

**DOCKETED**

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*Comment Received From: Emily Kemper  
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**CLEAResult's Public Comments on HOMES P4P Solicitation  
Concept**

*Additional submitted attachment is included below.*



## MEMORANDUM

To: California Energy Commission

From: CLEAResult

Date: August 28, 2025

Subject: Public Comments on HOMES P4P Solicitation Concept

CLEAResult appreciates the opportunity to provide comments on the HOMES Pay-for-Performance (P4P) Solicitation Concept. As a leading implementer of energy efficiency programs, we are committed to supporting equitable and effective decarbonization strategies across California. Our comments aim to enhance program design and implementation to ensure broad participation and successful outcomes.

**Load Flexibility and Grid Resiliency Matter:** CLEAResult recommends that the HOMES P4P program explicitly incorporate load flexibility and resiliency goals into its design. As California faces increasing grid stress and climate-related disruptions, empowering homeowners with technologies and incentives that support demand response, peak load reduction, and backup power will be essential. We encourage the CEC to explore mechanisms for layering HOMES rebates with programs that promote smart controls, battery storage, and other resiliency-enhancing measures.

**Financing and Aggregator Support:** We support exploration of bridge financing options for Aggregators, including partnerships with TBL Fund, IBank and expansion of GoGreen Home. Ensuring equitable access to financing is critical for enabling participation from smaller and community-based Aggregators.

**Use of Rebate Delivery Funds:** We recommend the CEC reconsider the use of Rebate Delivery Funds to support Aggregator operations, particularly in underserved areas, where business models may vary.

**Solicitation Structure and Profit Limits:** With the pioneering approach sought in this solicitation, we urge the CEC to allow as much flexibility as possible in proposed program designs. This includes placing fewer, not more, restrictions on profits. We also support a performance metric-based smaller scale roll-out in targeted areas, such as in ALICE communities, before full statewide implementation, to ensure smooth and successful collaboration amongst all the program stakeholders.

**Equity, Affordability, and Incentive Stacking:** At the project level, the potential to fall short of savings goals is real; therefore, protecting low-income homeowners against unaffordable utility expenses will be critical. We strongly support incentive stacking and recommend streamlined processes and a centralized resource for combining HOMES with other programs.

In conclusion, CLEAResult appreciates the opportunity to contribute to the development of the HOMES P4P program. We look forward to continued collaboration with the CEC and stakeholders to advance California's decarbonization goals. Please feel free to contact us for further discussion or clarification.

Sincerely,

Kecia Davison

Senior Vice President, West Client Delivery

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