

**DOCKETED**

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*Comment Received From: Nicolo DeGiorgio*  
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## **NZEO Comments - IRA HOMES**

Net Zero Energy Operators recommend the following regarding the general program design of HOMES program:

- 1) Utilization of the measured approach, with a similar framework as seen in Tri-County Regional Energy Network (3C-REN)
- 2) Leveraging existing Home Energy Rater Services (HERS) to engage in commissioning of systems funded by the pay-to-performance approach to meet requirements of Title 24 energy code. Proper system installation and commissioning provides quality assurance to maximize savings for homeowners.
- 3) Incorporating a DOE Home Energy Score rating as part of the rebate requirements for the modeled approach. This provides assurance that models were generated with appropriate as-built construction features - further validating energy savings claims.

Best Regards,  
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