

DOCKETED	
Docket Number:	23-DECARB-01
Project Title:	Inflation Reduction Act Residential Energy Rebate Programs
TN #:	265700
Document Title:	HOMES P4P Solicitation Concept Workshop Supplemental Q&A
Description:	Supplemental questions and answers for the Solicitation Concept Workshop for Home Efficiency Rebates (HOMES) Pay-for-Performance Program held on August 8th 2025.
Filer:	Brennan McCoy
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	8/19/2025 3:41:11 PM
Docketed Date:	8/19/2025

HOMES Pay for Performance (P4P) Solicitation Concept Workshop

Supplemental Questions and Answers – August 19, 2025

Q1: Will IBank or GoGreen Financing provide rebate financing to aggregators?

Answer: The CEC helps fund the GoGreen Home Energy Financing Program (“GoGreen Home”) as part of CEC’s Equitable Building Decarbonization programs. GoGreen Home’s current model provides financing to homeowners. CEC expects that many homeowners participating in the HOMES P4P Program may finance the portion of their projects that is not covered by rebates and may access financing through GoGreen Home. However, GoGreen Home does not currently provide bridge loans to Aggregators. At this time, CEC is not aware if funding from the California Infrastructure and Economic Development Bank (IBank) is available. CEC encourages public comment on this topic as part of the Input Request. Please see Section A. General.

Q2: Are Rebate Delivery Funds available to pay aggregators for allowable costs?

Answer: CEC’s HOMES application as approved by DOE does not contemplate using Rebate Delivery Funds to pay aggregators. It does contemplate the Statewide Implementer (SWI) using Rebate Delivery Funds for the \$200 DAC Incentives to contractors (installers), where required.

Q3: Is the entirety of the \$16.5M administrative budget anticipated to be awarded to a single SWI?

Answer: CEC is anticipating a single SWI. CEC expects the SWI may bring on subcontractors to help implement the program.

Q4: Are all actors in this program—SWI, Aggregators, and Contractors—allowed to make any profit? Is there a limit on how much profit can be made?

Answer: To answer this question, it’s important to differentiate between “contractors” who are hired by homeowners to install energy upgrade projects and “subcontractors” who are hired by the SWI to help implement the program. Please see the Workshop Notice for definitions of these terms.

The Statewide Implementer and its subcontractors, regardless of whether the solicitation is structured as a Grant Funding Opportunity or a Request for Proposal, will be paid from HOMES Program Administrative Funds.

For a **grant agreement**, the prime recipient cannot be reimbursed for more than their actual allowable costs and cannot be reimbursed for profit, fees or markups. Generally, subcontractors, which are entities that provide goods or services under the prime recipient, may

be eligible to claim profit, but are limited to no more than ten percent profit on services provided to the program.

For a **contract**, generally, both the prime contractor and the prime's subcontractors may claim no more than ten percent profit on services provided to the program.

Aggregators and energy contractors, installers who complete the actual project installations, are not a party to the CEC's agreement with the SWI, whether that agreement is a grant or a contract. They are not paid with HOMES Program Administrative Funds. These entities are competing in the marketplace. While the CEC is not proposing to impose specific restrictions on the profit margins of Aggregators or energy contractors completing installations, they will be subject to a Participation Agreement with the SWI. CEC encourages public comment on best practices as to how the SWI should implement oversight of energy contractor costs for consumers.

Q5: Is there a difference between the CEC's Special Terms for Confidential Information for a GFO and the CEC's Special Terms and Conditions for Confidential and Personal Information under an RFP?

Answer: No. The terms regarding Confidential and Personal data will be the same, for this Implementer, regardless of solicitation vehicle chosen. CEC will incorporate special terms when a Recipient or Contractor is required to handle Confidential and/or Personal information to fulfill agreement project or tasks.

Q6: Is there a difference in what the Statewide Implementer's access to the CEC's data infrastructure (Interval Meter Data and Billing Data) would be, depending on if the award was structured as a Recipient and Contractor?

Answer: Generally, the form of the agreement with the SWI will not matter. CEC will incorporate required privacy, security, and data access terms into either a grant or into a contract.

Q7: Why is the CEC choosing to pursue this as a GFO instead of an RFP?

Answer: CEC encourages public comment on this topic as part of the Input Request. Please see Section B. Agreement Structure.

Q8: Are aggregators expected to directly interact with and serve homeowners? Or are homeowners expected to interact only with contractors, with aggregators serving only those same contractors?

Answer: CEC recognizes that business models across Aggregators will vary. CEC encourages public comment on this topic as part of the current Input Request. Please see Section C. Roles and Responsibilities.

Q9: “Contractors do need to supply customers with a bill impact estimate”—please confirm that is a contractor responsibility, not an aggregator responsibility.

Answer: Department of Energy’s Program Requirements & Application Instructions states that the “[H]ome assessor must collect and/or produce[...] Written acknowledgement from the consumer of the proposed project’s estimated impact on household energy costs and consumption including estimate of the energy savings in dollars in year one based on current utility rates at the home.” As stated in the Solicitation Concept Paper, Aggregators help Contractors estimate energy savings at the project level while it is the Contractor’s responsibility to share energy and bill impacts with household participants. For example, Aggregators may provide Contractors with tools to estimate energy and bill impacts during a home assessment. The CEC is considering allowing applicants for SWI to propose how they will implement the requirement that potential households be provided with a bill impact estimate in an efficient and pragmatic manner that protects consumers. Please also see the Input Request, Section C. Roles and Responsibilities.

Q10: Can the implementer combine funds from other programs (e.g., market access programs) for incentives to aggregators/customers?

Answer: Stacking or layering with other programs is encouraged. CEC encourages public comment on this topic and how it can be facilitated as part of the Input Request. Please see Section E. Program Integration.

Q11: How can the homeowners trust they will benefit when contractors and/or aggregators are pocketing the rebates, and still charging the same or higher prices to homeowners that they charge without the IRA program?

Answer: CEC expects program communications from the SWI to encourage customers to conduct typical consumer due diligence when selecting a contractor including activities such as seeking bids from multiple companies, checking reviews and obtaining referrals. CEC encourages public comment on best practices regarding consumer protection and cost containment.

Q12: If there is a difference between the estimated savings and actual savings, how will low-income homeowners be protected against unaffordable utility expenses?

Answer: CEC encourages public comment on this topic.

Q13: Will the projects be fully covered by grant funding for low-income populations or is it anticipated that there may need to be homeowner contributions?

Answer: CEC's program as approved by DOE follows the default guidance which limits HOMES funding to cover 80% of project costs for Low Income households. (Note that the rebate value is passed to the household at the time of installation based on expected savings. Final rebate payments to Aggregators depend on actual savings, measured at the meter.) A combination of homeowner contributions and/or stacking and layering with other incentive programs or personal funds will likely be needed to cover the full cost of projects.