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HOMES Pay for Performance Program Solicitation Concept Paper



Figure 1: California Energy Commission Logo

Solicitation # TBD
State of California
California Energy Commission
Month, Year TBD

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Attachments

The CEC currently intends to issue the solicitation as a Grant Funding Opportunity rather than a Request for Proposal. Depending on the selected solicitation vehicle, it will include additional terms and conditions as follows:

Grant Funding Opportunity (GFO)	Request for Proposals (RFP)
Special Terms for Confidential Information	Special Terms and Conditions for Confidential and Personal Information
Federal Award Terms and Conditions	Federal Contract Terms and Conditions
Special Terms and Conditions, Insolvency, Bankruptcy or Receivership	CEC Special Terms and Conditions
Program Terms and Conditions (includes budget detail and payment provisions)	Generative AI Special Provisions
	Budget Detail and Payment Provisions

	State's General Terms and Conditions
	Confidential Deliverables and Pre-existing Intellectual Property Lists

I. Introduction

PURPOSE OF SOLICITATION CONCEPT PAPER

The purpose of this HOMES Pay for Performance Program Solicitation Concept Paper is to seek stakeholder and public input prior to the CEC's release of a potential, forthcoming solicitation for a Statewide Implementer (SWI) for California's Home Efficiency Rebates (HOMES) Pay for Performance (P4P) Program (Program). The proposed terms in this concept paper are subject to revision.

The California Energy Commission (CEC) is deploying a portion of its Inflation Reduction Act authorized HOMES award from U.S. Department of Energy (DOE) to establish a statewide residential program in which rebates will be paid based on energy savings measured at the meter.

With oversight from CEC, the SWI will be responsible for deploying over \$90 million in rebates for homeowners to upgrade their energy equipment and appliances.

Additionally, the SWI will maintain alignment with program rules, elevate policy issues, and provide program data to CEC. CEC will provide guidance, direction, task pre-approval, and performance reviews and corrections. CEC will request federal funds, assume responsibility for quarterly performance reporting to DOE and oversee the SWI's project reporting to DOE.

The Program includes a key role for Aggregators who will help Contractors estimate energy savings and rebate values and deliver portfolios of projects to the Program. The SWI will support CEC with Program design and planning; recruit, manage and support Aggregators and Contractors; manage the day-to-day functions of the program including data collection, rebate applications, rebate payments and reporting; and conduct measurement and verification (M&V) of energy savings.

The Agreement is anticipated to have a not-to-exceed amount of \$16,500,000 for administrative services and \$90,750,347 in Rebate Reimbursement Funds as detailed below and a term of four years with an optional one-year extension at CEC's review and approval.

Bidders/Applicants are encouraged to collaborate with subcontractors to create a team of professionals with expertise to perform specific tasks or components in order to fulfill all tasks in the work scope.

AVAILABLE FUNDING

Administrative Services

This Agreement is a combination of hourly rate and volume-based unit deliverables for Administrative Services for implementing the HOMES P4P Program. A total of \$16,500,000 for administrative services is available for award under this solicitation.

- \$15,750,000 is for **Administrative Expenses** related to planning and implementation of the Program.

- \$750,000 is available as **SWI Performance Incentives**, funds that may be claimed for payment upon CEC verification of the SWI achieving the following types of performance metrics:
 - \$TBD when the first TBD projects are installed and have passed QA/QC checks, and the M&V performance period has begun.
 - \$TBD when TBD different Aggregators have submitted rebate applications for projects that have completed QA/QC checks.
 - \$TBD for each project that completes the M&V process

Rebate Reimbursement Funds

The Statewide Implementer will be responsible for deploying \$90,750,347 in Rebate Reimbursement Funds to Eligible Rebate Recipients.

Funding Conditions

CEC, at its sole discretion, reserves the right to increase or decrease the amount of funds available under this solicitation. Without limitation to any other of CEC's rights and remedies, if any of the federal funds for the HOMES program become unavailable; are reduced; or are deleted, for any reason including, but not limited to, DOE's failure to provide sufficient funds to the state of California for the work identified in Exhibit A, or for CEC administrative costs to oversee and implement this Agreement, as CEC may in its sole discretion determine, the CEC shall have the option to either:

- 1) cancel this Agreement with no liability occurring to the CEC; or
- 2) offer an Agreement amendment to the Recipient to reflect a reduced amount of funds.

Should CEC choose to cancel this Agreement, CEC shall have no liability to pay any funds whatsoever to the Agreement Recipient, any subrecipients, and any vendors; nor to furnish any other consideration under this Agreement; and the Recipient shall not be obligated to perform any provisions of this Agreement.

DOE will evaluate project performance, the extent milestone objectives are met and compliance with DOE program rules and reporting requirements. Awarded funding may be paused or suspended, pending DOE review. In the event funds are not made available or approved, the CEC shall have no further liability with regard to the agreement. In the event that funds are available but reduced, the CEC reserves the right to reduce the agreement amount to an amount deemed appropriate. In this event, the Recipient and Commission Agreement Manager (CAM) shall meet and reach agreement on a reduced scope of work commensurate with the level of available funding.

PERIOD OF PERFORMANCE

The Agreement resulting from this solicitation has a four-year term, ending no later than September 30, 2031. The CEC has the option of approving a one-year extension. The federal HOMES Program was statutorily approved through September 30, 2031 and the CEC's HOMES award period of performance currently runs through July 31, 2028. The tenure of this Agreement is conditional upon DOE extending CEC's period of performance as statutorily allowed.

HOW AWARD IS DETERMINED

This is a competitive solicitation with the award made to the Bidder/Applicant with the highest passing score, after calculating any preferences, incentives, bonus points, and/or past performance reference checks.

PROGRAM REQUIRED QUALIFICATIONS:

1. Demonstrated knowledge of residential energy efficiency market dynamics and relevant technologies.
2. Experience managing or implementing large and/or complex energy incentive programs.
3. Experience managing Contractor networks.
4. Experience managing and complying with the use of public or ratepayer funds.
5. Experience with energy usage data analysis and advanced measurement and verification protocol(s).
6. Capacity to analyze and safeguard large confidential data sets like Interval Meter Data.
7. Track record of providing high-quality customer service for consumers and contractors.
8. Capacity to build and manage user-friendly platforms for external parties to submit data and documents; and for tracking, reporting and integration.

PRE-BID/APPLICATION CONFERENCE

There will be one Pre-Bid/Application Conference; participation in this meeting is optional but encouraged. The meeting will be recorded, and questions will be answered during and after the event. The Pre-Bid/Application Conference will be held at the date, time and location listed below.

REFERENCE DOCUMENTS

Bidders/Applicants responding to this solicitation may want to familiarize themselves with the most recent version of the following documents. DOE documents are available on the pre-solicitation workshop page on the CEC website, which will be included as a link in the workshop Notice.

1. DOE Published Guidance:
 - a. Home Energy Rebates Program Requirements & Application Instructions
 - b. Home Energy Rebates Program Funds Administrative and Legal Requirements
 - c. Home Energy Rebates Program Data & Tools Requirements Guide
 - d. Launching a Measured Pathway Home Efficiency Rebates Program
2. DOE Federal Assistance Reporting Checklist, Attachment 2 of California's HOMES Award
3. CEC [Docket Log Inflation Reduction Act and Residential Energy Programs](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-DECARB-01) available at: - (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-DECARB-01>)
4. CEC Workshop on Inflation Reduction Act Home Efficiency Rebates (HOMES) Program [webpage](https://www.energy.ca.gov/event/workshop/2024-03/workshop-inflation-reduction-act-home-efficiency-rebates-homes-program) available at: - (<https://www.energy.ca.gov/event/workshop/2024-03/workshop-inflation-reduction-act-home-efficiency-rebates-homes-program>)

PROGRAM BACKGROUND

Key Words/Terms

Word/Term	Definition
Administrative Expenses	Expenses related to planning and implementation of the Program. These costs are further defined in the Inflation Reduction Act Home Energy Rebates Program Requirements & Application Instructions under the definition of “Administrative Costs” as well as under “Rebate Funds” subsection 2, which lists activities directly related to delivery of rebates to eligible rebate recipients.
Agreement	Agreement document between CEC and awarded Recipient selected through this competitive Solicitation.
Aggregator	Contractor, project developer, energy consultant, energy technology company, or other entity approved for participation by the SWI to submit portfolios of eligible projects to the program for rebates.

Application/Proposal	A Bidder's/Applicant's formal written response to this Solicitation.
Bidder/Applicant	An entity that submits a proposal/application to this Solicitation
CAM	Commission Agreement Manager
CAO	Commission Agreement Officer
CEC	California Energy Commission
Commission	California Energy Commission
Community Choice Aggregator (CCA)	Cities, counties, or other governmental entities within investor-owned utility territories that procure electricity for the residents and businesses within a geographical area. A List of California CCAs is available at: (https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-load-serving-entities-lses).
Contractor	An entity enrolled in the program by the SWI, and which is hired by homeowners to install energy upgrades as allowed by the HOMES P4P Program. For the purposes of this document, the term "Contractor" means an installer of energy equipment, not the entity which would serve as the SWI, should CEC decide to structure the solicitation and resulting Agreement as an RFP and contract.
CPUC	California Public Utilities Commission
DAC	Disadvantaged community. As required by federal statute, the HOMES P4P Program will provide an additional \$200 rebate to contractors who retrofit a home in a DAC. Subject to DOE approval, California will utilize the definition of disadvantaged communities per the California Environmental Protection Agency under the authority of California Senate Bill 535 (De Leon, Chapter 830, Statutes of 2012). A map of Disadvantaged Communities is available at (https://oehha.ca.gov/calenviroscreen/sb535).
DOE	United States Department of Energy
DOE Program Rules	Guidance provided by the DOE for the HOMES program. This guidance includes, but is not limited to, the following documents: <ol style="list-style-type: none"> 1) Home Energy Rebates Program Funds Administrative and Legal Requirements (ALRD) 2) Inflation Reduction Act Home Energy Rebates Program Requirements & Application Instructions 3) Home Energy Rebates Program Data & Tools Requirements Guide

	The term “DOE Program Rules” refers to the current and most recent DOE guidance. DOE Program Rules are subject to change by DOE.
EBD Direct Install Program	The Equitable Building Decarbonization Direct Install Program provides no-cost retrofits to eligible households and is administered by the CEC. A portion of the total HOMES award will be used to support the program, which is distinct from the HOMES P4P Program.
Eligible Rebate Recipient	A homeowner, Aggregator or multifamily building owner, as defined in the DOE Program Rules.
GHG	Greenhouse gas
HEEHRA	The Home Electrification and Appliance Rebates Program (HEEHRA) is a statewide initiative funded by the federal Inflation Reduction Act, overseen by the U.S. Department of Energy. HEEHRA is designed to help households improve energy efficiency and indoor air quality through the installation of energy efficient electric appliances.
HOMES	The Home Efficiency Rebates Program (HOMES) is a statewide initiative funded by the federal Inflation Reduction Act, overseen by the U.S. Department of Energy, and CEC. HOMES is designed to help households improve energy efficiency, reduce peak demand, and improve grid resilience through the installation of energy efficient retrofits to building envelopes.
HOMES Award	DOE’s formula award to the CEC under the Home Efficiency Rebates Program, and all the associated terms and conditions of that award.
IOU	Investor-Owned Utility. A large electric distributor that issues stock owned by shareholders. A list of California IOUs is available at: (https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-load-serving-entities).
IRA	Inflation Reduction Act. Pub. L. 117-169 available at (https://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf).
Load flexibility	Ability to shift or reduce electric load or demand away from times when electricity is expensive, polluting, and scarce to times when it is inexpensive, clean, and plentiful.

Low-income household	A household below 80 percent Area Median Income (AMI), consistent with DOE Program Rules.
Measured Pathway	A program path within HOMES, consistent with DOE Program Rules, that uses advanced open-source measurement and verification methodology to measure energy savings post-project installation and provides rebates for homes that achieve measured energy savings of at least 15 percent.
M&V	Measurement and verification. A methodology to determine and document weather-normalized energy use of a home or portfolio of homes before and after the implementation of home energy upgrades.
Market Access Program (MAP)	<p>The CPUC authorized the Market Access Program model as a strategy to reduce peak demand for summer reliability purposes. The approach describes a set of programs that are generally characterized by rules for aggregator eligibility and project qualifications. The payment terms to aggregators are based on the avoided costs to the grid, measured using NMEC methods.</p> <p>CPUC (D.23-06-055) requires IOUs and Marin Clean Energy to offer and administer cost-effective energy efficiency programs using the MAP approach as part of their energy efficiency portfolio.</p>
Normalized Metered Energy Consumption (NMEC)	Normalized Metered Energy Consumption (NMEC) is a method established and governed by the CPUC used to measure gross energy savings using metered energy consumption data to compare baseline and reporting period consumption under normal operating conditions. Normalization of energy consumption is achieved using adjustment models that account for routine events, and other adjustments to account for non-routine events so that consumption in baseline and reporting periods can be directly compared, as if all relevant variables were the same in the two periods.
Participant	A building owner with either a confirmed rebate reservation from the SWI or a completed HOMES P4P project, approved by the SWI.
Pay for Performance (P4P)	A program model where qualified aggregators identify and submit project installations completed by Contractors and receive incentives based on the actual measured energy savings after a measurement & verification period.

Project	An eligible residential building decarbonization A project may be for a single building or multiple buildings in a community depending on how installations are bundled.
PNNL	Pacific Northwest National Laboratory
PNNL Workflows	These workflows define the step-by-step procedures that relevant stakeholders (such as state energy offices, implementers, and vendors) generally follow to participate in and administer the program(s) effectively. States must use DOE workflows or have alternatives approved by DOE.
POU	Publicly Owned Utility. A non-profit furnishing electric services which is managed by locally elected officials or public employees subject to local public control and regulation. POUs are organized in various forms including municipal district, city department, irrigation districts, or rural cooperatives. A list of California POUs is available at: (https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/electric-load-serving-entities).
Rebate Reimbursement Funds	Funds used for reimbursement or providing a cost discount for eligible upgrades based on energy savings.
Recipient	The Bidder/Applicant chosen to receive an award under this Solicitation, also referred to as the Statewide Implementer. In this document, the term “Contractor” is used to mean an entity hired by homeowners to install energy upgrades. To avoid confusion, the word “Recipient” in this document means the entity selected either through a Request for Proposal (RFP) or a Grant Funding Opportunity (GFO). With regard to federal funds as part of this agreement, an entity selected through an RFO would be equivalent to “Contractor” defined under 2 CFR 200.1 and an entity selected through a GFO would be a “Subrecipient”.
Regional Energy Network	Local government entities authorized by the CPUC to administer energy efficiency programs for residents, businesses, and institutions in their jurisdictions.
Section 1353 Regulations	Section 1353 refers to a regulation within the California Code of Regulations, Title 20, which primarily deals with the requirement to submit disaggregated demand data, meaning detailed information about electricity usage broken down by specific categories like residential, commercial, and industrial, by entities subject to the regulation. This data must be submitted electronically and comply with reporting guidelines outlined in other sections of the code, including Section 1342.

Subcontractor	A person or entity that receives funds directly from the Recipient and is entrusted by the Recipient to make decisions about how to conduct some of the HOMES P4P Program activities. A subcontractor's role involves discretion over agreement activities and is not merely selling goods or services.
Super Aggregator	A Program Administrator, like a Regional Energy Network or Community Choice Aggregator which enrolls a portfolio of projects in the Program with the intent of layering or stacking HOMES rebates with their local programs.

Federal HOMES Program

In August of 2022, Congress passed the Inflation Reduction Act, Pub. L. 117-169 (IRA), which introduced two major home rebate programs: the HOMES Program to improve the energy performance of an entire home, and the Home Electrification and Appliance Rebates (HEEHRA) Program for energy equipment and appliance rebates for low-to-moderate income residents. The IRA allocated California \$291 million in HOMES formula funding.

Program Development Process

The CEC planned a Pay for Performance (P4P) Program after holding a public workshop and seeking input on HOMES program design. A Request for Information released in December 2023 drew comments from close to 50 organizations, with many supporting utilizing HOMES funding for the EBD Program, and many also encouraging CEC to allocate funds toward a separate program that would utilize the HOMES “measured pathway” approach for rebates. In March 2024, CEC staff held a full-day public workshop on the concept of a measured, performance-based pathway. The workshop was attended by over 350 individuals and was followed by an additional public comment period.

CEC submitted its HOMES application to DOE in August of 2024 and DOE approved CEC's award in January 2025. Prior to program launch, CEC will submit four blueprint implementation plans to the DOE for review and approval. CEC's application to DOE included both the EBD Direct Install and Pay for Performance concepts, splitting funding as follows:

1. \$154 million (for administrative services and rebate reimbursements) to the CEC's EBD Direct Install Program, which provides no-cost upgrades for low-income households
2. \$107 million (for administrative services and rebate reimbursements) for a statewide pay for performance program

Pay for Performance Program Overview

The HOMES P4P Program will follow DOE's measured savings pathway, in which rebate values will be based on actual energy savings measured at the meter. The Program will be offered statewide and be made available to residents of all income groups.

The Program will advance energy efficiency and grid resiliency goals. In alignment with federal requirements, P4P rebates will be structured to reward energy savings during peak demand times and possibly in grid-constrained locations. Rebates will support efficiency measures. While HOMES P4P will be a market-driven, performance-based program, DOE's program rules, including estimated rebate values passed to residents and other robust consumer protections mean that the SWI will play a "high touch" role in each rebated project.

Program Roles

The table below provides a brief snapshot of the responsibilities and roles played by different entities as part of the Program.

Entity	Summary of role
California Energy Commission	Sets program rules and finalizes blueprint plans for DOE (in consultation with SWI); pre-approves, oversees and tracks SWI activities; analyzes program data; reviews program performance, working with SWI to make adjustments and course corrections when necessary; provides quarterly financial reports to DOE; oversees SWI reporting on project data; requests federal funding.
Statewide Implementer	Manages day-to-day program operations including Contractor and Aggregator activities and consumer protection functions; develops and maintains platforms to receive and process rebate applications and related data; performs Measurement & Verification of project savings; reports program data.
Aggregators	Help Contractors identify homes with high-savings potential and estimate rebate value; bundle projects and submit them to the Program; provide up-front, estimated rebate payments to contractors; receive rebate payments based on actual savings at the end of the measurement period.
Contractors	Scope projects and share energy and bill impacts with consumer; install energy efficient upgrades in alignment with Program requirements; provide discounts to customers equivalent to a set portion of estimated rebate value; provide project documentation; receive up-front rebate payments from Aggregators.

Homeowners	Choose and hire a Contractor enrolled in the Program; select energy performance upgrades; authorize use of energy data for M&V; receive rebate at the time of installation, based on estimated energy savings.
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Statewide Implementer (SWI) Overview

The CEC will select a SWI to help design and provide comprehensive implementation of the HOMES P4P program. Design tasks include supporting CEC’s finalization of program requirements, possibly providing input on implementation blueprint plans for DOE, and continuous program evaluation and improvement. Specific design needs will depend on the status of program development at the time the SWI begins work and will be subject to CAM approval. Implementation will include contracting with and overseeing any subcontractors in the program. CEC expects that implementation tasks will include: managing day-to-day operations, developing or providing data platforms to receive rebate applications and related data, overseeing Aggregator and Contractor participation, verifying project eligibility, storing and reporting data, creating rebate reservations, performing project QA/QC, and performing customer service and consumer protection functions. The SWI will also be responsible for performing measurement and verification of energy savings, calculating rebate values, and issuing rebate payments. Additionally, the SWI will frequently share program and project data with CEC, with the long-term goal of real time sharing through development of an API.

In contrast with several of the CPUC-authorized Market Access Programs that similarly take a measured-savings approach to rebates, the SWI’s compensation will not be based on energy savings. While the SWI’s duties will include supporting Aggregators and helping them to be successful in the Program, the SWI must measure and determine Aggregators’ energy savings performance without conflict of interest. In addition to payment for time, materials, and volume-based unit deliverables, the SWI will receive performance-based compensation incentives for program achievements as detailed above. CEC expects bids/applications for the SWI agreement to include organizational teams of partnered or subcontracted entities.

Measured Pathway

The P4P Program will follow DOE’s guidance for “Measured Home Efficiency Rebates” which requires that final rebate values be calculated using 12 months (including both peak seasons, if applicable) of post-installation energy consumption data. Portfolios of projects must achieve energy savings of at least 15% measured using DOE-approved open-source advanced M&V software. Both electric and gas savings will be incorporated into the savings analysis and rebate value calculation. In alignment with federal statutory requirements, CEC plans to structure incentive formulas to reward energy savings during peak demand times and possibly in grid-constrained locations.

CEC will consider and explore with the SWI potential advantages of using M&V methodology consistent with rules set by the California Public Utilities Commission (CPUC) for Population-Level Normalized Metered Energy Consumption (NMEC). For

the HOMES P4P program to integrate easily with the existing CPUC-authorized Market Access Programs (MAPs), the M&V may need to be consistent with NMEC rules.

Aggregator Roles and Responsibilities

Aggregators play a key role in P4P program delivery. Aggregators help Contractors identify homes with high energy savings potential, estimate project level energy savings and estimate rebate values. Aggregators may act as the interface between Contractors and the Program, assisting the Contractors with confirming eligibility and collecting all required project data. The CEC will determine final rules as to what percentage of the estimated rebate must be provided to the homeowner, subject to DOE approval. Aggregators may retain the remaining rebate value, or to pass on all or a portion of the remaining value to the Contractor on the project.

The Scope of Work requires the SWI to provide mid-cycle energy usage data to Aggregators, to the extent the data is available, to help Aggregators manage and improve project savings and consistently improve their savings estimates over time. Upon the completion of the 12-month post-installation M&V period, after receiving final energy savings data from the SWI, Aggregators are responsible for assigning their projects to portfolios. Portfolios are required to achieve at least 15% measured energy savings in order to receive rebates. Periodically, the SWI will review portfolios to identify the variance between Aggregator savings estimations and actuals.

Aggregators will provide a critical source of rebate financing. They pay upfront project payments to contractors once the SWI has completed project QA/QC checks and prior to the 12-month post-installation M&V period. Aggregators will receive final rebate payments after the completion of M&V. If savings exceed estimates, Aggregators will receive additional payments, subject to a cap of 120% of estimated savings. Aggregators may retain or share excess payments with Contractors.

Financing of Rebates

DOE guidance contemplates customers receiving the value of their estimated rebate, upfront, at the time of project installation. Additionally, it may be burdensome for Contractors to carry the costs of the HOMES rebates for more than a very short duration. However, HOMES rebates are not paid out to Aggregators until after the 12-month performance period. Thus, to make Contractors whole, the CEC expects a financing need for each rebate for a 15-18 month period, considering the performance period, followed by the time it takes for utilities to provide their data to the CEC and for the SWI's M&V calculations.

In its August, 2024 application to DOE, CEC proposed a plan to utilize HOMES rebate funds to pay a 50% Progress Payments to Aggregators following project installation. In June, 2025 DOE responded to CEC that they do not expect to expand partial payments (from what is allowed through the modeled pathway) to the measured pathway.

At this time, CEC assumes that Aggregators will need to finance the value of the rebate until HOMES rebates are paid. CEC continues to explore options to help Aggregators obtain financing at the lowest possible cost and is seeking stakeholder input on this topic.

Rebate values

CEC received DOE approval, in alignment with federal statutory requirements, to weight incentive values such that energy savings during peak demand times will be valued higher than energy savings achieved during off-peak times. Rebate values for low-income customers will be double that of market rate customers. The CEC also received approval to put a state cap on rebate values to avoid excessively large rebate payments to single individuals for high-cost, high-savings projects. The CEC is exploring the possibility of weighting rebate values to reward savings in grid-constrained locations, subject to DOE approval. CEC staff expect to finalize incentive formulas in consultation with the SWI. The SWI will make incentive formulas public and transparent to enable Aggregators to estimate savings for Contractors evaluating projects.

Eligibility

- **Income.** Residential building owners of all income levels will be eligible for HOMES P4P rebates.

DOE's requirement that states deploy a minimum amount of rebate dollars to low income and low-income multifamily properties is currently anticipated to be satisfied through the HOMES award funding to the CEC's Equitable Building Decarbonization program which serves exclusively low-income residents. This means that all P4P rebate funds are accessible for residents of any income level. To encourage participation from low-income residents, CEC has proposed, and DOE has approved, doubling the available incentive for the HOMES P4P program.

- **Building type.** While owners of both single and multi-family buildings are eligible, it is expected that the Program will see significantly higher uptake from single family homes because of challenges for multi-family properties including the owner-tenant split incentive and complexities with measuring savings.
- **Utility Data Sufficiency and non-routine events.** The CEC is interested in making the HOMES P4P Program available to as many Californians as possible. This includes residents who may be considered, through the lens of other performance-based programs, to have insufficient baseline data or disqualifying events. For example, CEC intends to include residents who may have installed solar PV or electric vehicle charging within the last 12 months, are considering installing solar PV or electric vehicle charging, or who have resided in their homes for less than twelve months. DOE must approve a state's choice of open source, advanced M&V software to be used for the HOMES program. To the extent that DOE-approved software includes protocols for including the above-mentioned customer groups, CEC expects the SWI to develop methodologies to include them in the Program.

- **Alternative Fuels.** The P4P program initially will be available to customers using gas and electricity, as these energy sources are currently readily measurable through existing advanced M&V frameworks. The CEC may task the SWI with exploring methods for accurately measuring energy savings for homes using alternative fuels, such as propane or fuel oil, with the goal of expanding the program once viable measurement tools are established.

Allowable Measures

The P4P program will fund efficiency measures. All equipment and appliances installed must meet ENERGY STAR® requirements when applicable. Final rules for allowable measures, efficiency requirements, other project requirements and criteria for determining “project cost” will be developed in partnership with the SWI and approved by CEC.

Utility Data Access

Access to Participants’ utility data is a necessary component of the Measured Pathway, and a requirement to participate in the program.

The CEC expects the SWI to access utility data through different pathways, as described below. As a requirement of receiving a HOMES P4P rebate, all potential Participants will need to provide their authorization for the CEC, SWI, Aggregators and DOE to access their pre-and post-project energy consumption data. The SWI should expect that Participants may have separate gas and electric utility providers, and a particular Participant’s utility data may be accessed through two different pathways.

1) Title 20, Section 1353 reporting.

Through the California Code of Regulations, Title 20, Section 1353 – Disaggregated Demand Data Reporting, any utility distribution company or gas utility that has experienced a peak electricity demand of 1000 MW, or has had annual natural gas deliveries of 200 million therms or more in both of the two calendar years preceding the required data filing date, is required to report disaggregated demand data to the CEC on a quarterly basis. The CEC’s data infrastructure has been constructed to enable data sharing with authorized third parties contracted by the CEC. Most California households fall under this data access pathway. The utilities currently subject to these regulations include:

- a. Pacific Gas and Electric
- b. Southern California Edison
- c. San Diego Gas and Electric
- d. Sacramento Municipal Utilities District
- e. Los Angeles Department of Water and Power

f. Southern California Gas Company

Section 1353 data include interval consumption data for some utilities and monthly billing data for others.

2) Direct data sharing from Publicly Owned Utilities.

CEC plans to encourage POU's which are not subject to Section 1353 reporting to enter into data-sharing agreements for HOMES P4P Participants. CEC expects these agreements could provide for POU's to share Program Participant's monthly billing data. The format and frequency/timing of the data sharing is to be determined.

3) Customer provision of utility bills.

If a POU is not interested in a data sharing agreement with CEC, then, to participate, customers of that utility will need to share pre- and post-installation utility bills directly with the program. In these cases, sharing pre-installation billing data prior to project and rebate approval will be a condition of participation in the program. The Aggregator bears the risk that Customers do not provide their final, post-project data as the payment of the final rebate to the Aggregator will be contingent upon the customer directly sharing their post-installation utility data.

4) Independently sourced utility data.

If a potential SWI chooses to independently source or contract with a POU/IOU for participant energy consumption data, they must obtain prior approval from the CEC.

II. Scope of Work and Deliverables

ABOUT THIS SECTION

This section describes the agreement scope of work, deliverables and due dates under the direction of the CAM.

GOALS AND OBJECTIVES

The goals of this agreement are to further energy efficiency, grid resiliency, and load shifting in California while contributing to the long-term market transformation of the high-efficiency residential HVAC industry. The objective of this agreement is for the Recipient to implement, in collaboration with the CEC, a statewide Pay for Performance Program that will enable thousands of Californians to make energy upgrades, improving the energy performance of their homes and reducing their energy consumption.

GENERAL REQUIREMENTS

All tasks must be completed in accordance with DOE's guidance for the HOMES program, including subsequent versions of the guidance. As noted above, DOE guidance is not limited to, but is largely conveyed through the following documents:

- 1) Home Energy Rebates Program Funds Administrative and Legal Requirements (ALRD)
- 2) Inflation Reduction Act Home Energy Rebates Program Requirements & Application Instructions
- 3) Home Energy Rebates Program Data & Tools Requirements Guide

Tasks must also be completed in alignment with CEC's approved HOMES Award and the Program parameters submitted in CEC's application.

All work on tasks will be subject to CAM approval before commencement and at review of deliverables. The SWI's approach to tasks is also subject to DOE approval of CEC deferred application narrative answers and blueprint plans and any updated direction.

The Recipient may be required to produce several iterations of draft deliverables to incorporate CEC's comments and edits. A deliverable is considered final when the CAM or designated CEC contact indicates in writing that the deliverable is considered final. When creating reports, the Recipient shall use and follow, unless otherwise instructed in writing by the CAM or designated technical project contact, the following: [Energy Commission Style Manual: Fourth Edition](https://www.energy.ca.gov/publications/2020/style-manual-fourth-edition-used-california-energy-commission-staff-lead) located at (https://www.energy.ca.gov/publications/2020/style-manual-fourth-edition-used-california-energy-commission-staff-lead).

SCOPE OF WORK TASKS

Task List

Task #	Task
1	Agreement Administration
2	Program Design
3	Aggregator and Contractor Management and Support
4	Consumer Outreach and Protection
5	Data Applications, Management, Integration and Reporting
6	Process Rebate Applications and Payments
7	Energy Data Analysis and M&V
8	Compliance and Compliance Reporting

Task 1. Agreement Administration

Subtask 1.1 Kick off meetings

- Attend a “kick-off” meeting scheduled by the CAM, and attended by the CAM, the Commission Agreement Officer, and a representative of CEC’s Accounting Office, at a mutually agreed upon date and time. The meeting will be held via MS Teams. The SWI shall include their Project Manager, Contracts Administrator, Accounting Officer, and others designated by the CAM in this meeting. The administrative and technical aspects of this Agreement will be discussed at the meeting.
- If necessary, prepare an Updated Schedule of Deliverables based on the decisions made in the kick-off meeting.

Subtask 1.2 Invoicing

Ensure accurate and timely payment for work performed under the Agreement as follows:

- Collaborate with the CAM to develop an approved invoice template for expenses incurred
 - Invoices must separate and distinguish Administrative Costs incurred and Rebate Reimbursements paid to Eligible Rebate Recipients.
- Prepare and submit invoices for all reimbursable expenses incurred performing work under this Agreement in compliance with the Terms and Conditions.
- Prepare and submit invoices that provide sufficient detail to facilitate CEC federal reporting under the HOMES Award and conform to federal accounting standards

in accordance with the HOMES Federal Award Terms and Conditions for all expenditures supported by HOMES funding.

- Collaborate with CAM on correcting and resolving discrepancies.

Subtask 1.3 Rebate Reimbursement Account Management

Optional task pending CEC evaluation as to whether advance payments are feasible and permissible:

- Develop a process to administer an account and receive funds for advanced payments for Rebate Reimbursements consistent with 2.CFR.200.305. *Note: The purpose of advanced payments would be to provide Aggregators with rebate funds in a timely manner, after the 12-month project performance and M&V period. As explained above, DOE has declined CEC's proposal to use HOMES funds for a Progress Payment, prior to the M&V period.*

Subtask 1.4 Program Meetings and Briefing

- At the request of the CAM, be available for meetings to discuss the agreement and/or collaborate on program implementation work.
- At the request of the CAM, provide written program briefings on implementation progress, requested research and analysis and/or program activity.

Subtask 1.5 Internal Controls and Processing

- Develop and submit written internal controls, processes, and procedures to implement the program in accordance with this Agreement, for review and approval by the CAM.
- Provide monthly fiscal accounting and reporting to the CAM as part of Task 1.6 Monthly Progress Reports in alignment with Task 1.2 Invoicing.
- Maintain procedures to separate, accept, track, disburse, and report on funding across all potential sources.
- At request of the CAM, update and submit written internal controls, processes, and procedures for review and approval by the CAM.

Subtask 1.6 Progress Reports

- Prepare progress reports which summarize all Agreement activities conducted by the Recipient for the reporting period, including updated program metrics, an assessment of the ability to complete the Agreement within the current budget and any anticipated cost overruns.
- The progress report should include an anticipated budget and anticipated activities for the next period, subject to CAM pre-approval.

- Each progress report is due monthly within 15 calendar days after the end of the reporting period. Program metrics will be developed with the CAM. The CAM will provide or approve the format for the progress reports.

Subtask 1.7 Execute Subcontracts

- Procure subcontractors required to carry out the tasks under this Agreement consistent with all CEC Terms and Conditions, Federal Award Terms and Conditions, and the Recipient's own procurement policies and procedures. As needed, CEC will review the subcontract agreements to ensure the tasks are consistent with this Agreement. Recipient shall provide budgets to ensure that budgeted expenditures are reasonable and consistent with current costs and applicable cost principles. The Recipient shall be responsible for the following:
- Provide CAM a list of subcontractors and timeline for entering into agreements.
- Submit a draft of each subcontract agreement required to conduct the work under this Agreement upon CAM request.
- Enter into subcontract agreements.
- Submit a final copy of the executed subcontract agreement within five (5) business days of execution.
- Manage and coordinate subcontractors' and vendors' activities.
- Manage subcontractors' and vendors' quality control and timeliness.
- Enforce subcontract agreement provisions and compliance with Terms and Conditions of the Agreement.
- Notify the CAM within fifteen (15) business days if Contractor decides to replace or add new subcontractors.
- Notify the CAM within ten (10) business days of any quality, work pauses, and non-performance issues and recommend solutions to resolve problems.

Subtask 1.8 Final meeting

- Meet with CEC staff prior to the term end date of this Agreement. The meeting will be held virtually on MS Teams. This meeting will be attended by the Contractor Project Manager and the CAM. The CAM will determine any additional appropriate meeting participants. The administrative and technical aspects of Agreement closeout will be discussed at the meeting.
- Present findings, conclusions, and recommended next steps (if any) for the Agreement, based on the information included in the Final Report.
- Prepare a written document of meeting agreements and unresolved activities.
- Prepare a schedule for completing the closeout activities for this Agreement, based on determinations made within the meeting.

Task 2. Program Design

Subtask 2.1 Design Input

As needed, and at the request and approval of the CAM, provide input and proposals for CEC consideration regarding program design elements such as:

- Incentive formula determination including potentially incorporating the Avoided Cost Calculator, relative weighting for time of savings, and/or locational valuation for grid-constrained areas
- Final rebate value caps
- Required value of rebates to be passed from Aggregator to homeowners.
- Project equipment efficiency standards and other project requirements
- Process considerations such as use of PNNL workflows versus alternative workflows
- Optional subtask if determined needed through discussions with and approval by CAM:

Layering, stacking and integration with other programs:

- Seek input from key stakeholders, including but not limited to program administrators of existing energy efficiency rebate or incentive programs, such as community choice aggregators (CCA), utilities, and regional energy networks
- When planning and designing rebate workflows, processes and software applications, seek input related to the best potential approaches to stack and layer HOMES rebates with other incentive program funding.
- Meetings and consultations with stakeholders should be virtual and without compensation. In-person meetings are subject to CAM approval.

Subtask 2.2 Research and Analysis

- As needed, and at the request of the CAM, conduct research, provide industry analysis and market assessments to develop recommendations to inform CEC's program design.

Subtask 2.3 DOE Application and Communication

As needed, and at the request of the CAM:

- Provide input for CEC consideration to revise DOE-required Plans and responses to application questions CEC deferred to the Implementation Blueprint stage. (Plans include the Education and Outreach Strategy Plan, Consumer Protection Plan, utility Data Access Plan, Privacy and Security Risk Assessment Plan and Market Transformation Plan).

- Assist CEC with communicating program design-related decisions and responding to program design-related questions from DOE.

Subtask 2.4 Program Communication

- At request of the CAM, provide input into draft memos and program summaries for internal and external audiences.

Subtask 2.5 Continuous improvement

- Continuously assess program metrics and consider lessons learned and data from program implementation to evaluate success and propose course corrections to the CAM. Implement approved recommendations for improvement in a timely manner and make recommendations for improvements.
- Once HOMES P4P is launched, seek input as to how HOMES P4P is impacting local programs.

Task 3. Aggregator and Contractor Management and Support

Subtask 3.1 Aggregator and Contractor Qualifications

- Establish required qualifications for enrolled Aggregators and Contractors, processes for enrollment, and grounds for removal from the program.

Subtask 3.2 Aggregator and Contractor Outreach and Education

With CAM approval, develop and implement a Workforce Outreach and Education plan to attract qualified Aggregators and Contractors providing Californians with a choice of contractors in all regions of the state including:

- Develop outreach partnerships with relevant organizations such as trade groups, labor organizations, utility programs, training programs, schools, and non-profits.
- Coordinate outreach with implementers of other pay for performance and rebate programs that may be stacked with HOMES.
- Identify strategic outreach channels such as websites, trade organization publications, and other channels to reach desired Contractor and Aggregator audiences.
- Develop appropriate outreach materials such as websites, digital materials, print collateral and trainings.

Subtask 3.3 Aggregator and Contractor Oversight

- Develop a participation agreement, subject to CAM approval, for Aggregators and Contractors that includes rules and expectations for program participation.

- Provide user-friendly mechanisms for Aggregators and Contractors to provide required data, documents and signatures.
- Enroll Aggregators and Contractors in the program and maintain an up-to-date public, statewide list of enrolled Aggregators and Contractors. Discuss with the CAM as to the location of the list and its integration with other Program information.
- Train Aggregators and Contractors on program and project rules.
- Monitor Aggregator and Contractor adherence to Program rules, installation standards, project rules and documentation standards and rules.
- Monitor Contractor compliance with Prevailing Wage rules for multifamily properties.
- Develop and implement a process, with approval by the CAM, for disciplinary and/or removal actions for contractors who do not comply with program rules.

Subtask 3.4 Aggregator and Contractor Support

As needed and with CAM approval, support Aggregators and Contractors to be successful in the program, including activities such as:

- Assist Contractors to prepare customer invoices that meet program documentation rules.
- Educate Contractors and Aggregators as to how they might leverage other rebate programs, such as Market Access Programs.
- Assist Aggregators and Contractors with project eligibility questions, rebate applications and the rebate process.
- When SWI determines that Aggregator or Contractor energy savings estimates are not reasonable at the time of rebate reservations, work with Aggregators and Contractors to refine estimates.
- Share M&V results and savings calculations with Aggregators and provide coaching with the aim of improving Aggregator knowledge of energy savings, improving program realization rates; and promoting overall program energy savings performance. For projects with consumption data available during the M&V period, provide Aggregators with mid performance period results to allow for addressing installation issues and for adjustments to estimates for other projects.
- Seek periodic input and feedback from Aggregators and Contractors on their experience with the program and needs.

Task 4. Consumer Outreach and Protection

Subtask 4.1 Household Outreach

With CAM approval, develop and implement a household outreach plan to reach consumers in high-potential areas including:

- Develop partnerships with relevant organizations such as local organizations, local governments, and Regional Energy Network.
- Utilize various outreach channels such as websites, digital materials, print collateral and/or direct mail when strategic and cost-effective.
- Develop outreach materials such as a Program website, fact sheets, toolkits and collateral (including customizable templates) for Aggregator, Contractor, and partner use in multiple languages as requested by the CAM.
- Integrate approved contractor list into existing platforms for consumers to identify eligible contractors.
- Integrate HOMES rebate offering with other incentive programs when possible and pragmatic.
- Inform households of the potential of layering and stacking rebates, when appropriate.
- At CAM's request, translate to non-English languages

Subtask 4.2 Participant Agreement

- Develop a Participant Agreement which includes Participant's consent to share their utility consumption data for program purposes and owners' obligations regarding tenant protections.
- At CAM request, translate to non-English languages.

Subtask 4.3 Quality Assurance and Quality Control

- Establish quality installation standards for Contractors
- Develop Quality Assurance (QA) and Quality Control (QC) Procedures.
- Conduct Desktop Reviews and virtual (or onsite, if appropriate) inspections to confirm:
 - adequate home assessment data gathering
 - measures meet efficiency standards
 - permit closures
 - compliance with DOE Combustion Appliance Safety (CAS)/Combustion Appliance Zone (CAZ) and other safety testing rules
 - compliance with all other state and local laws and requirements, and program rules
- Retain records on QA/QC Desktop Reviews and inspections

Subtask 4.4 Consumer satisfaction

- Maintain a consumer complaint hotline (email and phone) through which Participants and potential Participants can file complaints and concerns.

- Develop written complaint resolution procedures and oversee a complaint resolution process for consumer complaints about contractors.
- Develop and implement a remediation process to address contractor installation deficiencies.
- Develop and conduct post-project surveys to gain insights as to customer satisfaction and other metrics.
- At the CAM's request, report on customer issues and steps taken to address them.

Subtask 4.5 Project Certificates

- Provide Participants with a third-party, post M&V Project Certificate in accordance with DOE Program Rules.

Subtask 4.6 Customer opt-in website

Optional task if determined needed through discussions with and approval by CAM:

- Configure the Program website such that customers can either 1) opt-in to be contacted by a participating Aggregator and/or Contractor and/or 2) view their potential for energy savings and applicability to the P4P Program and/or 3) be sent a list of participating Aggregators and Contractors in their geographic area.

Task 5. Data Applications, Management, Integration and Reporting

Subtask 5.1 Ability to Receive Rebate Applications

- Develop or maintain the technological capability to receive rebate applications and perform project eligibility checks.
- Provide user-friendly processes for Eligible Rebate Recipients to submit applications, such as access, instructions, and assistance in multiple languages and flexibility as to the timing and stage of when Eligible Rebate Recipients submit all of the DOE and CEC required data and documentation.
- Establish a secure portal for customers to upload proof of income eligibility (for low-income customers wanting to access higher rebate values) that protects their PII and provides access, instructions, and assistance in multiple languages.

Subtask 5.2 Tool/Application for Contractors

- Provide a “kitchen table tool” for Contractors to utilize while onsite at a potential Participant’s home enabling the Contractor to:
 - Collect and enter DOE required datapoints and program data as directed by CAM

- Estimate HOMES P4P rebate value

Subtask 5.3 Additional Features for Rebate Application Process

Optional tasks if need is determined through discussions with and approval by the CAM:

- Develop or maintain ability to receive rebate applications from Aggregators; directly from Contractors serving as their own Aggregator and from Super-Aggregators, which may be CCAs or other program administrators, enrolling portfolios of projects
- Provide the ability for Aggregators to submit applications in batch form, with data specifications that align with their existing data collection and business processes.
- Provide a portal compliant with special terms and conditions for confidential information, for customers to upload utility bills (for customers who must provide utility bills as described above under “Utility Data Access”).

Subtask 5.4 Data Management

- Build or maintain the capacity to collect, store, organize and format DOE and CEC-required project data and Aggregator savings estimates including, but not limited to:
 - Energy savings information, in accordance with DOE’s *IRA Home Energy Rebates: Data & Tools Requirements Guide*
 - DOE-required xml files
 - Programmatic Data and Administrative Activities in accordance with DOE’s *IRA Home Energy Rebates: Data & Tools Requirements Guide*.
- Build or maintain the capacity to incorporate post project M&V data into project records.
- Retain all transaction data required for retention by DOE as described in DOE Program Rules, including geotagged photos and proof of combustion safety testing.
- Internal data management capacity must support all the reporting functions in Tasks 9.

Subtask 5.5 Project Reporting to CEC

- Report transaction (project) and program data regularly to a CEC central database, eventually by API. Final data points and data upload cadence will be determined with the CAM.
- In addition to data points required by DOE Program Rules, examples of potential transaction (project) data for reporting to CEC include but are not limited to project stage (e.g. customer accepted, project installation, project installation complete, M&V period ended, etc.); measures installed; and expected energy savings.

- In addition to data points required by DOE Program Rules, examples of potential program data for reporting to CEC include: Aggregator and Contractor activity; results of customer satisfaction surveys; and QA/QC results

Provide additional metrics and data to CEC upon request.

Subtask 5.6 Project Reporting to DOE

- Report Rebate Transaction Data to DOE, in accordance with DOE Program Rules.
- (Unless following Subtask 5.5 instead,) report data using PNNL's 50121 Reporting Spreadsheet, or the successor equivalent, configured to DOE's specifications.
- Upon DOE or CAM request, report additional retained data points or provide project documentation.

Subtask 5.7 API Integration with DOE systems

Optional task if need is determined through discussions with CAM and approved:

- Develop, implement and maintain secure API connection to DOE's PNNL or successor systems for one or more of the following purposes: obtaining unique address IDs, duplication checks (whether address received a previous HOMES or HEEHRA rebate), rebate reservations, utilize the Quality Installation Tool, ENERGY STAR® equipment verification, and DOE-required reporting.

Subtask 5.8 Local Program Single Point of Entry

Optional task if need is determined through discussions with the CAM and approved:

- Explore the need for, and merits of, modifying or enhancing the capacity to receive rebate applications such that Aggregators wanting to enroll a project in both a local Market Access Program and HOMES are able to submit a single application to the SWI to enroll their project in both programs.
- With CAM approval, develop such mechanism.

Task 6. Process Rebate Applications and Payments

Subtask 6.1 Receive and process rebate applications

- Receive applications to secure rebate reservation from Aggregators, and, potentially, depending on Subtask 5.3, directly from Contractors serving as their own Aggregator and from program administrators like CCAs acting as "Super Aggregators".
- In a timely manner as determined by the CAM, conduct pre and post installation rebate eligibility checks related to both DOE Program Rules and CEC-developed rules, including, but not limited to:

- Requirements for: home assessments including disclosure of energy savings and utility bill impact estimates, projects and measures, low-income verification when applicable, allowable costs, total subsidy funding versus project cost, tenant protections, financing cooling off-periods, project documentation, and participant agreements.
- Compliance with QA/QC standards developed as part of Task 4.3 including checks for equipment eligibility, CAS/CAZ testing compliance, permit closure.
- Confirming through PNNL API or another CAM-approved method, that address has not received another HOMES rebate nor a HEEHRA rebate within the last 12 months that would be disqualifying.
- Reasonableness check of Aggregator energy savings.

Subtask 6.2 Rebate reservations

- Utilize the PNNL or successor system, or a CAM-approved alternative method, to request and/or document a rebate reservation.
- Issue rebate coupons and/or confirmation of reservation to Aggregators and building owners in a timely manner, as determined by the CAM.

Subtask 6.3 Issue Final Rebate Payments

- Issue final Rebate Reimbursements in a timely manner, to Aggregators, and to Contractors where applicable, consistent with DOE timeframes for payment, after the completion of M&V.

Subtask 6.4 Pay DAC Incentives

Optional task depending on DOE Guidance updates:

- Issue \$200 payments to Contractors for projects completed in Disadvantaged Communities per DOE Program Rules

Task 7. Data Analysis and M&V

Subtask 7.1 Identify high-impact projects

- Utilize available data to screen and identify potentially high-impact geographies and projects. Work with the CAM to determine criteria for screening. Data may include the CEC's IMD Snowflake warehouse, home vintage data, or other data sets that identify grid constrained areas such as utility feeder data.
- Work with the CAM to figure out the appropriate balance of helping Aggregators identify high impact-projects, but safeguarding customer privacy and preventing unwanted customer harassment from Aggregators and Contractors.

Subtask 7.2 Project M&V

- Using a DOE-approved open-source advanced M&V software, conduct project M&V, using twelve (12) months of pre-and post- installation energy data to determine individual project savings, and aggregator portfolio savings.
 - Verify if portfolio savings reach the required 15 percent energy savings threshold.
 - Account for both gas and electric usage including when customers are served by separate gas and electric utilities. The SWI will need to identify and link customers' gas and electric utility accounts using a combination of addresses and/or account/meter numbers and subsequently provide the linked account information back to the CEC.
 - Develop or implement protocols consistent with the open-source advanced M&V software to support inclusion of customers who 1) have not been in their homes for a full 12 months, 2) have installed, or plan to install, solar PV or at-home EV charging systems.
 - For customers whose utilities are not covered by Section 1353 regulations, perform M&V utilizing monthly billing data provided from the customer's utility or directly from the customer.
- Educate and provide CEC staff with access to the system for M&V calculations to facilitate oversight.

Subtask 7.3 Coordinate M&V results with Aggregators

- When access to data is available, conduct mid-cycle M&V calculations to provide Aggregators with updates on project performance.
- Following the twelve (12) month post-installation M&V period, update Aggregator on final savings, and record Aggregator's assignment of projects to a portfolio.

Subtask 7.4 Calculate Rebate Values

- Calculate final incentive value using CAM-approved incentive formula (which may include valuing time of savings and/or location of savings).

Subtask 7.5 Data sufficiency checks

Optional Task if need is determined through discussion with CAM:

- Upon receipt of Aggregator or Contractor submission of projects for rebate reservations, conduct data sufficiency checks to determine if the site will require engineering adjustments to create a baseline.

Subtask 7.6 Additional M&V Process Development

Optional Task if need is determined through discussions with CAM:

- Explore the feasibility, practicality and effectiveness, of utilizing a single M&V process, consistent with DOE Program Rules, for projects enrolled in both HOMES and a local Market Access Program.
- Implement a shared M&V process with local Market Access program administrators.
- Explore the feasibility, practicality and effectiveness of developing an M&V approach, consistent with DOE-approved software to include customers utilizing alternative heating fuels (e.g. propane, woodstoves).
- Implement an M&V process for alternative fuels and extend program eligibility to customers utilizing those fuels.

Task 8. Compliance and Compliance Reporting

Subtask 8.1 Support CEC with Compliance Reporting to DOE

As needed and as requested by the CAM:

- Provide information needed by the CEC to support compliance reporting such as expenditures, etc.
- Provide data required by CEC to comply with all reporting outlined in the Federal Assistance Reporting Checklist (FARC).
- Assist CEC in responding to DOE, DOE's Inspector General, California State Auditor, or other entity.
- Assist CEC in responding to ad hoc requests or updated DOE guidance for requirements not currently included in the Federal Assistance Reporting Checklist (FARC).

Subtask 8.2 Corrective Action

- In consultation with the CAM, take timely, corrective action if SWI becomes aware of:
 - potentially questionable or fraudulent activity on the part of Aggregators, Contractors or Participants.
 - violations of DOE Program Rules for tenant protections on the part of landlords who have received HOMES rebates