

DOCKETED

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Whirlpool Corporation - Proposed Recommendations and Best Practices

Additional submitted attachment is included below.



January 18, 2024

California Energy Commission Docket Unit
MS-4
715 P Street
Sacramento, CA 95814

RE: Docket No. 23-DECARB-01

Dear California Energy Commission,

On behalf of Whirlpool Corporation, we appreciate the opportunity to comment on the commission's approach to program design and application for receiving \$292 million from the Department of Energy for the **Inflation Reduction Act Residential Energy Rebate Programs**. Specifically, we offer our recommendations to establish a rebate reimbursement process and prioritize bulk purchasing which can significantly impact manufacturers' and retailers' ability to meet consumer demand and improve energy efficiency across California households. Finally, we address best practices for integrating existing programs for Home Energy Rebates.

Whirlpool Corporation is committed to being the best global kitchen and laundry company, in constant pursuit of improving life at home. We look forward to the opportunity to offer eligible appliances to the marketplace to help the state achieve its goals of reducing costs to consumers while improving household energy efficiency. In California, Whirlpool operates two major distribution centers in Perris and Stockton and has approximately 500 full-time and contract employees statewide.

Proposed Recommendations for Successful Program Implementation

While there is much excitement in establishing and rolling out Home Energy Rebates, extensive thought and consideration must be given to streamlining the reimbursement process for retailers, home builders, and contractors of all sizes. The commission should establish the rebate reimbursement process before launching and making Home Energy rebates available to consumers.

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The reimbursement process for the Home Energy Rebates should also be quick and simple. Specifically, the commission should establish a centralized page (made available in digital and print) for participating contractors and retailers that includes clear requirements for acceptable reimbursements, minimal guidelines and steps for submitting reimbursements, and an expected timeline for receiving reimbursements.

It is worth noting that the timeline for submitting a request and receiving rebate reimbursements is prompt. For example, any proposals that establish a timeline for receiving reimbursements longer than at least 15 days will have a significant impact on retailers, homebuilders, and contractors.

Failure to build a streamlined reimbursement process will further impact small and independent contractors, dealers, and retailers. Each operates within urban and rural areas and will remain a key partner in reaching and helping consumers make home efficiency upgrades.

As the commission navigates the design and implementation phase, we offer the following recommendations for rebate reimbursements:

- Streamline rebate reimbursements by collecting participating retailers, homebuilders, and contractors' information during the consumer income verification process.
- Ensure reimbursements can be reviewed, processed, and delivered within at least a week after a consumer applies their rebate during the point of sale.
- Further define the costs (product price, delivery and installation fees, and or taxes) that rebates will cover for eligible households.

The California Energy Commission should examine options for bulk purchasing and home builder programs to achieve its program goals and ensure funding is allocated. Bulk purchasing is cost-effective and simplifies the process for customers and organizations to purchase eligible products or perform relevant home upgrades. Additionally, bulk purchasing and contract purchases can optimize income verification processes and reimbursements, and reduce waste. Through its direct-to-consumer programs, Whirlpool Corporation has significant capabilities within California to deliver and install appliances and take back old ones.

Share any best practices for braiding federal and state funds for highly effective rebate, incentive, and/or direct install programs aimed at households in disadvantaged communities or meeting low-income guidelines.

Providing consumers and businesses with clear and consistent information regarding eligibility is paramount. Specifically, the Commission should establish a central platform (such as “California Home Energy Rebates”) that lists information regarding eligibility (who is eligible, how one can provide proof of eligibility, and options for businesses to verify eligibility) and appropriate points of contact designated as rebate program support staff prepared to address specific questions or concerns.

Additionally, the Commission should eliminate any inconsistencies within public information involving eligibility between any existing state programs that are integrated within California’s Home Energy Rebate programs. This includes ensuring consumers have clear information on whether they can receive one of the Home Energy Rebates if they are already eligible for an existing state program such as the Equitable Building Decarbonization Direct Install Program.

Second, the Commission should establish interagency coordination with key decision-makers and relevant staff to avoid potential regulatory bottlenecks that can restrict successful integration. Coordination amongst departments is important for addressing some of the following scenarios:

- The determination of consumer rebate vouchers and coupons for the Home Efficiency Rebate (HER) and Home Electrification and Appliance Rebate (HEAR) programs.
- Allocation and distribution of reimbursements to retailers and contractors.
- Verification of eligibility requirements (income, building type, or proof of enrollment in state program).

The Commission may consider working with other states to navigate the design and implementation of Home Energy Rebates to harmonize requirements and processes while creating a roadmap with best practices for managing programs. Doing so will help implementers, contractors, home builders, and retailers better manage consumer demand.

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Third, the Commission should consider increasing the consumer rebate threshold when braiding any federal and state funds. Increasing the consumer rebate, especially for low-income households, can help close financial gaps that will still be very high for certain products and delivery and installation services.

Braiding funding options among existing and new rebate programs also raises concerns surrounding consumer choice of eligible rebate products. The commission should avoid adding additional limitations on products currently eligible for a Home Energy rebate. This includes restricting consumers' ability to apply a rebate to any of the available product offerings for cooking such as radiant electric¹(smooth surface and coil) cooktops and ranges. Such ranges are widely available, comparable in energy efficiency, and provide a range of affordable options for consumers.

Adding additional guidelines to rebate programs such as the Home Electrification & Appliance Rebate, by requiring one product type over others available in the marketplace, counters the goals of reducing costs to consumers and encouraging broad adoption of ENERGY STAR-qualified appliances.

Thank you for your consideration. Should you have any questions regarding our comments, please let us know.

Sincerely,

Anthony Price

Manager, Government Relations

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¹ Environmental Protection Agency, Energy Star. *Residential Electric Cooking Products - Energy Star Version 1.0 Residential Electric Cooking Product Specification - Final Data Analysis Package.*
https://www.energystar.gov/products/residential_electric_cooking_products_version_1