

Request for Information To Support Program Design for the Inflation Reduction Act's Home Efficiency Rebates (Sec. 50121) and Home Electrification and Appliance Rebates (Sec. 50122) Programs

Responses due by Friday, February 23rd at 5:00 pm

Purpose

The Office of Energy Resources (OER) is considering options for the design and implementation of the Home Efficiency Rebates (HER) program and the Home Electrification and Appliance Rebates (HEAR) program, collectively known as the Home Energy Rebate programs. Through this Request for Information (RFI) OER is seeking information on what program design options will most effectively serve Rhode Island households with technology, products, and services that will reduce energy bills, increase home comfort, improve indoor air quality, and reduce carbon emissions.

Scope

On August 16, 2022, President Biden signed the Inflation Reduction Act (IRA) into law. The law included \$391 billion to support clean energy and address climate change, including \$8.8 billion in rebates for home energy efficiency and electrification projects. Rhode Island is eligible to receive \$32,006,100 for the HER program and \$31,820,030 for the HEAR program.

These home energy rebates will help American households save money on energy bills, upgrade to clean energy equipment, improve energy efficiency, and reduce indoor and outdoor air pollution. For additional information about these programs, please visit the Home Efficiency Rebates and Home Electrification and Appliance Rebates webpages from the United States Department of Energy.

Eligible Respondents

Anyone can respond to this RFI. In particular, we are interested in responses from program administrators, local governments, energy contractors, labor organizations, manufacturers of efficiency equipment and materials, community-based organizations, and residents.

Instructions for Responding to this RFI

Responses are due by Friday, February 23rd at 5:00 pm.

Responses should be emailed to Karen Bradbury (karen.bradbury <u>@energy.ri.gov</u>) with the subject line "HER-HEAR Program – [*Respondent's Name*]". Responses delivered by hand, mail, or any other method will not be accepted.



You do not need to respond to all questions or sub-questions to submit a response. Please limit your response to this RFI to fifteen (15) single-spaced pages and submit them as either a Microsoft Word or PDF file. Please label your responses according to the question number. Shorter responses or general thoughts/feedback can be submitted in the body of an email.

Submitting Questions about this RFI

Any questions regarding this RFI can be submitted to Karen Bradbury (karen.bradbury@energy.ri.gov).

Disclosure & Waiver Authority

The Program Team may, from time to time, make changes or modifications to this RFI. It is the responsibility of the respondents to regularly monitor the OER website for any addenda or modifications to this RFI.

The Program Team is not making public funding available for this RFI. No conditions or provisions of this RFI shall bind the Program Team to award any funds; pay any costs incurred in preparing a response; or procure or contract for services or supplies with any respondent or any other entity in connection with this RFI.

Responses to this RFI may be subject to the Access to Public Records Act (APRA, R.I.G.L. 38-2-1) so please do not send market sensitive information, or please clearly label such information as confidential.



Request for Information Categories and Questions

A. Respondent Contact Information

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

B. Accessible and Equitable Program Design

- 2. What best practices can program administrators and other relevant stakeholders (e.g., retailers, contractors, or community-based organizations) use to ensure that disadvantaged communities and low-income households are aware of and have easy access to the Home Energy Rebate programs?
- 3. How can OER encourage program administrators to design their rebate programs to align with the Justice40 Initiative, which commits to delivering forty percent of the overall benefits (home improvements, jobs, etc.) from certain federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution?
- 4. How can OER ensure that community-based organizations, residents of disadvantaged communities, renters, and marginalized groups such as low-income residents, residents of color, rural residents, and Tribal residents are meaningfully engaged for the Home Energy Rebate programs? What other groups should be included?
- 5. How can the Home Energy Rebate programs help to minimize energy burden and costs, particularly in low- and moderate-income (LMI) and high energy burden households?
- 6. What types of program design approaches, guidelines, tools, savings analyses, policies, or reviews can help discourage contractors from using rebates for upgrades that will likely result in higher annual household energy bills, particularly for low-income households?
- 7. What types of policies or requirements can be used to ensure that owners of rental properties receiving rebates targeted for low-income households continue to offer affordable rents for a reasonable time after improvements are made? How might OER also incentivize multifamily affordable housing property owners to participate in these programs?
- 8. What are best practices for implementing successful 'point of sale' rebates, including when considering contractor needs?



- 9. For federally subsidized, low-income housing, what specific program design parameters are necessary to ensure rebates can be used at these properties?
- 10. What quality control measures are needed to ensure that contractors practice safe and healthy homes best practices, and that projected savings are achieved?
- 11. Which Home Energy Rebate program components across Sections 50121 and 50122 should be implemented separately or together? Some examples could include:
 - (i) Marketing, communications, branding
 - (ii) Income verification
 - (iii) Rebate processing
 - (iv) Contractor requirements
 - (v) Home energy assessments
 - (vi) Data collection and reporting

C. Designing Programs for Maximum Impact

- 12. What evaluations of similar programs exist that can provide lessons learned and recommendations for effective program guidance, support, and best practices?
- 13. How should OER measure success? Examples may include high customer satisfaction, measured or estimated benefits (e.g., impacts on energy, bills, emissions, health, or peak demand), quality job creation, valuation of home upgrades or overall efficiency, etc. What specific data is needed to evaluate progress toward these recommended metrics of success?
- 14. What data should OER collect throughout the program for the purposes of evaluation? What evaluation protocols should OER put into place before program implementation begins?
 - a. How often should OER evaluate the program?
 - b. What specific data is needed to evaluate program success in reaching disadvantaged communities?
- 15. How should these programs be designed to spur durable market demand for efficient and electrified homes? How can program designs best assure continued funding and financing for home efficiency and electrification improvements even after these funds have been depleted?



- 16. Based on past successes, what practices and/or policies should program administrators use to drive higher energy savings per rebate dollar invested (e.g., measure bundling, order of installation, home characteristics, or sizing equipment after insulation/sealing)?
- 17. Should program administrators establish set-asides or limits concerning the distribution of the rebates (e.g., bundled packages, disadvantaged communities, income or other definitions, incumbent heating fuel in the home, high-impact measures)?
- 18. What best practices, like bulk purchasing or bulk installation, should program administrators consider to reduce implementation costs for rebate recipients or to maximize the reach of program funding?
- 19. What practices should OER include in program design to maximize uptake such as interim targets, incentives to contractors to install eligible equipment, or partnerships with for-profit, non-profit, or municipal entities?
- 20. How can programs ensure effective consumer education and outreach? What types of tools and/or materials should OER develop to support consumers in understanding how to maximize the benefits of these programs?
- 21. What program design requirements are necessary to support increased investment in new business models, with the long-term goal of sustained financial and market investment and accelerated market adoption?
- 22. While the electrification rebates allow for application in both new construction and existing buildings, are certain uses more likely to deliver greater benefits? For example, should electrification rebates focus primarily on existing buildings where such improvements are less likely to happen without additional funds? Are there important other applications (e.g., new construction of affordable housing, other?)

D. Integrating Existing Incentives & Programs

- 23. How can OER encourage programming to build on and coordinate these funds with existing networks and programs to maximize impact? Other programs may include state energy efficiency Revolving Loan Funds (RLF), utility energy efficiency programs, U.S. Department of Health & Human Services Low Income Home Energy Assistance Program (LIHEAP), Weatherization Assistance Program (WAP), tax incentives, among other funding sources.
 - a. What guidance is needed to make this successful?



- b. How should OER encourage programs and participants to leverage other resources and/or provide seamless services?
- c. What concerns and risks should OER be aware of in introducing these programs into existing programs and networks? How can OER prevent the layering of federal, state, and local incentives whose combined value is greater than that of the product being purchased?
- 24. What are potential barriers to effective program energy savings attribution? Are there best practices to address these barriers?
- 25. What safeguards can OER put in place to ensure that low-income households are optimally served through various available programs (e.g., Home Energy Rebates, WAP, or other low-income weatherization programs)?
- 26. What safeguards can program administrators put in place to ensure local utility rebates and other local funding that existed before the Home Energy Rebates are not decreased in response to the availability of the Home Energy Rebates?

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

- 27. What have evaluations found to be key drivers of success in accurately modeling or predicting energy savings?
- 28. What recommended methodologies or standards could be used by states/programs to calculate energy savings and associated impacts, such as greenhouse gas emissions reductions? What software is used to implement that methodology? What are the key inputs and features?
- 29. What software tools provide any of the following capabilities?
 - (i) Energy usage calibration consistent with BPI 2400
 - (ii) Open-source advanced measurement and verification
 - (iii) Savings valuation based on time, location, or greenhouse gas emissions
 - (iv) Third-party certified documentation of the work scope and predicted impacts
 - (v) Other capabilities of interest, including but not limited to use of standard data schemas (e.g., HPXML), application programming interfaces (API) integrability, etc.
- 30. Do you have any recommendations for applying BPI 2400 per the legal requirements of the Home Efficiency Rebates?



31. The Home Efficiency Rebates refer to savings based on "time, location, or greenhouse gas emissions." Please provide input on best practices for calculating savings based on these factors. How should program administrators value these savings in comparison to homeowner energy usage and bill reductions?

F. Eligible Technologies for Rebates

- 32. How should OER facilitate that clear information regarding qualifying technologies and projects is readily available to consumers, contractors, retailers, and other relevant stakeholders?
- 33. The Home Electrification Rebates specifies that qualified electrification projects must include the purchase and installation of certain equipment or materials. Should other related improvements (e.g., smart thermostats, sensors and controls, LEDs) be allowable as part of a qualified electrification project for the purposes of calculating total project costs which can in turn affect the final rebate amount?
- 34. Should rebates be allowed in instances where use of the rebate-eligible equipment or measure is already required by local code?

G. Data Access and Sharing

- 35. What should OER consider when drafting energy usage data sharing guidelines?
- 36. What are best practices for minimizing the complications of data collection, allowing data sharing where needed, and ensuring data security? Is there an opportunity to build upon Green Button and Green Button Connect?

H. Compliance and Quality Assurance

- 37. How can program administrators track participation in rebate programs to protect against:
 - (i) Double-dipping between various federally funded state grant programs for the same upgrade
 - (ii) Households receiving more funds than are allowable under the law
 - (iii) Contractors/installers purchasing equipment in a way that violates the prohibition of combining efficiency and electrification rebates
 - (iv) Claims for work not done



- (v) Improper installations
- (vi) Ineligible products
- (vii) Falsifying income eligibility
- (viii) Other risks please identify other risks
- 38. What types of quality assurance and/or quality control should OER require? What are recommendations for best practices?
- 39. What data should OER and program administrators collect to ensure their ability to conduct effective quality assurance and/or quality control?

I. Job Creation & Quality

- 40. Which contractor and/or laborer credentials and/or certifications should OER and/or program administrators require for work funded in part by these rebates?
- 41. What practices are needed to ensure quality installations? Please provide examples of how existing efficiency or electrification programs track quality installations by contractor.
- 42. How can OER assure that these rebates support quality construction jobs and quality non-construction jobs?

J. Buy America and Supply Chain Considerations

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

K. Open Response

- 45. Is there anything else OER should be aware of as it develops program design guidance and support for these rebate programs?
- 46. What evaluations, research, reports, or other resources can help inform OER's program guidance?