPORT ACCURATE VALUATION OF THE UPGRADE.]

The state's certification requirements for multifamily are the same as single family, with the following key difference: to inform households within a multifamily building, the owner will be required to post (for no less than 6 months) the certification in a public place within the multifamily building (e.g., entry, regularly used common space).

As with single family projects, our certification for multifamily buildings will meet the HOMES program requirements and 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).

A Home Energy Score (if available for the building type) or an ENERGY STAR Portfolio Manager score (when post-retrofit usage data is available) should either be incorporated into the certificate or simply attached to the certificate (depending on the certification design).

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 the party(ies) chosen by our state to issue certifications is not the contractor and is not compensated based on savings results, they meet the requirements for a 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 certification 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.

71. 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.

The state program will allow the following third-party certificates to be provided to homeowners that receive a rebate:

- [IDENTIFY WHICH THIRD PARTY CERTIFICATION PROGRAMS THE STATE WILL QUALIFY TO ISSUE CERTIFICATES TO HOMEOWNERS.]

[IF THE STATE IS USING THE HOME ENERGY SCORING TOOL TO PROVIDE THE CERTIFICATE] The state will use the Home Energy Score Tool to provide a certificate to households.

Consistent with our earlier response, the certificate will include estimated annual energy use and costs generated by the DOE Home Energy Scoring Tool, thereby ensuring consistently derived metrics across all projects. The state believes that this standardized information will hold significant 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

72. 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 Market Transformation Plan within the first year after receiving the financial assistance award.

Section 3.3.2: Integrating with Other Programs

73. 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 CONSIDER INCLUDING THE FOLLOWING:

- SPECIFIC PROGRAMS THAT WILL BE INTEGRATED WITH THE HOME ENERGY REBATES
- HOW REBATES WILL BE MANAGED ACROSS THE PROGRAMS
- HOW THE STATE WILL ADDRESS QUALIFICATIONS AND REQUIREMENTS THAT DO NOT EXACTLY ALIGN WITH THE HOME REBATES PROGRAM
- WHAT INFORMATION AND TRAININGS ARE PROVIDED TO CONTRACTORS THAT WILL BE NAVIGATING BOTH PROGRAMS
- 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 the rebates, the state plans to leverage the federally funded weatherization programs and use the Home Efficiency Rebates to deliver expanded whole-home energy efficiency services to ensure that low-income households in our state served by weatherization can also benefit from equipment improvements that are typically beyond the scope of weatherization.
- As one method for delivering these rebates, the state plans to leverage the existing utility programs. These non-federally funded programs already have consumer education and marketing materials, a qualified contractor network, and contractor training resources for delivering whole home retrofits and are therefore well suited to deliver the Home Efficiency Rebates as well. The state will engage with utilities to explore co-marketing opportunities, align workforce standards and qualifications for contractor enrollment, and when higher than ENERGY STAR, align equipment standards and minimum efficiency rebates as well.

By integrating the 50121 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.

74. 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.

[CONSIDER IDENTIFYING WHICH OTHER PROGRAMS STAKEHOLDERS MAY LEVERAGE IN THE STATE. DESCRIBE WHAT MARKETING AND TRAINING THE PROGRAM WILL DO FOR EACH STAKEHOLDER GROUP TO ENSURE AWARENESS OF OTHER PROGRAMS' RESOURCES.]

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 [ENTER NAMES OF UTILITIES] 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).

75. 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.

[CONSIDER INCLUDING IN THIS RESPONSE:]

- HOW THE STATE PROGRAM WILL ENSURE THAT THE CONSUMER PROVIDES THE AMOUNT OF REBATES ALREADY RECEIVED THROUGH OTHER PROGRAMS (ESPECIALLY IF NOT USING DOE'S REBATE TRACKING TOOL)
- IF/HOW THE STATE WILL COORDINATE WITH EXISTING PROGRAMS THAT OFFER REBATES FOR THE SAME PRODUCTS
- IF/HOW THE STATE WILL PROVIDE REBATE INFORMATION TO EXISTING PROGRAMS IF A STATE REBATE IS PROVIDED FIRST
- WHAT THE STATE WILL DO IF A REBATE PROVIDED EXCEEDS THE TOTAL PROJECT COST

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 or building owner 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 or building owner.

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

Finally, the state will require contractors to list all applied incentives that have been received on the invoice that must be sent to the state/implementer in order to receive reimbursement for the Home Efficiency Rebate-50121 Program applied at point of installation/service.

76. 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.

[CONSIDER HOW PROGRAM WILL TRAIN PROGRAM PARTNERS ON INFORMATION SYSTEMS AND DATA REQUIREMENTS.]

All contractors will be required to complete a brief online 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. Contractors will be instructed that if they submit insufficient information, they will not be reimbursed for rebates applied at the point of installation.

Participating retailers that wish to connect to the DOE Rebate Tracking and Reporting Tool’s API for validating coupons issued by the Tool and marking them for redemption will be instructed to register with DOE/PNNL to confirm access to the API and will be provided guidance on how to use that system to request reservation confirmation and submit redemption information electronically. Other retailers that are not connected and choose to accept a coupon will be directed to a state or implementer provided retailer user interface provided on the coupon. There, they will sign up to become a participating retailer and follow instructions on how to validate a coupon and submit all required information for reimbursements of applied rebates. If they do not submit all required information including a copy of the receipt with rebated amount, they will not receive reimbursement from the state.

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 and Reporting Tool 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 records will be retained by the state or implementer, and the majority of this information will also be provided to DOE in accordance with the Data and Tools Requirements guide.

77. 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.

[CONSIDER DESCRIBING THE PROCESSES AND SYSTEMS THE STATE WILL USE TO GENERATE, STORE, AND RETRIEVE INVOICES WHETHER USING THE DOE REBATE TRACKING SYSTEM OR ALTERNATIVE SYSTEM. CONSIDER WHO WILL BE RESPONSIBLE FOR THESE PROCEDURES.]

The state- or implementer-provided 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 and Reporting Tool 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.

[ALTERNATIVELY, IF THE STATE IS NOT USING THE DOE REBATE TRACKING AND REPORTING TOOL API:]

The state will require the implementer to establish protocols for producing invoice documentation within [ENTER NUMBER: X] days of request from DOE, the DOE's Inspector General, a state's inspector general, or another entity. All invoices will be stored in a secure database.

78. 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.

[CONSIDER REQUIRING THAT THE PROPOSED SCOPE OF WORK AND INVOICE CLEARLY SHOW THE AMOUNT OF THE HOME EFFICIENCY REBATE ON THE INVOICE.]

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. The state will require that aggregators and contractors that provide project scopes and/or invoices to household recipients clearly itemize the rebate amount and/or the percentage covered by the federal program, along with language that shows the rebates are from the "DOE Home Efficiency Rebates."

Without this documentation, contractors will not be reimbursed.

Section 3.3.3: Quick Starts

79. Identify whether the application is for a Quick Start program. For Quick Start programs, identify the timeline for program launch.

☐ 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.⁹ See Section 3.1.3 of the Program Requirements for details.

⁹ 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.¹⁰ See Section 3.1.3 of the Program Requirements for details.

¹⁰ 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-family and multifamily 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.