



REQUEST FOR INFORMATION ON THE INFLATION REDUCTION ACT HOME EFFICIENCY & ELECTRIFICATION REBATE PROGRAMS

Docket No. [DE-FOA-0002981](#)

ISSUE DATE: January 18, 2023

RESPONSES DUE: March 3, 2023

SUBJECT: Request for Information (RFI)

AGENCY: Department of Energy, State and Community Energy Programs (SCEP)

Description

This is a Request for Information (RFI) issued by the U.S. Department of Energy's (DOE) Office of State and Community Energy Programs. The intent of this request is to inform DOE on best practices for the Home Energy Rebate programs to support durable market demand for installations that improve housing energy performance nationwide. The Home Energy Rebate programs are comprised of two provisions authorizing \$8.8 billion in spending from the Inflation Reduction Act of 2022 (Sec. 50121 and Sec. 50122 of Pub. L. 117-169). Responses to this RFI will be used to create program guidance that will assist states, territories, and Indian Tribes in designing, managing, and improving Home Energy Rebate programs. The goal is to collect information that will ultimately support states, territories, and Indian Tribes in creating Home Energy Rebate programs that effectively serve U.S. households with technology products and services that reduce energy bills, increase home comfort, improve indoor air quality, and reduce greenhouse gas emissions.

Background

On Aug. 16, 2022, President Joseph R. Biden signed the landmark Inflation Reduction Act of 2022 (IRA) into law (Pub. L. 117-169). The law includes \$391 billion to support clean energy and address climate change, including rebates for home energy efficiency and electrification projects. Specifically, the Inflation Reduction Act of 2022 includes two provisions together authorizing \$8.8 billion in rebates relevant to this RFI:

- Section 50121: Home Energy Performance-Based, Whole House Rebates (Referred to as Home Efficiency Rebates)
- Section 50122: High-Efficiency Electric Home Rebate Program (Referred to as Home Electrification Rebates)

Together, these provisions are referred to as the Home Energy Rebate programs. These provisions authorize the following:

- \$4,300,000,000 in formula grants to State Energy Offices to carry out Home Efficiency Rebate programs. (Section 50121 of the IRA)

- \$4,275,000,000 in formula grants to State Energy Offices to carry out Home Electrification Rebate programs. (Section 50122 of the IRA)
- \$225,000,000 in formula grants to Indian Tribes to carry out Home Electrification Rebate programs. (Section 50122 of the IRA)

While federal rebates can be used to fund complementary upgrades, the IRA restricts applying both types of rebates to a single upgrade, and similarly restricts combinations with other Federal grants or rebates for a single upgrade.¹ The rebates, can however, be used in combination with tax incentives for energy-related home improvements. The Home Energy Rebate programs will help American households save money on energy bills, upgrade to clean energy equipment and improve energy efficiency, and reduce indoor and outdoor air pollution. DOE estimates that the home energy efficiency and electrification consumer rebates authorized will save households up to \$1 billion annually. More information about the Home Energy Rebate programs can be found [here](#).

U.S. DOE's Office of State and Community Energy Programs is working to distribute these funds so that households across the country can soon access these benefits. Congress has structured these rebate programs to be developed and implemented by State Energy Offices and Indian Tribes, with DOE providing guidance, support, and oversight. DOE is seeking to build upon the agency's knowledge of home energy efficiency and electrification technologies, tools, and programs through this RFI.

Purpose The purpose of this Request for Information (RFI) is to solicit input from states, local governments, energy contractors, labor organizations, manufacturers of energy efficient and electrification equipment and materials, community-based organizations, environmental and housing justice organizations, disadvantaged communities, other stakeholders, and Indian Tribes to inform the U.S. Department of Energy's program guidance for home efficiency and electrification rebate programs.

Responses to this RFI will be used to create program guidance and needed tools that will assist states, territories, and Indian Tribes, as well as potentially other entities, in designing, managing, and improving Home Energy Rebate programs. The goal is to collect information that will ultimately support creation of Home Energy Rebate programs that effectively serve U.S. households with technology, products and services that reduce energy bills, increase home comfort, improve indoor air quality, and reduce carbon emissions. SCEP does not intend to respond to individual submissions or publish a compendium of responses. **Respondents are encouraged to provide input only on questions of relevance or interest to them.** For any questions answered via an emailed word document, please include the question number prior to each response.

Definitions

The law introduces words and phrases that DOE has defined as follows. DOE may revise these definitions in response to feedback received in this RFI:

- **Aggregator:** An energy utility, or commercial, nonprofit, or government entity that may receive rebates provided under a Home Efficiency Rebate program for a group of homes and/or multifamily buildings.

¹ 42 U.S.C. 18795(c)(7) and 42 U.S.C. 18795a(c)(8).

- **Disadvantaged Community:** The Biden Administration’s [Justice40 Initiative](#) sets a goal that 40% of the overall benefits of certain Federal investments should flow to “disadvantaged communities” (DACs) that are marginalized, underserved, and overburdened by pollution. For the purposes of implementing the rebates, program administrators can use either of the following tools to identify DACs: [energy justice mapping tool](#) or [Climate and Economic Justice Screening Tool](#). Note that Tribal lands and U.S. territories, in their entirety, are categorized as disadvantaged communities in accordance with [OMB’s Interim Guidance](#).
- **Indian Tribe:** “Indian tribe” or “Indian Tribe” means any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.
- **Point of Sale:** The point at which the recipient of the rebate pays (or authorizes an entity to access a rebate on their behalf) for the covered equipment, improvement, and/or service (e.g., when purchasing in-store, through a distributor, at wholesale on-site, or online, or when entering into a contract with a contractor).
- **Program Administrator:** A state, territory, or Indian Tribe – or an entity acting on behalf of a state, territory, or Indian Tribe – charged with administering the rebates (i.e., rebate processing, tracking, reporting, among other responsibilities).

Disclaimer and Important Notes

This is a Request for Information (RFI) only. DOE will not pay for information provided under this RFI and no project will be supported because of this RFI. This RFI is not accepting applications for financial assistance or financial incentives. DOE will consider responses to this RFI as it develops program guidance, expected to be issued as an Administrative and Legal Requirements Document (ALRD) in 2023.

This RFI is not a Funding Opportunity Announcement (FOA); therefore, DOE is not currently accepting applications. Responding to this RFI does not provide any advantage or disadvantage to applicants to future funding opportunities regarding the subject matter.

Any information obtained as a result of this RFI is intended to be used by the Government on a non-attribution basis for planning and strategy development; this RFI does not constitute a formal solicitation for proposals or abstracts. Your response to this notice will be treated as information only. DOE will review and consider all responses in its formulation of program strategies for the identified materials of interest that are the subject of this request. DOE will not provide reimbursement for costs incurred in responding to this RFI. Respondents are advised that DOE is under no obligation to acknowledge receipt of the information received or provide feedback to respondents with respect to any information submitted under this RFI. Responses to this RFI do not bind DOE to any further actions related to this topic.

Confidential Business Information

Pursuant to 10 CFR 1004.11, any person submitting information believed to be confidential and exempt by law from public disclosure should submit via email, postal mail, or hand delivery two well-marked copies: one copy of the document marked “confidential” including all the

information believed to be confidential, and one copy of the document marked “non-confidential” with the information believed to be confidential deleted. Submit these documents via email or on a CD, if feasible. DOE will make its own determination about the confidential status of the information and treat it according to its determination.

Evaluation and Administration by Federal and Non-Federal Personnel

Federal employees are subject to the non-disclosure requirements of a criminal statute, the Trade Secrets Act, 18 U.S.C. 1905. The Government may seek the advice of qualified non-Federal personnel. The Government may also use non-Federal personnel to conduct routine, nondiscretionary administrative activities. The respondents, by submitting their response, consent to DOE providing their response to non-Federal parties. Non-Federal parties given access to responses must be subject to an appropriate obligation of confidentiality prior to being given the access. Submissions may be reviewed by support contractors and private consultants.

Request for Information Categories and Questions

A. Respondent Contact Information

1. Please provide your contact information, including your name, organization, type of organization (state government, non-profit/community organization, individual, etc.), phone number, and email address.

B. Accessible and Equitable Program Design

2. What best practices can program administrators and other relevant stakeholders (e.g., retailers, contractors, or community-based organizations) use to ensure that disadvantaged communities and low-income households are aware of and have easy access to the Home Energy Rebate programs?
3. How can DOE encourage program administrators to design their rebate programs to align with the Justice40 Initiative, which commits to delivering forty percent of the overall benefits (home improvements, jobs, etc.) from certain federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution?
4. How can DOE and program administrators ensure that community-based organizations, residents of disadvantaged communities, renters, and marginalized groups such as low-income residents, residents of color, rural residents, and Tribal residents are meaningfully engaged for the Home Energy Rebate programs? What other groups should be included?
5. How can the Home Energy Rebate programs help to minimize energy burden and costs, particularly in low- and moderate-income (LMI) and high energy burden households?
6. What types of program design approaches, guidelines, tools, savings analyses, policies or reviews can help discourage contractors from using rebates for upgrades that will likely result in higher annual household energy bills, particularly for low-income households?

7. What types of policies or requirements can be used to ensure that owners of rental properties receiving rebates targeted for low-income households continue to offer affordable rents for a reasonable time after improvements are made? How might DOE also incentivize multifamily affordable housing property owners to participate in these programs?
8. Given that rebate allocations are intended to be applied to residential properties within that state, tribe, or territory's jurisdiction, how can program administrators ensure proper rebate processing in instances when the equipment/service provider and the household are in two different jurisdictions?
9. What are best practices for implementing successful 'point of sale' rebates, including when considering contractor needs?
10. For federally subsidized, low-income housing, what specific program design parameters are necessary to ensure rebates can be used at these properties?
11. What quality control measures are needed to ensure that contractors practice safe and healthy homes best practices, and that projected savings are achieved?
12. Which Home Energy Rebate program components across Sections 50121 and 50122 should be implemented separately or together? Some examples could include:
 - i) Marketing, communications, branding
 - ii) Income verification
 - iii) Rebate processing
 - iv) Contractor requirements
 - v) Home energy assessments
 - vi) Data collection and reporting

C. Additional Design Considerations Specific to Indian Tribes

13. Funds reserved for Indian Tribes will be made available in "a manner determined appropriate by the Secretary". a. What factors should be considered in the determination? Factors could include population of a Tribe, average cost of energy, and/or average cost of construction. b. Should the allocation be similar to or different from the allocation of other federal programs (e.g., DOE's Energy Efficiency Conservation Block Grant Program)?
14. For tribal program implementation, do Indian Tribes plan to administer the programs themselves or engage with 3rd-party support? What role could DOE play in supporting program implementation for Indian Tribes?
15. What barriers do Indian Tribes face to developing and implementing these programs (e.g., access to infrastructure, technology, or program implementers)? How can DOE help Indian Tribes overcome these barriers and support program efficiencies?
16. What best practices and lessons learned from other tribal efficiency or incentive programs should DOE consider in drafting program guidance? D. Designing Programs for Maximum Impact?

17. What evaluations of similar programs exist that can provide lessons learned and recommendations for effective program guidance, support, and best practices?
18. How should DOE, states, tribes, and territories measure success? Examples may include high customer satisfaction, measured or estimated benefits (e.g., impacts on energy, bills, emissions, health, or peak demand), quality job creation, valuation of home upgrades or overall efficiency, etc. What specific data is needed to evaluate progress toward these recommended metrics of success?
19. What data should program administrators and DOE collect throughout the program for the purposes of evaluation? What evaluation protocols should program administrators and DOE put into place before program implementation begins? a. How often should program administrators be required to evaluate program performance? How often should DOE evaluate the program? b. What specific data is needed to evaluate program success in reaching disadvantaged communities?
20. How should these programs be designed to spur durable market demand for efficient and electrified homes? How can program designs best assure continued funding and financing for home efficiency and electrification improvements even after these funds have been depleted?
21. Based on past successes, what practices and/or policies should program administrators use to drive higher energy savings per rebate dollar invested (e.g., measure bundling, order of installation, home characteristics, or sizing equipment after insulation/sealing)?
22. Should program administrators establish set-asides or limits concerning the distribution of the rebates (e.g., bundled packages, disadvantaged communities, income or other definitions, incumbent heating fuel in the home, high-impact measures)?
23. What best practices, like bulk purchasing or bulk installation, should program administrators consider to reduce implementation costs for rebate recipients or to maximize the reach of program funding?
24. What practices should states, territories, and Indian Tribes include in program design to maximize uptake such as interim targets, incentives to contractors to install eligible equipment, or partnerships with for-profit, non-profit, or municipal entities)?
25. How can programs ensure effective consumer education and outreach? What types of tools and/or materials should DOE develop to support consumers in understanding how to maximize the benefits of these programs?
26. What program design requirements are necessary to support increased investment in new business models, with the long-term goal of sustained financial and market investment and accelerated market adoption?
27. While the electrification rebates allow for application in both new construction and existing buildings, are certain uses more likely to deliver greater benefits? For example, should electrification rebates focus primarily on existing buildings where such improvements are less likely to happen without additional funds? Are there important other applications (e.g., new construction of affordable housing, other?)

E. Integrating Existing Incentives & Programs

28. How can DOE encourage program administrators to build on and coordinate these funds with existing networks and programs to maximize impact? Other programs may include state energy efficiency Revolving Loan Funds (RLF), utility energy efficiency programs, U.S. Department of Health & Human Services Low Income Home Energy Assistance Program (LIHEAP), Weatherization Assistance Program (WAP), tax incentives, among other funding sources.
- What guidance is needed from DOE to make this successful?
 - How should DOE encourage program implementers to design and implement rebate programs to leverage other resources and/or provide seamless services (e.g., through housing finance agencies (HFAs), state RLFs, WAP, or other complementary programs)?
 - What concerns and risks should DOE be aware of in introducing these programs into existing programs and networks? How can program administrators prevent the layering of federal, state, and local incentives whose combined value is greater than that of the product being purchased?
29. What are potential barriers to effective program energy savings attribution? Are there best practices to address these barriers?
30. What safeguards can DOE and/or program administrators put in place to ensure that low-income households are optimally served through various available programs (e.g., Home Energy Rebates, WAP, or other low-income weatherization programs)?
31. What safeguards can program administrators put in place to ensure local utility rebates and other local funding that existed before the Home Energy Rebates are not decreased in response to the availability of the Home Energy Rebates?

F. Opt-In Tools, Resources, Technical Assistance, and Partnerships

32. DOE may invest in tools and resources that states, territories, and Indian Tribes can elect to use to implement their programs. Program components could include
- systems to track or process rebates, transactions, and improvements;
 - systems to verify income eligibility;
 - software to model and optimize savings;
 - systems and/or forms for data collection;
 - model program templates program administrators can adopt in their application;
 - stakeholder engagement guidance and resources;
 - standardized datasets and APIs, and
 - program marketing, education and branding.
 - Which of these should be prioritized?
 - Are any of these not needed?
 - Are other components needed?
33. What existing systems and tools can DOE, states, territories, Indian Tribes, program administrators, aggregators, and/or financiers leverage to implement the Home Energy Rebate programs?
34. Are there any program components that DOE should provide nationally to avoid duplication of effort and/or encourage consistency?

35. What types of support or technical assistance would be most useful for DOE to provide to states, territories, Indian Tribes, and other program administrators to assist in developing program applications as well as in implementation?
36. What qualities should DOE seek in selecting intermediary organizations (e.g., non-profit and community-based organizations) to provide technical assistance, including marketing, education, and outreach to program implementors and others? Examples of support could include help on designing effective programs, braiding funding resources, and ensuring marginalized groups benefit from the rebate programs.

G. Income Verification

37. What types of documentation should be considered sufficient for rebate applicants to demonstrate that they meet income eligibility requirements (e.g., prior year tax return, verification of other federal benefit program eligibility, or recent paystubs)?
 - a) What are common barriers to effective income verification for LMI households and what industry practices are less effective or should be avoided?
 - b) How long should a household's determination of eligibility last?
 - c) Are there examples of programs that have demonstrated high levels of compliance while allowing self-attestation to establish income eligibility? Some programs determine income eligibility by address, such as if 80 percent of more of the census tract has a certain income. What are the benefits and drawbacks of this approach?
 - d) How can program administrators prevent duplicative document or verification requirements?
38. If DOE established a national income qualification system that program administrators could opt into using, what features would be most useful? What features would be duplicative of existing systems?
39. What are successful approaches for determining income qualification for a household in existing state and tribal programs?
 - e) Are any of these applicable to varied levels of income (e.g., less than 80% area median income (AMI); 80-150% AMI)?
 - f) Is it possible to easily modify existing approaches/tools to verify income at new levels (e.g., 80-150% AMI)?
 - g) What eligibility criteria exist that DOE should consider as categorically eligible?
 - h) Within existing multi-family programs, how is income verification required to be provided or confirmed by the building owner?

H. Estimating and Measuring Energy Savings

40. For the Home Efficiency Rebates, how should DOE support program implementers in selecting, developing, and implementing the modeled and/or measured energy efficiency path? What factors will drive decisions to implement a modeled program, a measured program or both programs?
41. What have evaluations found to be key drivers of success in accurately modeling or predicting energy savings?

42. What recommended methodologies or standards could be used by states/programs to calculate energy savings and associated impacts, such as greenhouse gas emissions reductions? What software is used to implement that methodology? What are the key inputs and features?
43. What software tools provide any of the following capabilities?
- (i) Energy usage calibration consistent with BPI 2400
 - (ii) Open-source advanced measurement and verification
 - (iii) Savings valuation based on time, location, or greenhouse gas emissions
 - (iv) Third-party certified documentation of the work scope and predicted impacts
 - (v) Other capabilities of interest, including but not limited to use of standard data schemas (e.g., HPXML), application programming interfaces (API) integrability, etc.
44. Do you have any recommendations for applying BPI 2400 per the legal requirements of the Home Efficiency Rebates?
45. The Home Efficiency Rebates refer to savings based on “time, location, or greenhouse gas emissions.” Please provide input on best practices for calculating savings based on these factors. How should program administrators value these savings in comparison to homeowner energy usage and bill reductions?

I. Eligible Technologies for Rebates

46. How should DOE facilitate that clear information regarding qualifying technologies and projects is readily available to consumers, contractors, retailers, and other relevant stakeholders?
47. The Home Electrification Rebates specifies that qualified electrification projects must include the purchase and installation of certain equipment or materials. Should other related improvements (e.g., smart thermostats, sensors and controls, LEDs) be allowable as part of a qualified electrification project for the purposes of calculating total project costs which can in turn affect the final rebate amount?
48. Should rebates be allowed in instances where use of the rebate-eligible equipment or measure is already required by local code?

J. Data Access and Sharing

49. What should DOE consider when drafting energy usage data sharing guidelines?
50. What are best practices for minimizing the complications of data collection, allowing data sharing where needed, and ensuring data security? Is there an opportunity to build upon Green Button and Green Button Connect?

K. Compliance and Quality Assurance

51. How can program administrators track participation in rebate programs to protect against:
- i. Double-dipping between various federally funded state and Tribal grant programs for the same upgrade

- ii. Households receiving more funds than are allowable under the law
- iii. Contractors/installers purchasing equipment in a way that violates the prohibition of combining efficiency and electrification rebates
- iv. Claims for work not done
- v. Improper installations
- vi. Ineligible products
- vii. Falsifying income eligibility
- viii. Other risks – please identify other risks

52. What types of quality assurance and/or quality control should DOE and program administrators require? What are recommendations for best practices?

53. What data should DOE and program administrators collect to ensure their ability to conduct effective quality assurance and/or quality control?

L. Job Creation & Quality

54. Which contractor and/or laborer credentials and/or certifications should DOE and/or program administrators require for work funded in part by these rebates?

55. What practices are needed to ensure quality installations? Please provide examples of how existing efficiency or electrification programs track quality installations by contractor.

56. How can DOE assure that these rebates support quality construction jobs and quality nonconstruction jobs? M. Buy America and Supply Chain Considerations

57. Which technologies, products, or materials could face barriers to deployment or accessibility due to cost premiums, supply chain constraints, or other production issues?

58. Are there approaches that program implementers can take to reduce supply chain constraints (e.g., bulk purchases, coordination with DOE manufacturing programs)? N. Open Response

59. Is there anything else DOE should be aware of as it develops program design guidance and support for these rebate programs?

60. What evaluations, research, reports, or other resources can help inform DOE's program guidance?

Request for Information Response Guidelines

Responses to this RFI may be submitted in two ways. DOE prefers responses that are submitted via this online form: <https://forms.office.com/g/iuwKCbKpJK>. The form includes response boxes for all 60 questions included in this RFI. Respondents may answer as many or as few questions as they wish. Using this online form will allow DOE to sort and compare responses by question, which will help agency staff to more easily analyze the responses to inform program guidance.

Responses may also be submitted by email to IRAHomeRebates@hq.doe.gov. Responses must be provided as a Microsoft Word (.docx) attachment to the email, with no more than 10 pages in length, 12-point font, 1-inch margins. It is recommended that attachments with file

sizes exceeding 25MB be compressed (i.e., zipped) to ensure message delivery. If submitting responses via email, please identify the specific question number and topic area to which your response is directed, if applicable. Respondents may answer as many or as few questions as they wish.

The deadline to submit responses to this RFI via the online form or by email is **8:00pm ET on March 3, 2023**.

Respondents are requested to provide their contact information at the start of their response to this RFI, including your name, organization, type of organization (state government, nonprofit/community organization, individual, etc.), phone number, and email address.

DOE will not respond to individual submissions or publish publicly a compendium of responses. A response to this RFI will not be viewed as a binding commitment to develop or pursue the project or ideas discussed.

Freedom of Information Act

Responses received under this RFI are subject to public disclosure under the Freedom of Information Act. Because information received in response to this RFI may be used to structure future programs and funding opportunity announcements and/or otherwise be made available to the public, respondents are strongly advised to NOT include any information in their responses that might be considered business sensitive (e.g., commercial or financial information that is privileged or confidential), trade secrets, proprietary, or otherwise confidential.

If an RFI response includes business sensitive, trade secrets, proprietary, or otherwise confidential information, it is furnished to the Federal Government (Government) in confidence with the understanding that the information shall be withheld from public disclosure to the extent permitted by law, including the Freedom of Information Act. Without assuming any liability for inadvertent disclosure, DOE will seek to limit disclosure of such information to its employees and contractors or as otherwise authorized by law. This restriction does not limit the Government's right to use the information if it is obtained from another source.

If a respondent chooses to submit business sensitive, trade secrets, proprietary, or otherwise confidential information, the respondent must provide two copies of the response. The first copy should be marked, "non-confidential" with the information believed to be confidential deleted. The second copy should be marked "confidential" and must clearly and conspicuously identify the business sensitive, trade secrets, proprietary, or otherwise confidential information. Failure to comply with these marking requirements may result in the disclosure of the unmarked information under the Freedom of Information Act or otherwise. The Government is not liable for the disclosure or use of unmarked information and may use or disclose such information for any purpose.

If your response contains business sensitive, trade secrets, proprietary, or otherwise confidential information, you must include a cover sheet marked as follows identifying the specific pages containing business sensitive, trade secrets, proprietary, or otherwise confidential information:

Notice of Restriction on Disclosure and Use of Data: Pages [List Applicable Pages] of this response may contain business sensitive, trade secrets, proprietary, or otherwise confidential information that is exempt from public disclosure. Such information shall be

used or disclosed only for the purposes described in this RFI DE-FOA-0002981. The Government may use or disclose any information that is not appropriately marked or otherwise restricted, regardless of source.

In addition, (1) the header and footer of every page that contains business sensitive, trade secrets, proprietary, or otherwise confidential information must be marked as follows: "Contains Business Sensitive, Trade Secrets, Proprietary, or Otherwise Confidential Information Exempt from Public Disclosure" and (2) every line and paragraph containing such information must be clearly marked with double brackets or highlighting. DOE will make its own determination about the confidential status of the information and treat it according to its determination.