

**DOCKETED**

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**A O Smith Comments to RFI on Contractor Training for IRA Rebate Programs**

*Additional submitted attachment is included below.*



August 28, 2023

California Energy Commission  
Docket No. 23-ERDD-05  
715 P Street  
Sacramento, California 95814

**RE: A. O. SMITH CORPORATION COMMENTS TO THE CALIFORNIA ENERGY COMMISSION REQUEST FOR INFORMATION ON CONTRACTOR TRAINING FOR INFLATION REDUCTION ACT FOR RESIDENTIAL ENERGY REBATE PROGRAMS**

Dear California Energy Commission Staff:

A. O. Smith appreciates the opportunity to provide feedback to the California Energy Commission (CEC / Commission) in response to the Request for Information (RFI) on Contractor Training for the Inflation Reduction Act (IRA) for Residential Energy Rebate Programs, issued on August 11, 2023. We extend our thanks to the CEC for actively seeking input from stakeholders as part of the process to shape training programs prior to the submission of the application for federal funding to the Department of Energy (DOE).

The Inflation Reduction Act (IRA) includes significant rebates and financial incentives for building decarbonization technologies. With California's leadership in building electrification, the state is well-poised to leverage federal funding. Yet, to ensure the optimal utilization of these funds, it becomes imperative that the contractor workforce is well-versed and trained in these technologies. Ideally, this training would include equipment manufacturers themselves, or at the very least, include input and feedback from manufacturers. It is worth acknowledging that California has been at the forefront of workforce training for these advancements, having successfully integrated training requirements into ongoing programs. Given this context, A. O. Smith strongly supports the CEC's pursuit of federal funding dedicated to workforce training.

A. O. Smith suggests that the CEC explore existing contractor training programs within California as potential candidates for additional funding, or at a minimum, as reservoirs of valuable best practices. Irrespective of the eventual allocation of resources to new or existing initiatives, we firmly believe that

the manufacturers of the technologies incentivized by the IRA should be actively engaged as pertinent stakeholders in the development of training programs targeting their technologies.

## **I. About A. O. Smith and Heat Pump Water Heaters**

A. O. Smith is a global leader applying innovative technology and energy-efficient solutions to products manufactured and marketed worldwide. A. O. Smith is the largest manufacturer and seller of residential and commercial water heating equipment, high-efficiency residential and commercial boilers, and pool heaters in North America.

Heat Pump Water Heaters (HPWH) will play a vital role in two key California policy priorities – reducing the carbon footprint of our buildings as the state transitions water heaters from primarily gas-fired to electricity and helping to manage the integration of increasing amounts of renewable energy. The IRA will be providing rebates for HPWHs and A. O. Smith believes that these rebates, combined with other available state and utility incentives, will drive significant growth of the HPWH market in California.

## **II. The CEC should collaborate with Equipment Manufacturers on Workforce Training Programs**

Manufacturers bring a wealth of expertise to the table when it comes to their products, making their insights invaluable when developing training initiatives for the workforce tasked with installing these systems. In fact, there are various collaborative approaches that can accommodate a wide array of products and manufacturers.

An example of a collaborative training program that incorporated manufacturer input is the ENERGY STAR® HPWH Manufacturer Action Council’s (ESMAC) HPWH training. ESMAC is comprised of eight of the largest HPWH manufacturers, and its training program covers a range of topics including technology features, benefits, suitable applications, energy efficiency comparisons with other water heater types, installation techniques, best practices, service support, warranty, maintenance tips, troubleshooting, and even effective selling strategies. Notably, the ESMAC program has already been integrated into existing California HPWH rebate and incentive programs. Under the TECH Clean California program, eleven ESMAC training sessions have been provided to contractors just this year.<sup>1</sup> Moreover, ESMAC's training program is being considered as an eligible option for the training requirement in the Self-Generation Incentive Program (SGIP) HPWH incentive initiative.<sup>2</sup>

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<sup>1</sup> See “Introduction to Heat Pump Water Heater Education - 2023 Online Trainings Presented by TECH Clean California & ESMAC.”

Flyer available at: <https://techcleanca.com/events/introduction-to-heat-pump-water-heater-education-6/>

<sup>2</sup> Energy Solutions Advice Letter 2-E “Submission of Self Generation Incentive Program (SGIP) Heat Pump Water Heater (HPWH) Program (the SGIP HPWH Program) Handbook and Equity Outreach Plan.” Submitted to the California Public Utilities Commission on May 16, 2023.

With these successes in mind, A. O. Smith suggests that the CEC explore the potential of supporting ESMAC trainings with this federal funding. For other training programs for HPWHs and other technologies, A. O. Smith encourages the CEC to actively collaborate with manufacturers. A. O. Smith greatly looks forward to continuing to collaborate with the CEC during the development of these programs. By doing so, funding can be directed towards the most impactful and effective training programs, ultimately fostering a more skilled and knowledgeable workforce.

### **III. Conclusion**

A. O. Smith looks forward to continuing to collaborate with the CEC and other stakeholders on the development of these training programs, and we greatly appreciate the opportunity to comment on the RFI. Please do not hesitate to contact me if you have questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua C. Greene". The signature is fluid and cursive, with a long horizontal stroke at the end.

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