

March 3, 2023

Henry McKoy, Director  
U.S. Department of Energy  
Office of State & Community Energy Programs  
1000 Independence Ave, SW  
U.S. Department of Energy  
Washington, DC 20585

**Re: Request for Information on Inflation Reduction Act Home Efficiency & Electrification Rebate Programs**

Dear Director McKoy:

We write on behalf of East Bay Community Energy, San Diego Community Power, San José Clean Energy, and Silicon Valley Clean Energy to respond to your Request for Information on the Inflation Reduction Act's Home Energy Rebate Programs, which includes \$8.8 billion in funding through Section 50121: Home Energy Performance-Based, Whole House Rebates, and Section 50122: High-Efficiency Electric Home Rebate Program.

We are California-based Community Choice Aggregators (CCAs). In California, CCAs serve more than 200 communities, more than 11 million customers, and represent 33% of the electric load in the state. CCAs are public agencies formed by one or more local governments to procure electricity and advance clean energy on behalf of our customers. CCAs are governed by Boards of Directors consisting of elected officials or City Councils, depending on the public agency structure of the CCA. We reinvest in our communities through a wide variety of programs, with many focused on decarbonizing buildings and transportation. CCAs are also committed to providing renewable, affordable, and accessible power to our local communities, and accelerating the decarbonization of the grid in California. We are pleased to offer the following comments on the RFI:

*A. Respondent Contact Information:*

1. Any questions on our comments can be directed to Bena Chang from Silicon Valley Clean Energy, a local government Joint Powers Authority, at [benachang@svcleanenergy.org](mailto:benachang@svcleanenergy.org) or (408) 475-9732. Bena will coordinate responses from the signatories of this letter.

*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 communities and low-income households are aware of and have easy access to the Home Energy Rebate programs?*

Some customers including multifamily and affordable housing developments need comprehensive, direct install services. It is crucial for the customer experience to be as streamlined as possible, minimizing points of contact and paperwork requirements. Third parties like CCAs should be allowed to aggregate projects and apply for rebates on behalf of the development. CCAs are often trusted organizations with existing customer relationships that can be used as the point of integration. The Home Energy Rebates programs should lower barriers for third parties like CCAs to participate as aggregators in the program.

Many CCAs already offer energy efficiency and electrification programs which can be expanded with additional federal funding. EBCE offers the Health-e Home Program<sup>1</sup> in partnership with BlocPower and Revalue.io which provides low- to moderate-income homeowners with affordable financing options for energy-efficient whole home upgrades including installation of clean heating, cooling, hot water systems, and electric appliances. The program is income-based, available to EBCE customers who earn up to 120% of area-median income. San José Clean Energy, the CCA operated by the City of San José, offers up to 70% discounts on energy-efficient electric appliances in partnership with a local retailer to single-family households in disadvantaged communities and moderate-income households citywide.

### *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)?*

The DOE should allow states to create income verification processes that align with other existing state programs. Qualifying households should have multiple pathways for demonstrating income eligibility requirements. For example, participation in low-income utility discounts or CalFresh Food assistance should automatically be proof that a customer qualifies for Home Energy Rebates. Low-income households already go through verification processes for these other

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<sup>1</sup> See: <https://ebce.org/health-e-home/>

programs, and it would reduce barriers for the Home Energy Rebate programs to use existing verification structures to the extent possible.

*D) Some programs determine income eligibility by address, such as if 80 percent of the census tract has a certain income. What are the benefits and drawbacks of this approach?*

Low-income households are found in all regions in California, and low-income people can live in dispersed, instead of concentrated, geographic areas. Simply using geographic boundaries for identifying underserved communities can therefore miss large numbers of low-income households. We encourage DOE to consider a broad and flexible definition of underserved communities, including using area-median income, allowing affordable housing developments to qualify as recipients of program funding (regardless of the geographic area), and allowing participation in low-income utility discounts to serve as eligibility (also regardless of geographic area). This will reduce barriers to access funding for underserved communities and low-income households, no matter where they are located.

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

Any rebates through the program should be easily accessible and have the fewest possible barriers for consumers. The rules should be clear, and the equipment types that qualify should be aligned as much as possible with other federal and state programs and tax credits to reduce customer confusion and frustration. Any qualification lists should be easily accessible and user-friendly.

Additionally, the Home Rebate Programs should consider providing technical assistance funding and/or outreach funding to help organizations and agencies like CCAs use meter-based consumption data to target education and marketing to customers with highest savings potential to maximize equity impacts.<sup>2</sup>

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<sup>2</sup> This 2022 paper by American Council for an Energy-Efficient Economy describes how income data can help entities target the best candidates for electrification without jeopardizing vulnerable customers who could end up paying more: [https://aceee2022.conferencespot.org/event-data/pdf/catalyst\\_activity\\_32468/catalyst\\_activity\\_paper\\_20220810190535382\\_6bc589fa\\_e8b8\\_4cb3\\_9ce7\\_36b1c042fab3](https://aceee2022.conferencespot.org/event-data/pdf/catalyst_activity_32468/catalyst_activity_paper_20220810190535382_6bc589fa_e8b8_4cb3_9ce7_36b1c042fab3)

Thank you for considering our comments.

Sincerely,

Nick Chaset  
Chief Executive Officer  
East Bay Community Energy

Karin Burns  
Chief Executive Officer  
San Diego Community Power

Lori Mitchell  
Director  
San José Clean Energy

Monica Padilla  
Chief Operating Officer  
Silicon Valley Clean Energy