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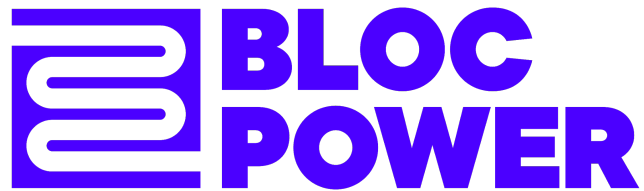
BlocPower Response- RFI Inflation Reduction Act Home Efficiency Rebate Program

Additional submitted attachment is included below.

REQUEST FOR INFORMATION
Inflation Reduction Act
Home Efficiency Rebate Program (HOMES)
Docket No. 23-DECARB-01

January 26, 2024

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BlocPower Overview

BlocPower is a Black-owned climate technology startup that leverages proprietary software, innovative financing, and construction management practices to decarbonize buildings across America. By combining community-led electrification campaigns with in-house, turnkey electrification services, the company provides a scalable model for decarbonizing Justice40 communities across America.

Input Request

As stated above, CEC is planning to braid California's allocation of HOMES funding into the EBD Direct Install Program.

- RFI Question 1 below solicits feedback on that plan.
- The remaining questions apply should the CEC not braid HOMES funding into the EBD Direct Install Program.

These questions fall into four categories:

1. overall program design
2. rebate determination approach and rebates values
3. eligible recipients
4. income verification.

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 million⁵ to the EBD Direct Install Program and adopted Direct Install Program Guidelines⁶ 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.⁷

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.

- a. 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.

BlocPower Response

BlocPower has conducted an extensive analysis of the DOE's IRA guidance documents, as well as external resources from organizations including Rewiring America and ACEEE, in order to understand the best possible ways to braid federal and state funds for the most impactful rebates and incentives. One suggestion based on this analysis is to provide a few project pathways based on suggested electrification projects for building owners that guide them through the different available incentives, rebates, and state funding programs that apply to their project. For example, one pathway for a building owner new to electrification would be to encourage households with incomes 80% AMI or lower to start with the EBD program and other local utility income-based programs to cover an energy audit and insulation / building envelope upgrades. The next step would be to use the EBD program OR the HEAR

appliance rebate program for all energy efficient appliances the building owner is looking to install, including air source heat pumps, heat pump water heaters, heat pump clothes dryers, electric panel upgrades, and induction stoves. The final step would be to collect all receipts from project related costs and all energy bills for one year after project completion and apply them to the HOMES program for the energy savings rebate. Electric panel upgrades are the only project measure that can benefit from both the HOMES energy savings rebate and the HEAR appliance rebate. Other suggested pathways can vary depending on the building needs and how many electrification upgrades a building owner has already completed. For example, If a building owner already completed energy efficiency upgrades including an energy audit and insulation / building envelope on August 16, 2022 or later and has project cost receipts and energy bills saved for a year, we suggest the building owner apply for the HOMES energy savings rebate first as the rebate is available now for projects completed on August 16th, 2022 or later.

Households with incomes in the 80-150% AMI bracket do not qualify for the EBD Direct Install Program. Middle-income households should start with insulation and energy audits, which will be covered by the HOMES energy savings rebates. Then, they should apply for the HEAR appliance rebate for energy efficiency appliances. Lastly, middle-income households can apply for the HOMES energy savings rebate with all of their project cost receipts if they achieve at least 20% energy savings from their electrification upgrades.

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?

BlocPower Response

The HOMES program provides performance-based rebates for whole-house energy saving retrofits. The amount of the rebate varies depending on the amount of energy savings. For eligible LMI households, the rebate level is higher. The highest rebate of up to \$8,000 per unit (or 80% of total project cost) is reserved for LMI multifamily buildings with at least 50% of households with incomes less than 80% AMI that achieve 35% or more in energy savings from their electrification upgrades. Multifamily buildings with at least 50% of residents in the 80-150% AMI range can receive up to \$4,000 per unit up to \$400,000 per building if they meet 35% energy savings or greater. Based on California's state decarbonization and electrification goals to deploy 6 million heat pumps by 2030, 3 million climate-ready and climate-friendly homes by 2030, and 7 million climate-ready and climate-friendly homes by 2035, the best use of the HOMES program would be to maximize the allocation of HOMES funds to go towards LMI multifamily buildings in climate justice communities.

In addition to maximizing the allocation of HOMES funds to LMI multifamily buildings, a robust education campaign on the benefits of heat pumps (air source heat pumps, heat pump hot water heaters, pool heat pumps, and heat pump clothes dryers) and electrification in general will be needed to gain community support. Utilizing existing income-qualifying programs such as Weatherization Assistance Program and partnering with local community-based organizations on education will be critical to gaining support from multifamily building stakeholders. Educational resources must be accessible at no cost to LMI communities in order to support the growth of heat pump project deployment, along with other electrification projects such as gas to induction stove upgrades.

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?

BlocPower Response

According to the most recent U.S. Census renters make up 45.5% of California's households, and more than 40% of households in the state are considered low income. Program support is needed from both landlords and tenants, who have different goals and concerns in mind for electrification projects. Targeted education campaigns for landlords and tenants will improve understanding of electrification benefits for both groups while meeting their specific needs. Hosting program events to have landlords and tenants learn together and talk with each other about how electrification can improve quality of life for all stakeholders can have a positive impact on program deployment and make the process for both landlords and tenants easier to navigate.

One example of a pilot program that is working to address the landlord-tenant split-incentive issue is called Inclusive Utility Investment (IUI) or Tariffed on-bill financing (TOBF), a form of investment used to finance clean energy improvement projects that are recovered through utility rates. This is being led by the California Public Utilities Commission (CPUC), with partnerships with other investor-owned utilities (IOUs; e.g. PG&E), and Silicon Valley Clean Energy (SVCE). It's expected to roll out on a larger-scale in the next year. On-bill financing programs place the responsibility on the customer, potentially increasing utility bills. Inclusive Utility Investment (IUI) shifts responsibility from the customer to the utility company. The utility is making the investment in clean energy and energy efficiency measures. To recover a portion of the investment, utilities can place a tariff (or cost recovery charge) on the customer's bill. However, this charge must be less than the customer's expected bill savings (typically no more than 80% of expected savings). This type of financing may be used to deploy the pay-for-performance rebates through local utilities.

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?

BlocPower Response

The most impactful types of electrification and decarbonization programs that maximize energy efficiency technology adoption are point-of-sale incentives and direct-install programs, such as the EBD program. This is because building owners and tenants can receive incentives immediately through purchasing energy efficient equipment or starting an energy efficiency project such as insulation work, decreasing the upfront costs. Immediate incentives and rebates are the most helpful for LMI households because they lower the amount of upfront capital needed to start a project, and the cost of the beginning phases of an energy efficiency project such as the cost of an energy audit or insulation may be initially too high for LMI customers to move forward. Providing funds to programs such as the EBD program, the [California Energy Smart Homes Multifamily Alterations Program](#), and [Energy Upgrade California](#) for home assessments can make the HOMES funds more accessible to LMI multifamily building owners and tenants who may already be familiar with these programs and are looking for the first steps in the energy efficiency journey.

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?

BlocPower Response

BlocPower recommends keeping separate tracking systems in place to record all electrification projects and their funding sources, with each funding source having its own project tracking system. While stacking and braiding of funds for electrification projects is generally accepted by the DOE IRA HOMES programs, it is important to distinguish between HOMES-funded projects and projects funded by other programs. HOMES funding can only be applied to single project measures (such as a singular heat pump appliance project). Therefore, in order to maximize the HOMES rebates in combination with other funding sources, it is critical to document all project-related costs and plan ahead for which funding sources will apply to different measures within an electrification project. If a project at a singular building address includes multiple heat pumps (ie. a single family home with 2 heat pumps), each heat pump will need to have a separate funding source based on the DOE guidance rules and the size of the rebate (max of . For example, one heat pump can be covered by the HEAR appliance rebate program, while another heat pump can be covered by the EBD program- each of these heat pump projects will need to be tracked separately (project costs / receipts / proposal) even if both are completed by the same contractor.

Another best practice is to ensure that LMI multifamily buildings that already receive federal grant funding (through HUD or a federal loan) are aware that they can combine their existing funding with the IRA HOMES rebates. LMI multifamily buildings in affordable housing communities are eligible for the greatest HOMES rebates and incentives, and they can be combined with the existing funding the buildings already receive, resulting in even greater discounts for heat pump and electrification projects. Developing a plan for assisting LMI multifamily building owners with the application process for IRA HOMES funding in combination with existing federal grants will also be beneficial to the overall success of achieving the State's decarbonization goals.

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

BlocPower Response

Pay-for-performance rebates would be issued to building owners 9-12 months after project completion in order to analyze energy bills to ensure the building meets the energy savings requirements. The building owner should keep all records and receipts of project-related costs for the year after project completion. Therefore, building owners should consider applying for existing programs first and benefit from point-of-sale rebates for appliances such as the EBD or HEAR appliance programs, income-qualifying programs for weatherization projects, and ensure that all possible funding sources are explored before applying to the pay-for-performance rebates. Weatherization/building envelope and electric panel upgrades may be covered by existing programs as well as included in the overall project costs for the pay-for-performance rebates. Electric panel upgrades are the only appliance eligible to benefit from the HEAR appliance rebate program combined with the HOMES energy savings program. Qualifying LMI building owners can choose to upgrade their electric panels first using the HEAR appliance rebate program or the EBD program, keep the receipts from the project costs, and then apply the electric panel upgrade costs to the pay-for-performance rebates 9-12 months after project completion.

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

BlocPower Response

Focusing on project type rather than incentive / rebate program is a key strategy to minimize

workload and make materials easy to understand for building owners / residents. Building owners tend to search for information about specific projects they are planning as opposed to rebate or incentive programs by name. Utilizing existing websites / materials can be maximized by integrating the HOMES program information as an additional funding source to help with existing program structures and electrification projects. For example, the EBD program website can include a small highlighted section about additional rebates and incentives that will apply to heat pump installation projects. Minimizing branding updates is key to avoid confusion and to keep the focus on completing heat pump projects.

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?

BlocPower Response

BlocPower brings workforce development expertise and a successful track record of deploying workforce programs. BlocPower, in partnership with the City of New York manages a \$54M workforce development program to train populations at risk of gun violence in emerging green technology trades. BlocPower's Civilian Climate Corps Program has provided training to 1,000+ men and women in basic construction skills and energy efficiency to kickstart their career opportunities in green collar jobs.

Our training is focused on providing participants with the basic trade skills and knowledge needed to pursue relevant follow-on skills for specific clean energy trades. Participants can easily enter with zero previous experience, and finish with certifications that enable them to take the next step in their trades career path.

BlocPower's course curriculum includes pre-training classes followed by technical training, which includes low-voltage electrical work, heating, ventilation, and air conditioner (HVAC) installation and workplace safety training. Most members then move on to on-site apprenticeships. BlocPower works to place trainees at BlocPower's partner contractor firms with an end goal of creating new career pathways for underserved communities. This results in building a clean energy workforce pipeline with short and long term results.

BlocPower recognizes that training is not enough, and that these communities need an established opportunity pipeline to gain follow-on skills, and jobs. In order to fulfill this need, BlocPower has developed relevant partnerships with industry partners to ensure there are tangible next steps after training. Our workforce partnerships include relationships with major heat pump manufacturers (Daikin and Mitsubishi) to funnel recruits into more advanced and specific training programs. Our success with this program has led to contracts with several other cities to develop building decarbonization workforce programs. These cities include the City of San Jose (CA), City of Menlo Park (CA) and City of Ithaca (NY).

BlocPower pays particular focus towards measuring success through the number of students trained, job placements earned, and number of students that complete training and earn relevant certifications, and industry-applicable certification. All successful trainees receive certifications including OSHA and site safety training after which they receive on-the-job training in clean energy construction jobs, including building electrification, solar, electrician and plumbing work. BlocPower pays trainees to attend training (\$20/hr) in order to increase retention and maximize equity.

NY Clean Heat Program- A Model for Electrification Project Standards and Procedures

BlocPower has worked with the NY Clean Heat Program to provide NYS households with energy



efficiency retrofits and upgrades since the program's inception in 2012. BlocPower has completed many energy efficiency projects utilizing incentives from the NY Clean Heat Program.

According to the most recent [NY Clean Heat Program Manual](#), the NYS Clean Heat Program funding has been designated by the New York State Public Service Commission through the Joint Efficiency Providers. Incentives are offered for Air-Source Heat Pumps and Ground-Source Heat Pumps for both space heating and cooling as well as for Heat Pump Water Heaters for water heating.

Contractor Application Process: To apply for incentives under this Program, ASHP installers, ASHP designers, GSHP installers, GSHP designers, and GSHP drillers must first become "Participating Contractors" by submitting a [Participating Contractor Application](#) indicating the service territories in which they plan to perform work and a Contractor Participation Agreement for each of those specified territories. Upon approval, the applicant will receive an approval notification from the Electric Utility and become eligible to apply for incentives in the Program.

Incentive Distribution: Project incentive amounts are paid directly to the Participating Contractor after the project has been completed. The project incentive amount, less the optional Contractor Reward, is required to be passed along to the customer. Participating Contractors may request that the project incentive be paid to an alternate payee. Multifamily buildings with 5 or more units have a cap of \$1 million per project or up to 50% of project costs covered, whichever is lower.

Communication Process: The Joint Management Committee ("JMC"), which is responsible for reviewing and maintaining the NYS Clean Heat Statewide Heat Pump Program, follows a process for making ongoing changes to program areas including incentive structure, eligible technologies, program rules, and other features in order to be responsive to technology and market developments and to maintain market confidence and stability. Participating Contractors will be notified electronically of any program modification or change, and reference documents are publicly available on the [NYS Clean Heat Resources webpage](#).

Decommissioning: The NYS Clean Heat Program requires all fossil fuel heating equipment to be decommissioned and gas pipelines to be capped for all incentives for single family, multifamily, and small commercial businesses.

Equipment Sizing: System performance, comfort, and energy efficiency can be significantly impacted by poor sizing and system selection. The ASHP and any connected ductwork must be properly sized for the application to meet the building heat load requirements, ensure occupant comfort and satisfaction, and optimize system performance and energy savings. Participating contractors must use a [market-specific guide from NEEP](#) to adjust equipment sizes depending on project scope and building needs.

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?

BlocPower Response

Both measured pathway options for the HOMES rebates enable contractors to provide more specific electrification recommendations based on measured building performance through energy audit data as well as measured energy savings goals. Contractors will be able to use this information to provide more accurate project cost estimates, which will be covered up to certain amounts depending on the building owner's income. While this method requires more up-front data acquisition from the building owner such as an in-depth energy audit to calculate specific building needs, the customer will have a clear understanding of project costs and how much the customer will receive in rebates.

The pay-for-performance rebate option may leave customers feeling unsure about total project costs and affordability. LMI customers will benefit from the fixed cost option because they will see a specific amount of their project costs covered as soon as they meet the 15% energy savings requirement. The fixed cost percentage option most likely will cover more than the pay-for-performance amount depending on the overall project costs, which would have a greater impact on LMI households. Engineering design models and reporting requirements to prove energy savings achievements will likely cost more than the pay-for-performance rebate would provide, and engineers would likely not participate in the pay-for-performance program at the proposed rates.

- 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.

BlocPower Response

BlocPower has developed a financial mechanism for building owners to easily access critical upgrades at no upfront cost. BlocPower offers a capital lease for residential properties (a lease to own) and an operating lease for commercial properties (MF & commercial) which guarantees the equipment for 15 years. These come with low, non variable payments and offer a 15 year term to make it more affordable. BlocPower's lease product is secured by the equipment itself so unlike other energy efficiency financing offerings, we will not put a lien on a customer's property. All available rebates and incentives are used as down payments, even if they are collected months after installation, which enables contributions from various funding sources – this financing allows projects to begin faster, rather than having to wait for (qualified) incentive monies to arrive. BlocPower ensures that customers qualify for the relevant incentives and rebates before proceeding with a lease offer. BlocPower's financing structure, which builds upon the strong track record of similar agreements in the solar energy industry, has been shown to increase adoption by reducing complexity, helping manage risk, and critically, by providing ready access to the capital needed to put these important improvements in place. The structure is unique to BlocPower, having been developed over several years. The funds have been raised from mission-aligned investment funds, including Microsoft's Climate Fund.

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?

BlocPower Response

According to the [2022 San José Customer Economics Analysis for Residential Building Electrification](#) conducted by the Building Electrification Institute, whole-home electrification installation costs are \$3,000-\$4,000 higher compared to a gas replacement and central A/C. However, in low-rise multifamily buildings, whole-home electrification costs are \$6,000-\$10,000 higher than a gas replacement system. The study shows that the average cost for an electric HVAC system upgrade such as gas to air source heat pumps for a multifamily building built pre-1990 was \$12,950; and the average cost for the same system in a multifamily building built post-1990 was \$12,810. Based on this data and the expected increase in hot weather days in the summer months across the state, project cost caps should at least cover the costs associated with gas to electric HVAC system replacements, which would be a cap at \$10,360 to cover 80% of project costs related to an air source heat pump system costing \$12,950 for a pre-1990 multifamily building. However, it is best to cover more than the HVAC system costs in order to encourage whole-home electrification upgrades that include heat pump hot water heaters, induction stoves, insulation, panel upgrades, and more. An effective cap for project costs overall would be closer to \$14,000 to account for additional projects. The \$14,000 cap matches the cap for the DOE HEAR appliance rebate program.

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?

BlocPower Response

Utilizing existing programs such as the [TECH Clearinghouse through Energy Solutions](#) can help streamline efforts to obtain updated documentation from contractors without introducing new data acquisition processes. TECH Clean California enables the public to search for contractors in their county who perform air source heat pump and/or heat pump water heater installations. This information can be used to keep record of active contractors working on electrification projects by county, and can be used to filter contractors based on specific target customers including multifamily, single family, and if contractors participate in low income programs. The TECH database also can be used to determine impactful projects based on documented energy savings and average cost data by project type. One of TECH's requirements for contractors is to submit all project invoices including itemized project costs and applied incentives, making TECH a great resource to determine how local incentives can be stacked and how contractors are currently reporting on completed projects.

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?

BlocPower Response

Aside from low-income households, a large portion of households in California are households within the 80-120% AMI (middle-income) bracket. According to the [2022 report](#) "The Landscape of Middle-Income Housing Affordability in California" by the Turner Center for Housing Innovation at UC Berkeley, housing affordability across the state has significantly decreased and the amount of residents earning median incomes who are staying renters is increasing. As more middle-income residents decide to stay renters due to increasing housing costs, this creates a shortage of affordable housing for low income residents. Additionally, there are very few incentive programs that cater to residents in the 80-120% AMI bracket. All renters, regardless of low or moderate income status, should have access to

rebate funds in order to lower the cost burden that renters are facing in California. Therefore, keeping the 50% allocation of total rebate funds for low-income households would allow the other half of the total rebate funds to be split amongst middle-income households who will benefit greatly from the rebates as they are commonly excluded from energy efficiency incentive and rebate programs. Some of the rebate funds (at least 20%) should also be allocated towards new affordable housing for whole-house electrification projects to encourage growth in affordable housing creation, which is needed to improve housing affordability for middle-income residents and provide additional housing for low-income residents.

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?

BlocPower Response

The California Alternate Rates for Energy (CARE) program through the California Public Utilities Commission can be used to determine if a project is eligible for income-qualifying incentives (HOMES / HEAR) based on if the customer qualifies for the CARE program. The CARE Program states that qualifying low-income customers receive a 30-35 percent discount on their electric bill and a 20 percent discount on their natural gas bill. Encouraging households to sign up for the CARE program can help reduce household energy bills, increase visibility on income verification processes, and help residents start thinking about electrification as a method to lower energy bills long-term. Collaborating with the California Public Utilities Commission to gather information on low-income neighborhoods can be a strategy for beginning to target outreach and education campaigns as well as learn about building needs in LMI communities.

Implementing a third-party income verification provider can reduce liability risks for CEC. For example, [Promise Pay](#), a California-based Black-owned company has income verification solutions that are currently used in the marketplace. [TECH Clean CA](#) also provides a list of required documentation needed for income verification, and has a [free income verification form](#) for households to fill out if they are considering installing a heat pump with a TECH-certified contractor. California Lifeline, an income-qualifying state program providing cellular services to LMI households, is currently testing a third party income verification system.

- 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?⁸

BlocPower Response

The DOE published its own [list](#) of programs for Categorical Eligibility. After comparing both the DOE list and the EBD list of programs for Categorical Eligibility, CEC should consider adding the following programs.

CEC should consider adding the [Housing Improvement Program \(HIP\)](#) for Tribal Nations. According to the U.S. Gov Benefits website, The Housing Improvement Program (HIP), is a home repair, renovation, replacement and new housing grant program administered by the Bureau of Indian Affairs (BIA) and federally-recognized Indian tribes. CEC should also consider the [HUD Low Income Housing Tax Credit \(LIHTC\)](#) in addition to the current list of programs in the EBD Direct Install Guidelines.

Responses and Comments

Written comments may be submitted to the Docket Unit by 5:00 p.m. on Friday, January 26, 2024. Written comments, attachments, and associated contact information (including address, phone number, and email address) will become part of the public record of this proceeding with access available via any internet search engine.

The CEC encourages the use of its electronic commenting system. Visit the e commenting page for this docket 23-DECARB-01 at <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-DECARB-01>. Enter your contact information and a subject title that describes your comment. Comments may be included in the “Comment Text” box or attached as a downloadable, searchable document in compliance with California Code of Regulations, Title 20, section 1208.1. The maximum file size allowed is 10 MB.

Written comments may also be submitted by email. Include docket number 23-DECARB 01 and “RFI Inflation Reduction Act Residential Energy Rebate Programs” in the subject line and email to docket@energy.ca.gov.

A paper copy may be mailed to:

California Energy
Commission Docket Unit,
MS-4
Docket No. 23-DECARB-01
715 P Street
Sacramento, California 95814

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Media Inquiries. Email mediaoffice@energy.ca.gov or call (916) 654-4989.

Technical Subject and General Inquiries: Email Miriam Joffe-Block at miriam.joffe_block@energy.ca.gov or call (916) 883-6262.

⁸ <https://www.energy.ca.gov/publications/2023/equitable-building-decarbonization-direct-install-program-guidelines>.

Availability of Documents: [Documents and presentations](#) for this meeting will be available at docket 23-DECARB-01, at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=23-DECARB-01>.

When new information is posted, an email will be sent to those subscribed to the Federal IRA Residential Energy Rebates list. To receive these notices or notices of other email subscription topics, visit [Subscriptions](#), at <https://www.energy.ca.gov/subscriptions>. The Inflation Reduction Act Residential Energy Rebate Programs [webpage](#) can be found at <https://www.energy.ca.gov/programs-and-topics/programs/inflation-reduction-act-residential-energy-rebate-programs-california>.

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