



Public Service Commission of Wisconsin

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Public Service Commission of Wisconsin
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March 24, 2023

To the Parties:

Re: Quadrennial Planning Process IV

5-FE-104

Comments Due:

Friday, April 7, 2023 - 1:30 p.m.

This docket uses the Electronic Records Filing system (ERF).

Address Comments To:

5-FE-104

Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

The Commission memorandum concerning Focus on Energy's Role in Delivering Inflation Reduction Act Home Efficiency and Electrification Rebate Programs is being provided to the parties for comment. Comments must be received by 1:30 p.m. on Friday, April 7, 2023. Party comments must be filed using the Commission's ERF system. The ERF system can be accessed through the Public Service Commission's web site at <http://psc.wi.gov>. Members of the public may file comments using the ERF system or may file an original in person or by mail at the Public Service Commission, 4822 Madison Yards Way, P.O. Box 7854, Madison, WI 53707-7854.

Please direct questions about this docket or requests for additional accommodations for persons with a disability to the Commission's docket coordinator, Jolene Sheil at (608) 332-7802 or Jolene.Sheil@wisconsin.gov.

Sincerely,

Joe Fontaine
Division Administrator
Digital Access, Consumer & Environmental Affairs

JF:TK:JP:JS:MH:kle DL:01936311

Attachment: Commission Memo

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

March 24, 2023

FOR COMMISSION AGENDA

TO: The Commission

FROM: Joe Fontaine, Administrator
Tara Kiley, Deputy Administrator
Joe Pater, Director, Office of Energy Innovation
Mitch Horrie, Focus Performance Manager
Jolene Sheil, Focus Portfolio Manager
Division of Digital Access, Consumer & Environmental Affairs

RE: Quadrennial Planning Process IV - Focus on Energy Delivery 5-FE-104
of the Inflation Reduction Act Home Efficiency and
Electrification Rebate Programs

Suggested Minute:

The Commission order that Focus on Energy (shall/shall not) be the implementer for Inflation Reduction Act funds awarded to Wisconsin through the HOMES and HEEHRA programs. The Commission determined that the application to the Department of Energy for HOMES and HEEHRA funds shall be approved by (the full Commission/the delegated Commissioner for Focus on Energy and the State Energy Office).

Introduction

The purpose of this memorandum is to determine whether Focus on Energy (Focus) should be the implementer for two residential rebate programs created by the Inflation Reduction Act of 2022 (IRA) or if the Wisconsin State Energy Office (SEO) should pursue a different method to implement these programs. Whether the Commission determines that Focus should be designated to implement these IRA programs or that the programs should be independently implemented through the SEO, it is anticipated that certain details regarding program implementation will need to be addressed with the Commission at a future date once the U.S. Department of Energy (DOE) publishes program guidance. Additional detail regarding

potential considerations that may require future Commission decisions is presented later in this memorandum.

Background

On August 16, 2022, President Joseph R. Biden signed the IRA into law (Pub. L. 117-169).¹ In total, the law includes \$391 billion to support clean energy and address climate change. Two provisions of the IRA that together authorize more than \$8.5 billion nationwide are relevant to this memorandum:

- Section 50121 authorizes \$4.3 billion in formula grants to State Energy Offices to carry out the Home Energy Performance-Based, Whole-House Rebates (HOMES) program
- Section 50122 authorizes \$4.275 billion in formula grants to State Energy Offices to carry out the High-Efficiency Electric Home Rebate Program (HEEHRA)

Together, these provisions are referred to as the Home Energy Rebate (HER) programs. With both programs, the IRA establishes that the appropriated funds are to remain available through September 30, 2031.

The SEO was informed in January 2023 that it is eligible to receive the following estimated amounts in formula funding to implement the HER programs:²

- Section 50121 HOMES: **\$74,904,830**
- Section 50122 HEEHRA: **\$74,470,200**

The DOE is issuing two separate formula grant application opportunities in 2023. The first grant opportunity, released by the DOE on March 23, is the Administrative and Legal Requirements Document (ALRD) for submitting applications for a portion of the administrative funds for both the HOMES and HEEHRA programs. These funds would allow the state to begin to hire and conduct a minimum set of planning and administration activities to prepare for

¹ INFLATION REDUCTION ACT OF 2022, PL 117-169, August 16, 2022, 136 Stat 1818;
[Inflation Reduction Act \(congress.gov\)](https://www.congress.gov/bills/117/169)

² [State And Tribe Allocations for Home Energy Rebate Program | Department of Energy](#)

submitting the HOMES and HEEHRA Program Plans.³ Wisconsin’s allocation for the HOMES program is \$1,872,621 and for the HEEHRA program the allocation is \$1,861,755. The second grant opportunity, expected in Summer 2023, will detail the full HER program requirements and include the Funding Opportunity Announcement (FOA) which will allow states to apply for the formula rebate allocations.

Table 1 below summarizes key aspects of the HER programs. For each program, up to 20 percent of the total funding received by SEOs can be used for program-related planning, administration, or technical assistance.

Table 1: Summary of IRA HER Program Funding

Program	Funding for WI	When?	Who Is Eligible?	What is Eligible?	Rebate Amounts
HOMES Rebate (Section 50121)	\$74.9 million available through September 30, 2031	After DOE guidance and approval of state plans	Homeowners & multifamily building owners, all income levels (or aggregators ¹) Existing housing stock	Whole-home retrofit projects that reduce energy use at least 15%	See Table 2
High-Efficiency Electric Home Rebate (Section 50122)	\$74.5 million available through September 30, 2031	After DOE guidance and approval of state plans	Single family and multifamily residents and building owners, for households below 150% AMI ² Existing housing stock and new construction	Electrical equipment and insulation; for new construction, to replace non-electric equipment, or as a first-time purchase of appliance	See Table 3

¹Aggregators are defined as: “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.

²AMI stands for Area Median Income

Tables 2 and 3 below specify the maximum rebate amounts for the HOMES and HEEHRA programs, respectively. The IRA prescribes two potential pathways for households

³[Home Energy Rebate Programs Administrative and Legal Requirement Document](#)

receiving HOMES rebates: rebates based on modeled energy savings or rebates based on measured energy savings. Participating households must have an energy assessment performed by a trained professional to qualify for a HOMES rebate under the modeled pathway and the rebate amount received is based on the amount of modeled energy savings. With the measured savings approach, contractors can use open-source advanced measurement and verification software approved by DOE to determine a home’s pre- and post-project energy use and the rebate amount received is prorated based on the measured kilowatt-hour or kilowatt-hour equivalent saved. Under HEEHRA, installed equipment must be ENERGY STAR certified to qualify for a rebate. The maximum rebate amounts allowed under both the HOMES and HEEHRA programs are higher for households verified as income-eligible based on their annual income as a percentage of Area Median Income (AMI).⁴ While all households are eligible for rebates under the HOMES program regardless of income, HEEHRA rebates are only available to households earning less than 150 percent of AMI.

Table 2: Rebate Amounts for HOMES Program

HOMES Rebates			
	Modeled savings >80% AMI	Modeled savings <80% AMI	Measured Savings
Energy Savings Requirement			
Minimum energy savings	20%	same	15%
Energy Metric	Calibrated using BPI 2400 Standard	same	Weather normalized – use open-sourced software
Maximum rebate amount			
Percent of project cost	50%	80%	Same
Minimum savings level	\$2,000/home for 20% savings, up to \$200,000/building	\$4,000/home for 20% savings	Per kWh equivalent savings for each state-based on 20% savings amount for average home
Higher savings	\$4,000/home for 35% savings, up to \$400,000/building	\$8,000/home for 35% savings	No cap
Contractor rebate	Right to claim \$200 for each home energy efficiency retrofit in a disadvantaged community ¹		

¹Disadvantaged community means a community that the Secretary of the Department of Energy determines, based on appropriate data, indices, and screening tools, is economically, socially, or environmentally disadvantaged.

⁴ Staff expects that forthcoming guidance from the DOE will provide states with approved tools, resources, and processes for verifying household income eligibility.

Table 3: High-Efficiency Electric Home Rebate

High-Efficiency Electric Home Rebate		
	Requirement	Rebate Caps
Overall	Household <150% AMI	\$14,000 for entities receiving multiple rebates
<ul style="list-style-type: none"> • Rebates shall not exceed 50% of the qualified electrification project for households with annual income between 80% and 150% of AMI. • Rebates shall not exceed 100% of the qualified electrification project for households with annual income that is less than 80% of AMI 		
Equipment		
Heat pumps for space heating & cooling	ENERGY STAR certified	\$8,000
Heat pump water heaters	ENERGY STAR certified	\$1,750
Stove, cooktop, range, or oven	ENERGY STAR certified	\$840
Heat pump clothes dryer	ENERGY STAR certified	\$840
Components		
Insulation and air sealing	ENERGY STAR certified	\$1,600
Electric panels/load service centers		\$4,000
Electric wiring		\$2,500
Other		
Contractor rebate ¹	Eligible entity as described in subsection (d)(1)(c) of IRA Section 50122	Up to \$500

¹The IRA allows for SEOs or Indian Tribes to provide up to \$500 in addition to the standard rebates received by eligible governmental, commercial, or nonprofit entities performing the installation of applicable qualified electrification projects on behalf of low-or moderate-income households or multifamily building owners for buildings where not less than 50 percent of residents are low or moderate income households.

Several of the measures eligible for rebates under the HOMES and HEEHRA programs are currently offered through Focus. Table 4 shows recent program activity for those measures that currently overlap between Focus offerings and IRA HER programs. (Focus incentives for the measures in Table 4 are specifically available for reducing existing electricity and gas use, and customers may not be eligible for Focus incentives if they do not meet Focus eligibility requirements, such as if those measures would instead reduce the use of other fuels.) Other measures, such as the kitchen appliance, electric panel, and electric wiring incentives available through HEEHRA, are not offered by the Focus program.

Table 4: Focus Program Activity Since 2019 for Eligible IRA HER Program Measures

Measure Type	Total Rebates Processed	Total \$ Rebated	# Unique Trade Allies Completing Projects
Whole-Home Insulation and Air Sealing ¹	7,722	\$7,512,593	100
Air-Source Heat Pump ²	3,854	\$2,526,700	308
Heat Pump Water Heater ³	1,341	N/A ⁴	N/A ⁴

¹Projects completed in existing single family and multifamily residential units.

² Includes ducted and ductless air-source heat pumps in existing single family and multifamily units.

³ Includes heat pump water heaters installed in existing and new construction single family units.

⁴ Nearly all (98%) of the HPWH rebates processed by Focus since 2019 are for single family new construction. Single family new construction incentives are for all the energy saving measures combined and are not itemized by measure. Further, builders do not report on the subcontractor installing equipment to Focus. Therefore, the number of unique Trade Allies installing HPWHs in single family new construction projects cannot be determined from available program data.

Each SEO seeking formula grant funding for the IRA HER programs must submit an application to the DOE that includes a plan describing how it will implement the programs. The applications require plans for, among other requirements, how the SEO will verify participant eligibility, how the SEO will monitor and track program activity, and the SEO's plans for quality control procedures to address the potential for waste, fraud, and abuse of program funding. Attachment A provides a list of the information required in each SEO's plan as described in the IRA.

Potential Reach of IRA Home Energy Rebate Programs

The number of households that will be able to participate in the HER programs will ultimately depend on the portion of the allocated funds needed for program administration, designated rebate amounts, the number of low and moderate income households meeting the eligibility requirements, and uptake of program offerings. In a scenario where funds are spread widely due to low average rebate amounts, the HER programs may be able to serve more than 25,000 households, equivalent to more than one percent of all households in the state of Wisconsin. Total households served may be lower if average rebate amounts are relatively high due to factors such as high available HOMES savings and/or high uptake from low- and

moderate-income households eligible for higher rebate amounts. IRA includes a provision that would allow for any program funds that are not distributed to states within the first two years after passage of the law to be redistributed to SEOs that are operating programs. If Wisconsin begins operating programs and other states decline funds, it is possible that additional program funds could be made available to Wisconsin as soon as late 2024.

Considering Coordination of Focus on Energy with IRA Home Energy Rebate Programs

SEO's throughout the country are currently considering their options for delivering HER programs as they await the DOE's program guidance and FOA. Each state's options and capabilities to successfully deliver these programs are unique. Planning for implementation of IRA HER programs in Wisconsin can take into consideration the existing presence of Focus, which already offers financial incentives to eligible customers across most of the state for energy efficiency projects, including some but not all of the measures to be offered through HOMES and HEEHRA.

Under Wis. Stat. § 196.374, Focus offers incentives to customers of the participating utilities who contribute funds to the program. Currently, all of Wisconsin's investor-owned and municipal electric and gas utilities, as well as 11 of Wisconsin's 24 electric cooperatives participate in Focus. All Wisconsin residents meeting the eligibility requirements of the federal programs, including members of the 13 electric cooperatives currently not contributing to Focus as well as members and customers of contributing cooperatives and utilities, would be eligible to receive rebates through HOMES and HEEHRA.

Under Wis. Stat. § 196.374(3)(a), the Commission is responsible for oversight of Focus programs, including a specific responsibility to maximize the coordination of program delivery between Focus, utility-administered programs, low-income weatherization programs, and "other

energy efficiency and renewable resource programs.” To begin preparing for the implementation of IRA HER programs, the remainder of this memorandum identifies considerations for the Commission associated with the coordination of Focus and the HER programs and assesses the potential benefits and costs of integrating HER program administration with Focus, compared to the alternative option of establishing separate program administration arrangements through the SEO.

Historical Examples and Contractual Process

Focus has previously delivered other federally funded programs on behalf of the SEO. Integrating separate funding sources and customer eligibility requirements has made it necessary for Focus to establish certain administrative processes and data system functionality to enable both the Focus and the SEO to meet their respective program requirements including policies regarding customer eligibility, quality control, and reporting.

During 2009-2010, while the SEO was at the Department of Administration, the SEO and Focus coordinated the marketing, management, and processing of rebates for ENERGY STAR qualified refrigerators funded by the American Reinvestment and Recovery Act (ARRA). Since 2019, Focus has also coordinated with the SEO to use federal funding to offer a Rural and Agricultural Incentive program offering incentives to customers for high-efficiency equipment fueled by propane (e.g., grain dryers), which is not eligible for Focus incentives. The program is delivered by the network of Focus Energy Advisors who are already meeting with agricultural customers to improve their electrical energy efficiency. Costs to administer the Rural and Agricultural Incentive program are tracked by Focus staff. These costs are itemized on invoices from Focus to the SEO and are paid from the available federal budget.

In both examples, the same contracting process was used: the Statewide Energy Efficiency and Renewables Administration (SEERA) signed a Memorandum of Understanding (MOU) with the SEO. The MOU details the funding allocation, reimbursement timeframe, scope of work, and responsibilities of each party. ([PSC REF#: 462128](#)). After the MOU is signed, the contract between SEERA and the Focus Administrator, Aptim, is amended to reflect the additional federal dollars and scope of work.

In the most recent example with the Rural and Agricultural Incentive program, program details and budget were developed in coordination with the Focus Administrator, taking account of the separate funding sources and eligibility considerations described above. The initiative was then included in the annual SEO plan approved by the Commission and the DOE for using State Energy Program Formula Funding.

It is anticipated that the Rural and Agricultural Incentive program model could inform the administrative and delivery process for implementing the HER programs through Focus. This program is an example of using Focus as a platform or a “one-stop shop” concept for agricultural customers. When the Focus Energy Advisor is working with an agricultural customer, they can identify propane efficiency opportunities in addition to any electrical savings opportunities and educate the customer on available rebates and incentives. The customer can choose to proceed with energy savings projects involving one of the fuels or both and the Focus Energy Advisor can assist with either path.

The Rural and Agricultural Incentive program is tracked separately by the Focus Fiscal Agent in its financial data system and by the Program Administrator in the State Program for Energy Customer Tracking, Resource Utilization, and data Management (SPECTRUM) system. Data system functionality allowing for clear and consistent separation of program participants

and costs is necessary to ensure that funding from separate sources is being spent on eligible projects. Expenses tracked include incentives paid to customers, technical and customer support for project development, and administrative costs incurred by Focus to manage the SEO program. Focus does not claim the energy savings from the propane upgrades for the Rural and Agricultural Incentive program since propane customers and providers do not pay into Focus. Members of the 13 electric cooperatives not participating in Focus are eligible for Rural and Agricultural Incentive program incentives.

An additional example where an outside funding is tracked separately from the Focus budget is the We Energies Voluntary Design Assistance Program (VDAP). Under this utility voluntary energy efficiency program, We Energies funds design assistance for new construction and major renovation projects in its territory once all budgeted funds have been obligated for the Focus statewide Design Assistance Program. Projects funded by VDAP are paid from We Energies' conservation escrow account; no statewide program funds are used. Similar to the Rural and Agricultural Incentive program, the Fiscal Agent and the Program Administrator track project expenses separately from the statewide Focus programs and Focus does not claim the energy savings for the projects completed under VDAP.

Alignment with Focus' Quad IV Priorities

The objectives of the HER programs established in the IRA are to reduce household energy bills, increase home comfort, improve indoor air quality, and reduce greenhouse gas emissions. Authorized rebate amounts for these programs are designed to encourage deep energy retrofits (in the case of HOMES) and accelerate electrification (in the case of HEEHRA). As mentioned above, both programs emphasize opportunities for low-to-moderate income

households through tiered rebate amounts based on household income, with the HEEHRA program eligibility limited to households earning less than 150% of AMI.

These federally established objectives are consistent with certain Commission priorities for Focus during the 2023-2026 Quadrennial Period, established in its Final Decision of November 14, 2022 in Quadrennial Planning Process IV (QPP IV). In particular, the Commission established priorities during QPP IV to enhance Focus' engagement with low-income customers in disadvantaged communities, transition the program toward a greater emphasis on reducing carbon emissions, take on a larger role in promoting beneficial electrification statewide, and develop strategies to increase the program's emphasis on long-term market transformation ([PSC REF#: 453081](#)). A successful deployment of the IRA HER programs would be consistent with, and could help accelerate, these Commission priorities.

Potential Impacts of Focus Delivering IRA Home Energy Rebate Programs

Delivery of IRA HER programs in connection with Focus may allow the HER programs to take advantage of existing Focus infrastructure for delivering and tracking projects. For instance, Focus has established relationships with the state's network of Trade Allies that work directly with customers to sell equipment and install energy efficiency projects, including the measures listed in Table 4 above. Contractors in Focus' Trade Ally network are familiar with assisting customers in applying for Focus rebates, and, in many cases, familiar with assisting customers in considering other rebates such as the propane-related incentives offered under the Rural and Agricultural Incentive program. Trade Allies could play a similar role in assisting customers in applying for IRA rebates and clarifying the relationship between Focus and IRA offerings.

The ability to collect, track, and organize HER program activity data will be necessary to analyze program performance, support program transparency, and satisfy federal reporting. As mentioned above regarding the Rural and Agricultural Incentive program, Focus' SPECTRUM data system supports various features developed to meet the evolving needs of Focus, including quality control mechanisms and participant eligibility verification functions. For example, every program participant, including contractors, is recorded in SPECTRUM. This allows for annual and lifetime tracking of payments and supports quality control reviews, such as ensuring participants do not exceed maximum rebate limits. Due in part to Focus' previous experience with implementing the Rural and Agricultural Incentive program and the ARRA refrigerator rebate program (both with SEO funding), and the VDAP program with We Energies funding, SPECTRUM currently has the capacity to process rebates from multiple funding sources.

Alternative Options for HER Program Delivery

The SEO has considerable experience managing programs and project grants supported by funding from the DOE but does not have experience administering a statewide residential rebate program of the scale of the HER programs. Consequently, if it is determined that Focus should not be the vehicle for delivering the HER programs, the SEO anticipates that it would likely contract with a third-party to perform certain program administration functions such as rebate processing, marketing, and data systems development and maintenance.

Contracting with a third party for these functions may delay the deployment of HER programs relative to a scenario where Focus delivers the programs. Time and resources would be required to solicit bids, award contracts, and implement various aspects of program design, delivery, and oversight. Establishing independent program infrastructure may also result in higher program costs, which would increase total HER program administrative budget and

reduce the remaining funding available for rebates. For example, developing a separate HER program data collection and reporting platform may require greater financial investments than integration with Focus' existing SPECTRUM system.

Operating the HER programs separately and in parallel with Focus may also increase the risks of confusion in the marketplace among customers, Trade Allies, and other stakeholders. It may be particularly confusing for customers and contractors seeking rebates for measures and services that are also rebated through Focus. Separate but parallel rebate processes may be detrimental to the overall customer experience and may negatively impact program participation if customers are required to navigate and complete multiple rebate applications to receive all available rebates. This approach may also increase the risk that contractors or customers could receive rebates from both programs that combine to an amount that exceeds the total project cost.

Commission Alternatives

To prepare for future implementation of the IRA HER programs, the Commission may wish to determine in advance whether Focus shall serve as program implementer. This would allow Commission staff to efficiently direct efforts either towards addressing the programmatic details necessary to deliver the HER programs through Focus, or initiate the work necessary to develop program administration arrangements through the SEO.

Determining that Focus would serve as program implementer under Alternative One would set in motion the administrative steps necessary for the SEO and Focus to further investigate, plan for, and implement the processes and procedures necessary to meet the DOE's requirements for the programs. Details regarding that implementation will need to be addressed with the Commission once DOE guidance has been issued, including but not limited to savings to be claimed, attribution, and goals for Focus. As discussed above, there is historical precedent

for Focus delivering federally funded SEO programs, including programs that fund measures outside of the Focus program that can be tracked and accounted for separately from Focus programs. IRA HER programs would also be aligned with certain Focus priorities established by the Commission through QPP IV. Implementation through Focus may allow the programs to be deployed more rapidly and at lower cost by integrating with Focus' existing contractor relationships and data infrastructure; and may minimize the risks of market confusion associated with separately implemented programs.

Selection of Alternative Two would require the SEO to assess its strategy for administering the HER programs without leveraging Focus as the implementation vehicle. This approach is likely to require additional time and administrative resources compared to Alternative One.

Commission Alternatives – IRA HER Implementation

Alternative One: Focus shall be the implementer for IRA funds from the HOMES and HEEHRA programs.

Alternative Two: Focus shall not be the implementer for IRA funds from the HOMES and HEEHRA programs.

Alternative Three: Take no action at this time.

Commission staff also seek direction on whether the Commission finds it reasonable that SEO's application to the DOE for the fully detailed HOMES and HEERHA programs be approved by the delegated Commissioner prior to submission per the updated delegation chart, or whether it should come back to the full Commission for approval prior to submission, regardless of the implementer. While existing delegation authority permits approval of SEO DOE applications by the delegated Commissioner, it does not specifically address decisions associated

with Focus implementation. The Commission may find it reasonable to decide under Alternative One that the fully detailed IRA HOMES and HEERHA program application should be presented to the full Commission, or affirm under Alternative Two that the SEO's application may continue to be approved through delegated authority.

Commission Alternatives – Delegation of IRA Applications

Alternative One: The fully detailed application for IRA funds to DOE shall be reviewed and approved by the Commission.

Alternative Two: The fully detailed application for IRA funds to DOE should be reviewed and approved by the delegated Commissioner.

JF:TK:JP:MH:JS:kle DL: 01927822

Attachment: Attachment A: Information Required in a State Energy Office's Application to the Secretary of the DOE Seeking a Grant Under IRA Sections 50121 and 50122

Attachment A

Information Required in a State Energy Office’s Application to the Secretary of the DOE Seeking a Grant Under IRA Sections 50121 and 50122.

HOMES Program, Section 50121¹
1) A plan to use procedures approved by the Secretary of the DOE for determining reductions in home energy use resulting from the implementation of a home energy retrofit, for purposes of modeled home performance rebates
2) A plan to use open-source advanced measurement and verification software approved by the Sec. of DOE for determining and documenting weather-normalized energy use of a home before and after implementation of a home energy efficiency retrofit, for purposes of measured home performance rebates
3) A plan to value savings based on time, location, or greenhouses gas emissions
4) A plan for quality monitoring to ensure that each home energy efficiency retrofit for which a rebate is provided is documented in a certificate that: <ul style="list-style-type: none"> a. Is provided to the contractor and certified by a third party to the homeowner b. Details the work performed, the equipment and materials installed, and the projected energy savings or energy generation to support accurate valuation of the retrofit
5) A plan for providing a contractor performing a home energy efficiency retrofit or an aggregator who has the right to claim a rebate of \$200 for each home located in a disadvantaged community that receives a rebate under the program
6) A plan to ensure that a homeowner or aggregator does not receive a rebate for the same upgrade through both the HOMES program and any other Federal grant or rebate program.
HEEHRA Program, Section 50122²
1) A plan to verify income eligibility of eligible entities seeking a rebate for a qualified electrification project
2) A plan to allow rebates for qualified electrification projects at the point of sale in a manner that ensures that the income eligibility of an eligible entity seeking a rebate may be verified at the point of sale
3) A plan to ensure that an eligible entity does not receive a rebate for the same qualified electrification project through both a high-efficiency electric home rebate program and any other Federal grant or rebate program
4) Any additional information the Secretary may require

1.) Section 50121(b)

2.) Section 50122 (b)