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## Measured savings pathway needs to consider off-grid homes without utility meters

Although the vast majority of homes in California are connected to the electric grid, many thousands of homes are fully off-grid. In remote parts of the state, entire communities are off-grid. Because these homes are not connected to utility meters, they typically have no records or data for home energy consumption which could be used in the proposed measured savings pathway calculations. This would seem to virtually eliminate off-grid home residents from accessing energy efficiency rebates. Often, offgrid homes are less energy efficient than grid-connected homes and rely on a mix of energy sources that include not only renewable sources such as on-site solar but also inefficient sources such as diesel or gas generators, oil-burning heaters, and even propane lighting. The HOMES program needs to fully consider off-grid homes and provide a means for them to qualify for rebates even if there is no past energy consumption data available.