

**DOCKETED**

<b>Docket Number:</b>	23-DECARB-01
<b>Project Title:</b>	Inflation Reduction Act Residential Energy Rebate Programs
<b>TN #:</b>	265801
<b>Document Title:</b>	Resource Innovations Comments - Suggestions to Improve Market Receptivity to the Planned HOMES Program
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Resource Innovations
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	8/27/2025 7:58:50 PM
<b>Docketed Date:</b>	8/28/2025

*Comment Received From: Resource Innovations*

*Submitted On: 8/27/2025*

*Docket Number: 23-DECARB-01*

## **Suggestions to Improve Market Receptivity to the Planned HOMES Program**

Resource Innovations appreciates the CEC providing the opportunity to comment on considerations related to your upcoming HOMES Program. We would like to offer the following pieces of input which we believe are critical to making the Program a success. We hope that these are helpful at the Commission considers the optimal path forward.

1) We believe the “Modeled” pathway would achieve higher customer uptake while resulting in lower net project costs to customers for reasons previously stated in other dockets (namely, the project cost certainty it provides for customers and contractors, the streamlined manner in which it could be implemented, and the lack of a need for an “aggregator” role which further dilutes incentives that would otherwise flow to contractors and customers). However, if a “Performance” pathway is required by the CEC, we recommend that the portion of rebate reimbursement dollars available to aggregators and installation contractors be minimized to allow the rebates to lower the participants share of the project cost. Higher portions of the rebates for aggregators and installation contractors may need to be allowed during the first months of program implementation in order to encourage contractor participation and customer uptake but these should then be ramped down as Aggregators and contractors become more operationally efficient.

2) The profitability limits imposed by the GFO framework (0% for prime applicants and 10% for sub-applicants) and by the CEC’s typical RFP regulations (10%) is generally unworkable for Resource Innovations and our program implementation peers and partners. These caps would be detrimental to our firm’s financial health, and as much as we would like to support your important program, this barrier in itself is significant enough to cause us to pass on the opportunity.

Thank you again for your consideration.