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UtilityAPI Comments CEC HOMES Program RFI

Additional submitted attachment is included below.



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UtilityAPI Comments to the
California Energy Commission
Docket No. 23-DECARB-01

RE: Request for Information to inform the California Energy Commission's Application to the United States Department of Energy for the federal Home Efficiency Rebates Program

UtilityAPI appreciates the California Energy Commission (CEC or Commission) for providing this forum to provide feedback on this important topic. The Inflation Reduction Act (IRA) presents a monumental opportunity to accelerate the achievement of California's building decarbonization goals, while equitably creating greater energy efficiency, independence, and resilience. The CEC and its stakeholders are uniquely positioned to demonstrate leadership by implementing a program that creates true market transformation for the state.

UtilityAPI was founded in California in 2014 to help streamline the deployment of distributed energy resources and connect disparate parties dealing with complex requirements of doing so. We do this by meeting the data access needs of some of the largest energy services and cleantech providers in the country and providing utilities, community choice aggregators, and state energy offices with secure data access platforms that meet these vendors' needs. UtilityAPI helped develop and bring to market the Green Button Connect My Data standard and is currently the world's largest provider of Green Button Alliance-certified data access platforms.

We have first-hand experience working with the challenges California faces in creating an equitable, distributed, resilient, and decarbonized economy. We also understand the tremendous opportunity to transform the market, using common tools to streamline and accelerate deployment. Critical to transforming these markets is ensuring that a common set of best-in-class tools are deployed statewide that connect households, program administrators, contractors, and load serving entities in a secure and standardized manner.

We encourage the CEC to take a platform approach to deploying the HOMES program, leveraging best-in-class tools to consolidate program functions and allow for a more seamless braiding of program funds within California's diverse ecosystem of existing programs. Further, the CEC should focus its investment in common functions that resolve challenges to that ecosystem, such as secure access to customer utility data while simultaneously meeting related requirements, such as the implementation of the Load Management Standards.

The goals of the Department of Energy (DOE) and the CEC are aligned: California, and the nation, are entering a stage where a market transformation approach will be critical to ensuring rapid and sustained success. This means reshaping and rethinking the traditional energy program paradigm to ensure value flows to customers in a streamlined fashion. The CEC has the tools, resources, and forum to make that happen. We are hopeful that the Commission takes this opportunity to capitalize on the unique moment it finds itself in.

Best regards,

Josh Keeling
SVP, Product and Market Development
UtilityAPI

- 1. Braiding HOMES with Equitable Building Decarbonization Direct Install Program.** *Assembly Bill (AB) 209 (Chapter 251, Statutes of 2022) directs the CEC to develop and implement the Equitable Building Decarbonization Program which includes a direct install component. The CEC subsequently allocated \$690 million to the EBD Direct Install Program and adopted Direct Install Program Guidelines in October 2023 with goals of reducing GHG emissions and advancing energy equity. The EBD Direct Install Program will serve low-income residents with energy decarbonization packages installed at no-cost. Packages will, at a minimum, include a heat pump for space or water heating and may also include induction ranges and electric clothes dryers, air sealing, insulation, solar window film, LED lighting, air filtration, electrical wiring and panel upgrades, and remediation and safety measures. Additionally, all households served must be located in an under-resourced community.*

Braiding HOMES funding with the EBD Direct Install Program would support building decarbonization for additional low-income residents while streamlining implementation and minimizing administrative costs by utilizing the same set of administrators and regional infrastructure. In the braiding scenario, CEC would seek approval from DOE to cover 100 percent of project costs for low-income households in alignment with the EBD Direct Install Program. The HOMES requirement for portfolios of projects to realize certain thresholds of energy savings would only apply to federally funded projects.

The successful braiding of programs and funding relies on the consolidation and standardization of disparate processes, education materials, data sources, and verification mechanisms. When executed properly, this can be an incredibly powerful program strategy for maximizing the impacts of various funding sources, while streamlining and simplifying the experience for program participants.

As an example, how Weatherization Assistance Program (WAP) funds are delivered today are an imperfect example of braiding today. There, states deliver formula funds that are bundled with state, local, and utility funds to deliver weatherization programs through local community action agencies. The success of this model is the extent to which it provides simplified, formula funds in a consistent manner that can be integrated into a process delivered by organizations connected to the communities and local trades.

However, this model is flawed in that it leaves much of the required program infrastructure in the hands of those agencies. It also pushes the burden of eligibility determination, incentive calculation, reporting, and verification to often underfunded nonprofits that apply these approaches inconsistently with the resources at their disposal.

While we are open to the CEC taking a braided approach, we encourage the Commission to initially focus any braiding efforts on programs it has implementation authority over. This list includes but is not limited to the:

- Equitable Building Decarbonization Program (EBD) already identified within this RFI;
- Demand-Side Grid Support (DSGS) program,
- Distributed Electricity Backup Assets (DEBA) program, and
- Community Energy Resilience Investment (CERI) program.

Taking a comprehensive approach to braiding funds will improve the overall experience, and ensure more efficient deployment of building electrification technologies along with important complementary technologies such as load flexibility, storage, and onsite generation. At a time when the distribution and wholesale systems in California¹ are increasingly constrained, the integrated deployment of distributed energy resources in all state programs is critical².

2. *In the situation where CEC does not incorporate/braid HOMES program funding into the EBD Direct Install Program, respond to the following questions to inform CEC's HOMES program design and application to DOE.*
 - a. *Overall program design:*
 - i. *How can HOMES funds that are awarded to deliver residential whole building energy efficiency retrofits, be best utilized to support the state's decarbonization and electrification goals?*

Developing a common platform

In order to transform the market for building decarbonization most effectively utilizing the HOMES program funds, we recommend that the CEC incorporate a broad set of program resources into a “common platform” that can reduce the burden and complexity put onto households and the businesses that serve them. Common platforms can serve as clearinghouses for households and contractors to get information on their options, determine eligibility, select a set of options, enroll in programs, deploy measures, process incentives, and share necessary data to model/measure/validate their performance. Low-income homes, in particular, face enough demands on their time and resources; energy programs should help reduce that burden, not aggravate it.

¹ Kevala, “Electrification Impacts Study Part 1: Bottom-Up Load Forecasting and System-Level Electrification Impacts Cost Estimates”, <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K423/508423247.PDF>

² There are many examples in comments provided in this docket alone, as seen from as disparate stakeholders as Ohmconnect (pointing to the interactions between DR and decarbonization) and the North American Insulation Manufacturers (noting the synergy between efficiency and electrification). This also aligns with the approach outlined by the CPUC in its latest DER Action Plan.

To achieve a common platform, we strongly recommend that the CEC pursue the following objectives in its approach:

- **Take a modular approach to functional design:** determine the core needs for HOMES and the broader program stack in terms of functions and business processes and procure the best in class solutions.
- **Proactively anticipate and integrate existing offerings:** take an inventory of the relevant programs and offerings today that could be supported by the platform.
- **Foster third party innovation:** design a platform and incentive structure that is outcome-based while not hampering potential innovation from third parties.
- **Leverage and collaborate with related proceedings:** there are many forums in which the CEC and its stakeholders are currently looking to develop integrated statewide offerings to CA utility customers; the CEC should integrate the learnings and engagement there to inform the design of an integrated statewide platform.

We outline each of these objectives, how they address the Commission’s questions, and their rationale in greater detail below.

Take a modular approach to functional design

There are many ways to describe and categorize the components of an energy program, but a helpful framework is to start with the user journey from the household/participant perspective. User journey mapping ensures that the program design achieves the intended experience. From there, the components required to support that journey can be determined. Taking this approach for a general energy program, households will follow some or all of these steps:

- **Awareness:** Household made aware of program options.
- **Investigation:** Seek out further information on program options.
- **Initial contact:** Contact potential program contractors.
- **Assessment:** Household provides data to contractor(s) who then conducts assessment.
- **Decision:** Household chooses to enroll in the program.
- **Installation:** Contractor(s) installs measures.
- **Rebates and payment:** Household pays for costs net of rebates provided by the program.
- **Verification/evaluation:** Household provides data/feedback as needed to ensure effective program delivery.
- **Ongoing monitoring:** Saves on bills and provides ongoing data for reporting.

The table below maps these functions to the platforms or software tools that support each function.

Program Component	Supporting Platform
Awareness	Marketing
Investigation	Educational and engagement
Initial contact	Trade ally management
Assessment	Data access, modeling
Decision	Enrollment
Installation	Work order management
Rebates and payment	Rebate processing
Verification/evaluation	Data access, measurement and verification
Ongoing monitoring	Data access, reporting

Taking a modular approach to program design, the CEC could provide a “stack” of statewide tools that provide these functions in a consolidated manner to a wide array of programs. In fact, many of these functions already exist in some form with existing or developing programs at the CEC and elsewhere.³

This is supported by comments made to this RFI by key stakeholders implementing programs today as well. For instance, the Joint CCA’s notes in their comments the need for consistency:

“Contractors and participants can face difficulties understanding and meeting all the requirements needed to qualify and stack incentives across different programs... CEC should replicate existing application platforms, data collection procedures, and other administrative activities to easily familiarize contractors and participants. In addition, CEC should standardize technology performance standards across its programs and publish a list of qualified products to help contractors and participants choose products easily across different programs.”⁴

Some critical components, however, remain missing. For instance, a critical missing component across the state is a common data access platform that effectively and securely allows households to share their utility data with program stakeholders (e.g. contractors, aggregators, administrators, etc.) to confirm eligibility, energy usage, and measure performance. Without this platform, an unnecessary burden will be placed on the program administrator, households, and

³ As noted also by the Flex Coalition in their response to this RFI, California has a wide array of existing programs supporting a similar structure. Flex Coalition, “Flex Coalition Comments Re - IRA HOMES Program”, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254156&DocumentContentId=89506>

⁴ Joint CCAs,” Joint CCA Comments Re Request for Information Re Inflation Reduction Act Residential Energy Rebate Programs”, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254157&DocumentContentId=89507>

utilities. Additionally, without a secure platform meeting industry and government standards for security and privacy, unnecessary risks could be introduced. We appreciate comments in support of this from other stakeholders, such as Ohmconnect, who note:

“In addition to the precedent of using customer data in program implementation, the CEC has the opportunity to improve the timeliness of receiving data, as well as improve customer data authorization and access for participants....”⁵

Under this approach, the Commission would contract with a program administrator to outline the overall design and then procure best-in-class providers for each of these modules in concert with the program administrator. This ensures that the best product is in place for each of the necessary components, allows the program administrator to focus on services and integration bespoke to the programs being integrated, and gives the Commission (and the state as a whole) a resilient program architecture where approach/providers can be adjusted at each functional step without having to restart the program from the ground up. This will also help to maintain consistency for households and contractors over time.

- ii. *Aside from ensuring that program participation is a simple process from the resident’s point of view and the need to avoid cash outlays, how should the program be structured to support widespread access and uptake in households located in disadvantaged communities or with a low income? How could CEC structure HOMES’s pay-for-performance option to reach low-income communities more effectively?*

We believe that the best way to support widespread access and uptake in households located in disadvantaged communities is to pursue the modular approach to program design noted above. Such an approach and deployment of this type of platform could consolidate the often redundant processes that exist within each program, including education, trade ally network management, eligibility screening, secure data acquisition, site modeling/auditing, enrollment, installation best practices, reporting, and evaluation. By creating one process, households will have a coherent view of their options, soft costs for contractors would be diminished, and some portion of existing program administrative budgets could be better directed to the households they’re meant to serve.

In addition, a data-driven, pay-for-performance, or measured savings rebate pathway approach also better enables finance, through public, non-profit, or private sources, to reliably underwrite investments in comprehensive retrofits. This will be critical in low-income homes, where the upfront costs and access to low cost credit can be a major barrier.

⁵ Ohmconnect, “OhmConnect Comments to Request for Information”, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=253879&DocumentContentId=89169>

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- iii. *If funds are provided directly to existing residential efficiency programs, which programs will make the highest impact in terms of market transformation for efficiency and decarbonization technology?*

If the CEC elects to distribute funds to existing residential efficiency programs, we recommend funding be distributed to programs pursuing the measured savings approach. California already has a number of successful programs that leverage the measured savings pathway, including the programs operated by Tri-County Regional Energy Network (3C-REN), Sonoma Clean Power (SCP), Marin Clean Energy (MCE), and Peninsula Clean Energy (PCE).

However, the distribution of funding to existing residential efficiency programs does not eliminate the need for the CEC to make strategic investments in the modular components of a common platform to achieve statewide eligibility and streamline implementation.

For example, only one (1) of the four (4) Community Choice Aggregators (CCAs) implementing a pay-for-performance program noted above have their own data access platform creating unnecessary program friction. By investing in a common data access platform, the Commission can help streamline all existing residential efficiency program implementation, increase household participation in disadvantaged communities, and support the development of additional local programs.

Proactively anticipate and integrate existing offering

The following questions from the CEC hit on many of the functional or business process requirements that a program would need to have in place. Many of the questions surround how best to horizontally integrate different functions, so we've included our answers to them here:

- iv. *Leveraging and stacking:*
- a) *CEC has gathered feedback on how electrification incentives could best be leveraged and stacked with existing programs. Are there additional considerations for best leveraging and stacking residential whole house efficiency rebates, like HOMES with existing programs?*

When trying to leverage and stack rebates, it is critical that common platforms are used to select measures, calculate expected impacts, determine incentives, and process these rebates. If this is not the case, the program runs the risk of double counting and/or inefficient measure selection. Additionally, interactive effects between measures can be easily missed. Further, the use of multiple tools increases integration and administrative costs between parties as well as the likelihood of error.

b) Are there considerations for stacking pay-for-performance rebates (see below) with existing programs?

While we don't recommend an approach overly focused on attribution of impacts to a specific funding source, having a holistic picture of total funding and total impact allows for a complete picture of the overall effectiveness of the program. If different methods are used to calculate impacts — for example, a mix of deemed, modeled, and measured approaches — then this allocation can be disjointed, cumbersome, and sometimes results in nonsensical results (e.g. the sum of individual savings exceeding total bill amounts). Therefore, when looking to stack rebates in a program, especially for pay-for-performance, we recommend taking a measured approach using a common platform.

c) What are the best strategies for effective and efficient integration into existing programs' administration, websites, and materials?

As outlined above, using best-in-class platforms across the programs, with backend integration done for the individual programs — ideally through an enterprise service bus — is the most effective approach. This is critical in this context because it:

- Creates a seamless and low-friction customer experience;
- Minimizes external touchpoints (customer requests, contractor requirements, etc);
- Consolidates and standardizes integration requirements;
- Ensures that each function is served by best-in-class providers focused in that area.

d) Which existing program quality assurance, quality control, workforce, or other implementation standards or best practices should be taken into consideration or used as a model?

We recommend that the Commission adhere to standards and requirements provided by DOE and others on proper program implementation, data sharing, privacy, and evaluation. A non-exhaustive list of these requirements includes:

- Ensuring contractors use modeling tools that are BPI 2400 compliant;
- Requiring SOC II compliance for platforms managing Personally Identifiable Information (PII);
- Utilizing a statewide data access platform that is certified by the Green Button Alliance to meet the Green Button Connect My Data Standard;
- Adhering to the code of conduct outlined in the DataGuard Energy Privacy Policy Program;
- Using open standards, such as CALTRACK and OpenEEMeter, for performance measurement;

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- Having a robust process evaluation that is consistent with industry standards.
 - b. **Rebate determination approach and rebate values.** DOE offers both a modeled and a measured savings pathway. The measured savings pathway requires energy savings of 15 percent or greater per home or portfolio of homes. As noted above, through the measured savings pathway, the state can choose to set rebate values by either 1) paying a fixed portion of the project cost (80 percent for low-income households and 50 percent for households with income at 80 percent AMI or greater or 2) a pay-for-performance calculation payment rate equal to \$4,000 for a 20 percent reduction of energy use for the average home in the state for low-income households and \$2,000 for a 20 percent reduction of energy use for the average home in the state for households with income at 80 percent AMI or greater. States may seek approval from DOE to increase the maximum amount available for low-income households. For both measured pathway options, CEC is to receive and review nine to 12 months of each retrofitted home's energy consumption data to confirm 15 percent of energy savings prior to issuing a rebate to the contractor, aggregator, or program implementers. Additionally, states must design programs such that low-income households are not required to use personal funds to pay for rebate-covered work.
 - i. What are the advantages and drawbacks of program design using the fixed costs versus pay-for-performance method? Can the pay-for-performance method effectively serve low-income households?

While the Commission did not specifically ask in the questions above, we recommend a measured approach be the preferred rebate pathway for implementing HOMES, while permitting the modeled pathway in limited circumstances. In states with a less mature ecosystem, we see the value in taking a hybrid or modeled approach, but given the robust foundation of tools and programs in California, a measured approach is very achievable. The measured pathway provides a more reasonable threshold for savings and a more efficient means for measuring the impacts of a braided program offering. For instance, a modeled approach could be difficult, or impossible when programs begin to include offerings integrated with solutions like load flexibility or DERs.

While some stakeholders have and continue to argue that a modeled approach is a simpler pathway due to the avoided need for ongoing access to customer energy usage data, this approach still requires this data at the onset of the project. With a common data access platform, an account holder can authorize access to their data once, which can then be used for both historical and ongoing data collection. That is, the relative effort from collecting one-time historical data to calibrate a model and ongoing data to estimate measured performance should be functionally equivalent with a common data access platform deployed. Therefore, there is no material difference in the effort required between modeled and measured approaches.

In addition, a statewide data access platform is a particularly timely investment for the CEC, as it aligns closely with the implementation of the Load Management Standards. As noted in a recent workshop on this topic, the Load Management Standards will require integrations with California utilities and CCAs in order to support its core use cases. Households looking to compare different rates and solution providers looking to model different solutions will need to be able to secure access to utility data through a consent-driven process. While there has been some discussion indicating that utilities would manage this access themselves, comments by multiple stakeholders noted that these platforms are either not provided by the utilities and CCAs or those available are often unreliable, inconsistently implemented, provide inaccurate data, and present undue barriers to engagement.

Pay-for-performance can certainly serve low income so long as the participants themselves are shielded from the risk which they have little to no control over. There are many ways to approach this problem, such as applying an average performance metric across a portfolio.

i. What are the advantages and drawbacks of program design using the fixed costs versus pay-for-performance method? Can the pay-for-performance method effectively serve low-income households?

With regard to the appropriate level and structure of the incentive, we refer to Flex Coalition's comments which note the misinterpretation of incentive caps. We agree that this should be rectified in the final program design.⁶

ii. What are the options to manage and allocate performance risk and financing costs during the 9 to 12-month post-installation period prior to issuing the rebate? Options should consider at a minimum that: low-income households are not required to utilize personal funds to pay for rebated work, the inability for many contractors, installers, or small businesses to "float" rebate costs, and the cost of capital for aggregators (or some designated entity) to float those costs.

As noted in the Commission's question, it will be difficult for some customers or contractors to wait for performance-based rebates to be delivered nine (9) to twelve (12) months post-install, which means they will need some form of capital to cover upfront costs. Fortunately, there are a wide variety of capital solutions available to help overcome this hurdle, but the key to making these solutions more widely available and cheaper is ensuring funding institutions have access to data in a common format. For example, a statewide data access platform for customer utility data embedded in the HOMES program can provide underwriters the granular data they need on not

⁶ Flex Coalition, "Flex Coalition Comments Re - IRA HOMES Program", <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254156&DocumentContentId=89506>

just usage data, but potentially billing and payment history, will help to ensure that they can more accurately understand the risk profile of the overall portfolio of projects.

- iii. For the fixed cost method, how should the CEC approach setting allowable project cost caps? What are similar programs CEC should use as examples?*

We do not have any specific comments on this question.

- iv. What is the best way for the CEC to obtain consistent and sufficient documentation for contractors, such as itemized cost breakdowns, while remaining consistent with contractor business practices?*

Providing contractors and aggregators with a common set of intake forms through a best-in-class work order management system will ensure rebate forms are submitted effectively. Inconsistency in processes/tools between programs leads to confusion and increased effort, which reduces the risk of incomplete or inaccurate documentation.

c. Eligible recipients.

- i. Should CEC reserve additional HOMES funds for low-income households, beyond the DOE-requirement of 50 percent of total rebate funds? If so, why, and what percent?*

We believe this will be difficult to answer without first making a decision about the likely set of programs to be braided through a combined deployment.

d. Income Verification.

- i. What approaches should CEC consider to verify individual household income that are efficient and accurate, safeguard information, and create a minimal burden for residents? Please provide examples of other programs and why you consider them effective models?*

Income verification should be integrated into a single enrollment and data authorization process. One reason is to leverage potential qualifying data fields that are available within utility data that will already be required as a part of broader eligibility, modeling, and ongoing monitoring.

For instance, when a customer authorizes the data access platform to share their utility data with a HOMES program stakeholder (e.g., contractor, aggregator, program administrator), that stakeholder will know whether that potential program participant is enrolled in the California Alternate Rates for Energy (CARE) program or Family Electric Rate Assistance Program (FERA).

For other criteria, that same platform could incorporate a manual upload option where the participant could provide PDFs or photos of required documents.

- ii. *The EBD Direct Install Guidelines established a list of federal and state assistance programs that can be accepted to qualify a resident as low-income (i.e., “Categorical Eligibility”). Should the CEC utilize the same list of programs for Categorical Eligibility for a program(s) developed with HOMES funding? In addition to the programs found in Section E.3. of the Guidelines, are there additional programs CEC should consider?*

We have no specific comments on this question.

Foster third-party innovation

The final program design objective we stress is taking an approach that allows for and actually encourages third-party innovation. Innovation could come from many places, including contractors, aggregators, community-based organizations, and/or financial institutions. In all cases, this innovation is most effectively fostered by a program design that is lean, streamlined, robust, and focused on outcomes over bespoke or overly prescriptive guidelines.

The foundational elements of the HOMES program already lend themselves to enabling more innovative approaches, given the focus on performance-based incentives, the stress on a statewide deployment, and an emphasis on consolidating funding sources. We would encourage the CEC to look to successful state and regional models for program deployment that have fostered great success elsewhere.

As an example, the ConnectedSolutions program in New England⁷ has fostered a wide array of deployment models at the provider level by deploying a simple performance-based program design across multiple states and utilities. In that program, a consortium of utilities has deployed a common program that pays aggregators (and subsequently households) for grid services based on simple-to-understand performance payments, with a mix of upfront and ongoing payments. Marketing is done through a common effort, program management, and device orchestration using a single, industry-leading, vendor platform. Devices and installers must meet specific requirements and standards to participate to ensure quality delivery. Added capacity payments are provided for low-to-moderate income (LMI) customers.

Within this simple, consolidated model, not only have the utilities achieved great success in rapidly recruiting new resources, but by maintaining a lean, consistent, and outcomes-based design, it has allowed for innovative business models to be built on top of it. For instance, the LMI-focused developer Posigen was able to use this program to develop no-money-down solar

⁷ Clean Energy Group, “ConnectedSolutions: A New State Funding Mechanism to Make Battery Storage Accessible to All”, www.cleanegroup.org/wp-content/uploads/connected-solutions-policy.pdf

plus storage offerings by bundling grid service payments into their lease products, thereby creating both bill savings and resilience for their customers.⁸

There is tremendous potential for the CEC to achieve similar success by taking a statewide approach to build decarbonization that uses a measured, data-driven approach built on a foundation of best-in-class tools to braid together a wide array of new and existing funding sources.

Leverage and collaborate with related proceedings

While this was not discussed within the RFI, we also encourage the Commission to note the relevant proceedings taking place that should be taken into consideration as the program is designed and implemented. A list of related proceedings includes but is not limited to the following:

- **CEC: Load Management Standards Implementation (23-LMS-01):** The development of the MIDAS database and forthcoming rate tools presents an opportunity to develop a common platform where third-parties can help households optimize their rate as well as be referred to beneficial rebate programs such as the HOMES program.
- **CPUC: Demand Flexibility Rulemaking (R.22-07-005):** This proceeding covers a wide array of relevant issues, including the IOUs compliance plans for the Load Management Standards and the enabling technology they will put in place to allow customers to manage against those rates.
- **CPUC: DER Cost Effectiveness and Data Access (R. 22-11-013):** As a part of this proceeding, the CPUC will establish a customer data access working group to ascertain the need and appropriate approach for broad data access for third parties and programs.

The HOMES program and DOE's explicit emphasis on equity, market transformation, and data access provide a clear opportunity for the CEC to speak in these forums with a vision for a common market transformation platform that can ease the administrative burden and achieve common goals across these proceedings.

Conclusion

We completely recognize how daunting the task in front of the CEC is; however, the CEC has done an incredible job building toward this moment, with foundational investments in building decarbonization, efficiency standards, load flexibility, and data-driven decision-making.

⁸ Generac, "Generac Grid Services, PosiGen Announce a First-of-its-Kind Program to Expand Access to Clean Energy for Low- to Moderate- Income Residents", <https://investors.generac.com/news-releases/news-release-details/generac-grid-services-posigen-announce-first-its-kind-program>

As it looks to design the HOMES program, we hope that the CEC recognizes the opportunity to develop a model for the country to look to, demonstrating how a state can use these funds to drive true market transformation.

By making critical investments in core infrastructure like program enrollment, delivery, and data access, the CEC can help simplify and streamline the programs across the state while ensuring that HOMES funds act as a catalyst for broad societal benefit.