

**DOCKETED**

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*Comment Received From: Derapi, Inc.  
Submitted On: 1/26/2024  
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**Derapi - Comments on HOMES program RFI**

*Additional submitted attachment is included below.*



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January 26, 2024

Commissioner J. Andrew McAllister  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 23-DECARB-01: Response to RFI on the Inflation Reduction Act Home Energy Rebates**

Dear Commissioner McAllister:

On behalf of Derapi, Inc., I am responding to the California Energy Commission's (CEC) Request for Information (RFI) on the Inflation Reduction Act (IRA) Home Efficiency Rebates Program (HOMES).

Derapi ([www.derapi.com](http://www.derapi.com)) is a California-headquartered startup that provides software data infrastructure services to the Distributed Energy industry, including solar and battery storage installers, demand flexibility providers and energy management firms. Our software application programming interface (API) streamlines communication with behind-the-meter (BTM) distributed energy resources (DER) such as solar inverters, battery storage systems, and other smart energy devices. Our goal is to accelerate electrification and decarbonization by enabling energy consumers to unlock the full value of their investments through the use of data and communication technologies.

We believe that the measured pathway of the HOMES program is the best solution for California to maximize benefits to low-income Californians and ensure the most cost-effective reductions in emissions and energy bills by rewarding actual, rather than modeled or theoretical, reductions in energy use. The measured approach also enables a comprehensive approach to home energy by enabling and encouraging retrofit providers to use actual energy measurements to coordinate the design of multiple energy improvements, such as combining efficiency with electrification and home solar and battery storage.

Stacking and leveraging incentives accelerates California's decarbonization and electrification goals by enabling the deployment of multiple energy improvements in a single outreach effort to a given household. Furthermore, using a measured approach that combines whole-home meter data with device data enables these improvements to be deployed in rapid succession, or even simultaneously, as part of a comprehensive home energy improvement plan. This is particularly important for low-income households, where homes may need multiple improvements, or where combining efficiency and/or electrification improvements with behind-

the-meter generation such as solar and battery storage can maximize energy bill savings for the household.

This device data is readily available due to the incorporation of digital technologies in many modern household energy devices, such as smart thermostats, connected water heaters and HVAC, internet-enabled solar inverters and home batteries, and other devices. Many manufacturers make this data available to entities authorized by their customers. By using this data with the household's permission, home energy retrofit providers have a detailed understanding of a home's energy use and the effect of any prior energy improvements, which in turn can inform the selection and design of future improvements. Additionally, ongoing monitoring of this data enables providers to ensure any equipment installed as part of the retrofit continues to operate properly and deliver ongoing benefits to the household.

Derapi recognizes that stacking and leveraging incentives can be achieved using modeled approaches. However, only the measured approach incentivizes retrofit providers to take into account individual households' specific needs and deploy the most cost-effective solutions that meet California's electrification and decarbonization goals.

We encourage the Commission to adopt the measured approach for California's IRA HOMES program. Thank you for your work on this important program and for the opportunity to provide comment. We look forward to working with the Commission and other stakeholders to ensure its success.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas Lee', with a long horizontal flourish extending to the right.

Thomas Lee  
Founder & President  
Derapi, Inc.