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Treehouse's Comments on RFI IRA HEEHRA Phase II

Additional submitted attachment is included below.

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January 10, 2025

California Energy Commission

Re: Docket No. 23-DECARB-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

California Energy Commission Commissioners and Staff:

Treehouse appreciates the opportunity to respond to the California Energy Commission's (CEC) Request for Information (RFI) for Program Design of Inflation Reduction Act (IRA) Home Equipment and Appliance Rebates (HEEHRA) Phase II.

[Treehouse](#) is a software-enabled API-connected installation platform for electrification projects combining automated scoping and design with installation services provided by a team of expert electricians. Treehouse operates as a centralized, end-to-end partner, helping organizations – including auto retailers, fleet providers, utilities, and electrification hardware manufacturers – scale electrification programs nationwide and deliver seamless, delightful installation experiences for customers. Treehouse is a registered certified electrical contractor with [The Switch Is On](#) and able to perform electrical work for forth HEEHRA Phase I. Treehouse has extensive experience in scaling electrification programs nationwide, successfully developing a growing workforce of certified and accredited electricians to meet the increasing customer demand for eligible equipment and appliances for IRA HEEHRA Phase II funding.

Treehouse' success in scaling programs lies in serving as a unified white-labeled platform for organizations powered by APIs. APIs drive efficiency by standardizing information and establishing a single source of truth for the contractor network supporting a program. Without an API-driven approach, contractors risk adopting inconsistent methods for scoping, quoting, assessing panel capacity, and collecting and reporting on installation quality.



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At Treehouse, we see substantial benefits in managing rebates through a unified API-connected platform that also integrates contractor deployment for projects. Below, we outline our detailed recommendations.

3) Contractor Engagement and Support

Treehouse has extensive experience in scaling electrification programs nationwide, successfully developing a growing workforce of certified and accredited electricians to meet the increasing customer demand for eligible equipment and appliances for IRA HEEHRA Phase II funding. Treehouse has found that traditional electrification marketplaces hand off projects to contractors after estimation and lack standardization, often leading to inconsistencies in pricing, install quality, and customer experience. These inconsistencies also contribute to extensive site visits with cost overruns that can delay install timelines. To avoid these kinds of scenarios, we would like to share some recommendations with the CEC.

a) What are effective methods to recruit contractors to participate in the program, especially in underserved, disadvantaged, low-income, and rural communities?

1. **The CEC should minimize burden for contractors participation by tasking program administrators and community based organizations with administering income qualification.** Electrical contractors are highly skilled technicians and should be left to deliver the highest quality installation outcomes with cost certainty for income qualified customers. Customer income qualification should be handled by program administrators and community-based organizations which funnel qualified customers via an API integration to a single platform for contractors. The single platform can be administered by the CEC consisting of both contractor tools and a customer facing portion. The platform would seamlessly integrate to the necessary “PNNL [Pacific Northwest National Laboratory] and the Department of Energy (DOE) developed the Application Programming Interface (API)—also known as the DOE Rebate Tracking System and Coupon Generator—to facilitate program implementation and reduce reporting requirements.”¹ This approach ensures a consistent method of moving customers through the pipeline to installation, removing friction in both the contractor and customer experience.

¹ [PNNL Home Energy Rebate Tools](#)

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2. **The CEC should provide contractors with end-to-end project ownership on a single platform.** A single platform streamlines the install process by consolidating quoting, scoping and permitting work for income qualified customers all in one place for all registered contractors of the CEC's IRA HEEHRA Phase II program. This approach removes friction for both contractors and end-customers, ultimately allowing for the delivery of upfront and transparent pricing per project and compliant, high-quality, and safe installation experiences for both contractors and customers. The platform should integrate via API [PNNL's Quality Install Tool](#) to ensure the collection quality installation information and reporting in a standardized fashion.
3. **A single set of tools for contractors to ensure efficient use of funds.** A unified platform ensures transparency in project costs, promoting consistency and reducing the risk of contractors overcharging, ultimately resulting in an efficient use of the IRA HEEHRA funds.

b) What type of training should the CEC offer to help installation contractors understand program requirements and streamline rebate processing for retailers, contractors, and homeowners?

In order to scale the contractor workforce and maximize installation opportunities with cost certainty, Treehouse recommends equipping contractors with tools (described below) on a single platform with API integrations. This will create efficiencies across the value chain of delivery of the IRA HEEHRA Phase II program.

- **The CEC should make contractors aware of tools to streamline electrical panel assessments.** Automated electrical panel analysis to assess a panel's safety and capacity without site visits can significantly reduce project timelines and cost of project delivery.
- **The CEC should provide or make contractors aware of tools to accelerate multi-equipment installations and reduce operational overheads.** With multiple installation opportunities at a single income-qualified household, qualified registered electrical contractors can scope, quote, access and apply for permits and rebates on a single platform.

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- **The CEC should recognize that leveraging a single platform reduces operational overhead and maximizes control for retailers and contractors.** A set of automation controls – including job pricing via API, instant job approvals and customizable approval thresholds, and installation scheduling triggered based on equipment delivery – and the management of hardware storage and fulfillment can significantly reduce operational overhead, while maximizing ease and control for retailers with the status of each project delivered straight into their systems of record.

Treehouse appreciates the opportunity to comment on Docket #: 23-DECARB-01 and looks forward to working with the CEC and program administrators to support qualified registered contractors throughout the implementation of the IRA HEEHRA Phase II program. Please feel free to contact us with any additional questions.

Sincerely,

Alex David

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